

Appendix 2 – Responses to Submissions

Submitter	Submission	Response
1	This plan will require manpower to implement - possible community service project?	This will be considered where appropriate. For example Action 2.5.1, 2.5.3 and 4.1.5.
1	Objectives and initiatives need to be carried on regardless of administrators	Once approved by Council, this plan will be adopted and become part of Council's annual plan and be incorporated into unit business plans.
1	More actions will become evident as work proceeds	The plan will be reviewed after 5 years and new actions incorporated accordingly.
1	Funding should be covered in detail - large amount in short term cheaper than long term funding system. Are nurseries able to cope with plant demand?	Many of the actions identified can be completed within existing resources. Where additional resources are required they will be applied for through the annual planning process.
1	Pest control and possibly improvement of soil fertility should have priority	Pest control is recognised as a priority in the plan. Soil fertility would be considered on a site by site basis if thought to be having a negative impact on the indigenous biodiversity of a site.
1	Is there any flora and fauna which once existed in region which needs to be reintroduced?	This is covered by Action 3.1.1: flora and fauna transfer and translocations which could involve the reintroduction of pre-existing species.
1	Discussion groups on the plan in schools and colleges?	There was a 4 week period for general consultation. Prior to this, workshops had been held with environmental groups and the plan was developed with an interagency steering group.
2	Agreed with everything	Thank you for your support.
3	Don't agree with the placement of buildings and structures on the coastal side of the road. The natural coastline should be protected unenhanced for future generations to enjoy.	This issue is covered under the South Coast Management Plan (2002).
3	Perhaps could have a computer prediction if climate change, temp, rainfall will affect plant species - what will be the future plants of Wellington	This option will be considered by Council Officers as part of action 4.3.6
3	When pines were logged and chipped at Tanera Park, the raw chippings were spread over sloping bank and a large amount of natives planted. The raw chippings, in order to decompose, plus their high acidity drew nutrients out of the soil. Within 2 months showed	We recognise the chippings at Tanera Park were an issue. Due to this event, we no longer leave mulch at such depth and the specifications on logging contracts have been changed to reflect this.

	yellowing and nutrient deficiency. Wind then blew over 50% of shrubs unable to establish.	
3	By leaving the marram at Lyall Bay the pingao planting has been wasted, marram has undone all the good work.	Leaving some marram grass behind prevents the sand dune from blowing away. The marram is spot sprayed and pingao planted in the gaps. Pingao grows successfully in this situation. Once the pingao has established, we will spray again with a selective herbicide that kills the marram grass but not the pingao. This gradual replacement is the only way to ensure the retention of the sanddune throughout the process.
4	Methods of weed and pest eradication should avoid leaving toxic residue	Council has a range of policies, guidelines and procedures for chemical use to minimise residue left in the environment.
4	I am impressed by the comprehensive and thorough approach to the BAP. May it be effectively implemented.	Thank you for your support.
5	Maintaining clear waterways and planting beside them should have priority	Your comment has been noted.
5	Needs more on creating connections between managing effluent run-off (WRC) and harnessing, recycling to benefit ecosystems	Action 3.1.2 has been amended to highlight the catchment-wide focus.
5	The 'plant me instead' publication should be distributed to community groups and via supermarkets to show people there are attractive flowering plants. This plan is a model of clarity with a logical sequence, congratulations to the team for producing it.	Thank you for your suggestion. This publication has been distributed to all environmental community groups and to garden centres. We can consider increasing its circulation as part of Action 2.5.1.
6	The objectives around community involvement will be key (2.5 and 3.2). Too often biodiversity can be seen as governments job, but in reality it must have the public support through actions to be successful.	Your comment has been noted.
6	Priority: 3.2, getting the public involved is key. Making them aware of backyard biodiversity. Once they understand the importance of biodiversity the other steps will be easier. The human dimension to biodiversity cannot be understated.	Your comment has been noted.
6	Need funding and resources for timeframes	Many of the actions identified can be completed within existing resources. Where additional resources are required they will be applied for through the annual planning process.
7	Agreed with everything	Thank you for your support.
8	The plan is essential for the future	Thank you for your support.

	biodiversity of many threatened species in the Wellington area	
8	We give our full support to the objectives but we consider stronger emphasis could be given to the threat of global warming	Thank you for your support. Your comment has been noted.
8	We support actions outlined. Again we would give greater attention to the threat of global warming and the need for preservation action. Climate change impact (see report from the secretariat of the convention on biological diversity) action plan needs to cope more dramatically with handling/moderating impact	The Council is currently in the process of developing a Climate Change Action Plan. The Plan will look at reducing greenhouse gas emissions from both Council operations and the community. As part of this work, the Council is also identifying the responses that are necessary to adapt to climate change impacts such as sea level rise and increased frequency of major storm events. This Plan will sit above all seven Council strategies, including the Environmental Strategy. The Biodiversity Action Plan contributes positively to action on climate change through revegetation work, pest management work and preserving existing native forests. But the Climate Change Action Plan will govern how the Council copes with moderating the impact of climate change.
8	We are concerned that weakening of open spaces and rezoning of rural to residential in the District Plan (e.g. district Plan Changes 54&55) and permitting development on shoreline areas will undermine efforts to stave off threats to numerous indigenous species	This is Action Plan addresses this general issue through Objective 2.3: Provide RMA and policy protection (particularly actions 2.3.1, 2.3.4 and 2.3.5).
8	We are concerned at pollution of Wgtn streams (eg Karori - discharge of sewage) and other water areas. Even though sewage is miliscreened and chemically treated it undermines programme	The stormwater consents WCC actively gained in 1993 to address mechanisms to progressively eliminate sewage from stormwater discharges, coastal waters and streams are starting to expire. A key feature of these consents is that work programmes, water quality monitoring and milestones were built into the resource conditions. This provided a strong regulatory driver for investment and improvement. These processes are now considered business as usual- which will not stop when the consents expire. The opportunity presented by the expiry of the current consents will

		<p>allow us to put forward relevant and appropriate consent conditions which recognise thinking has moved on since the consenting processes of 1994 and standards have changed or been introduced which needs to be recognised. The implications of the revised RPS and the draft Stormwater Action Plan (which both influence WCC's District Plan) shall be embraced. We have started a process of assessing the effects and risks associated with microbiological, sediment and the heavy metal content of stormwater discharges and their effects on marine and freshwater receiving environments and ecology.</p> <p>After discussion with GWRC we intend proceeding with a 'global' consent for the city's stormwater discharges. This means we will assign each stormwater catchment to an area type based on the final receiving environment use (recreation/bathing, shellfish gathering, commercial port, stream) and apply for one consent covering each area type. The different area types will have different consent conditions associated with it.</p> <p>The "stream" category will have the aim to protect and enhance urban streams (Porirua, Kaiw, Ngauranga, Owhiro, Karori). Consent conditions will explore measures to reduce sediment inputs and that subdivision practices do not exacerbate the situation and involve water quality standards, as a minimum, will include RMA section 107 requirements and also the draft Regional Policy Statement conditions of maintaining/enhancing the life supporting capacity of the fresh and coastal water.</p>
8	The impact of climate change needs greater priority. The pace of change is now recognised as being quicker and the impact greater (ocean level rise, species destruction etc)	Your comment has been noted.

8	Greater urgency needs to be given to cleaning up our streams from pollution (eg Karori) and shoreline development discontinued	In the draft Regional Policy Statement 5.3 Policy 3 provides for new subdivision, use and development in the coastal environment subject to three conditions. As per the New Zealand Coastal Policy Statement (NZCPS) Policy 3 seeks that natural character of the coastal environment is protected from the adverse effects of inappropriate subdivision, use and development. Council supports these conditions which are consistent with policies of the South Coast Management Plan (2002), Capital Spaces (1998) and provisions for such development in the District Plan.
8	We welcome work being done on the Inner Town Belt to restore indigenous trees etc. It is pleasing to note the comprehensive scope covered by the team that produced the report. Intentions are good but adequate funding and resources are required if the plan is to succeed. We look forward to the Council supporting your efforts.	Thank you for your support. There is ongoing funding for pine tree removal on Town Belt through the Long Term Council Community Plan. Many of the actions identified can be completed with existing resources. Where additional resources are required they will be applied for through the annual planning process.
9	The Sanctuary should be listed as a key player in the Action Plan (along with Otari, WCC, GWRC, DoC etc)	<i>Plan amended as suggested.</i>
9	P3 social benefits – mention the Sanctuary alongside Makara Peak and Otari as tourist attraction	<i>Plan amended as suggested.</i>
9	P5 capital spaces refers to Council support for the creation of KWS, change to “support for the ongoing development and work of the...”	<i>This is a direct quote from Capital Spaces (1998). But as this is outdated the reference has been removed.</i>
9	P5 existing projects – note that the sanctuary is more than a restoration project, it is also a conservation advocate.	<i>Plan amended as suggested.</i>
9	P5 & 7 existing projects and threatened species, sanctuary native fauna is more than birds – also lizards frogs and insects	<i>'Native bird life..' (p5) changed to 'native flora and fauna'. P7 'birds and mammals' changed to 'animals'.</i>
9	P7 weeds – the BAP should recognise and address issues around significant plants that are considered native yet are recognised weed species in Wellington. Karo, Karaka, Pohutukawa. Will affect approach to karaka mentioned on p9.	<i>While the key focus of the plan remains indigenous biodiversity, a new section on introduced species has been included. This sits at the end of the profile on Wellington's biodiversity. In addition, pest management actions have been amended to include native weeds.</i>

9	P14 case study sanctuary – the sanctuary has already developed a diverse range of wetland habitat. Next identified step is removal of exotic fish and restoration of native freshwater fish community	<i>Plan amended as suggested.</i>
9	P18 strengths – sanctuary is not a CCO but an independent charitable trust. Strength is organisations with a strong biodiversity conservation and restoration focus. Action 2.5.4 should be reconsidered in light of the misunderstanding of sanctuary status.	<i>2.5.4 – change wording: Continue relationships between organisations with strong biodiversity conservation focus e.g. Wellington Zoo, Karori Wildlife Sanctuary, Parks & Gardens</i>
9	P18 issues – predator control should be considered a major issue, particularly buffer zone around sanctuary and other high value biodiversity areas (rodents and mustelids)	<i>On-going pest control is identified as an issue.</i>
9	Objectives 2.1 and 3.1 are linked. Focus of 2.1.2 and 3.1.1 is threatened species, should also recognise missing species that were once found here	Provision for the recognition of reintroducing ‘missing species’ is covered under Action 3.1.1 through flora and fauna translocation
9	2.1.2 could include KWS as important existing contributor to species recovery	<i>Amended as suggested.</i>
9	2.1.3 who will define ‘acceptable’ levels of pest control? Control measures should be set in consultation with appropriate management agencies - such as KWS regarding land adjacent to it	<i>Amended to read: Control pest plants and animals in accordance with the Wellington City Council Pest Management Plan.</i>
9	3.1.6 focuses on removal of ‘exotic’ vegetation and re-planting. This should also recognise alien native trees e.g. karaka, karo, pohutukawa	<i>Pest management actions have been amended to include ‘native weeds’.</i>
9	3.2.1 Biodiversity in the Backyard initiative should include pest control, involving landowners in pest control in priority areas has large potential	Yes, this will include involvement in pest control.
9	4.1.1 Sanctuary could help set targets and standards, particularly as they are affected	Thank you, we will be in touch.
9	4.1.2 Include Sanctuary in data sharing network	<i>Amended as suggested.</i>
9	4.1.3 Clarify, for affected parties, what principles and policies it intends to adopt into its infrastructure and land management. Partner with affected partners, such as Sanctuary, to develop principles and priorities.	Affected parties will be consulted as a matter of course during the development of relevant plans and policies.
9	4.3.3 Include Sanctuary in biodiversity network	<i>Amended as suggested.</i>
9	4.3.4 Also use local sources, such as Sanctuary, for developing best practise biodiversity conservation	<i>Amend to: Work with other areas locally, regionally, nationally and worldwide...</i>
10	Very concerned about lack of action to control invasive exotic plant species in Ngaio, particularly acacia in lower Ngaio	Pest plants and animals are controlled in accordance with the priorities set in the Wellington City

	Gorge, sycamore in Piwakawaka Track and many other areas and Darwin's Barberry on Western Hills	Council Pest Management Plan. An action in this plan is to ensure the continued implementation and review of the Pest Management Plan.
11	Agreed with everything – didn't feel qualified to comment on timeframe	Thank you for your support.
12	Totally inadequate regard for the contribution of the Botanic Garden to the biodiversity of the city	<p>Include references to the Garden as follows:</p> <p>Under existing projects pg 5: <i>The Wellington Botanic Garden and Otari-Wilton's Bush have specific plans and projects governing the management of indigenous biodiversity within their area.</i></p> <p>Pg 6: <i>"Some areas have also been preserved by early Wellingtonians. Otari-Wilton's Bush and the Botanic Garden native forest remnant are some of the best examples of these"</i></p>
12	Almost total focus on indigenous plant biodiversity, diminishing the existence and relevance of exotic species – see submission for further info.	<i>While the key focus of the plan remains indigenous biodiversity, a new section on introduced species has been included. This sits at the end of the profile on Wellington's biodiversity. In addition, pest management actions have been amended to include native weeds.</i>
13	2.1.3 The spread of Darwin's Barberry is an issue. It should be eliminated not just controlled to an acceptable level in high value sites. If it is not dealt with it will just keep returning, thanks to birds.	Due to the extensive coverage of Darwin's Barberry, its eradication is not practicably possible. We are controlling it on a site led basis as funding allows.
13	An excellent plan and proud to live in a city prepared to take action on biodiversity issues	Thank you for your support.
14	QE II is keen to work with WCC to protect biodiversity on private land	Thank you for your support.
14	1.1, 1.2 Fully support and offer to share any information from the Trust with the Council	Thank you for your support.
14	2.1 Fully support – locally threatened species should also be targeted	The protection of locally threatened species is included in 2.1.1.
14	2.1.2 Fully support – include QEII as an organisation to be worked with	<i>Amended as suggested.</i>
14	2.1.3 Fully support –QEII covenantors can apply for BCF	Thank you for your support.
14	2.1.4 Fully support – QEII works with people on south coast and can apply for BCF for goat eradication	Thank you for your support.
14	2.1.6 Fully support – include QEII as organisation. Management plans are	<i>Included in 'how it might be done': ...Ensure that all sites of ecological</i>

	provided by QEII for covenants with threatened species	<i>significance have ecological management plans, beginning with priority sites and working with QEII where appropriate.</i>
14	2.3 Fully support – ensure all planning staff and council officers have a basic understanding of QEII and it’s role in mitigation of development	Your suggestion has been noted.
14	2.4 Fully support – QEII welcomes contribution from WCC. Could provide a link on WCC website to Trust website and rep contact details	Your suggestion has been noted and will be carried out when opportunity arises.
14	3.1 Fully support – recognise that it is essential to follow best practice to ensure funding is spent creating conditions for natural processes to proceed – nature will prevail given the opportunity	Thank you for your support.
14	3.2 Fully support – QEII is happy to provide articles or opportunity for articles to promote WCC assistance	Thank you for your support.
14	4.1.2 Fully support - include QEII as organisation to share data with	<i>Amended as suggested.</i>
14	4.1.5 Fully support – in other areas, community groups are sometimes involved in pest and weed control on covenants in their community	Your suggestion has been noted.
14	4.2.1 Fully support – consistent monitoring programs are essential and QEII welcomes opportunity to set up framework	Thank you, we will be in touch.
15	Pg 1 Replace “actions for biodiversity” with “actions to enhance biodiversity” or “actions to protect biodiversity”	Change to: <i>“actions to protect and restore biodiversity”</i>
15	Pg 1 Include species protection and legal protection of areas in first paragraph (see RMA section on page 3). Make exhaustive list or else say “biodiversity activities that the Council executes include...”	Change to: <i>“These biodiversity activities include...”</i>
15	Pg 1 Sort the list at bottom of page differently. Put ‘restoring biodiversity’ at top of list, then ‘protecting biodiversity’, then working closely with other organisations	<i>These outcomes are ordered to match the objectives outlined in the action plan. “Restoring our indigenous biodiversity..” will be moved to the third bullet point.</i>
15	Pg 2 Change or take away “astounding”	<i>Amend as suggested</i>
15	Pg 2 Rephrase connections	Change first paragraph <i>“different kinds of plants and animals around us and all the species that support and link them”</i> . Change note <i>“Biodiversity incorporates all biological life, including fungi and micro organisms, the genes they contain</i>

		<i>and the ecosystems of which they form a part. These life forms contribute to essential ecological processes”</i>
15	Pg 2 Only a lot of different species for species diversity, not necessarily for the others	This is clarified in the second sentence.
15	Pg 2 Replace “these species become extinct” with “more species have become extinct leading to a reduction of...”	As above
15	Pg 2 Comment on second paragraph – is the Council not made out of Wellingtonians?	Amend to: <i>“All Wellingtonians (including Wellington City Council) can have a...”</i>
15	Pg 2 Insert “can” between ‘Wellingtonians’ and ‘have’	Amended above
15	Pg 2 “Biodiversity includes all..... the genes they contain” – who’s they?	This refers to all biological life.
15	Pg 2 Insert “New Zealand is internationally recognised as a”	<i>Amend as suggested</i>
15	Pg 2 Replace “two species of bat” with ‘our species of bat’ – we have four or six species now	<i>Amend as suggested</i>
15	Pg 3 I think the most important point is missed here: Biodiversity= resilience and stability. We need functioning ecosystems to sustain our activities in a functioning environment. Tie the economic part into the environment part. The environment section needs to arch over all the other sections. Without the environment we wouldn’t have the others.	Add to Environmental paragraph: <i>“Resilient and stable ecosystems are essential to sustain all of our activities in a functioning environment”</i>
15	Pg 3 Replace first sentence of last paragraph with “Wellington City Council manages around 3600 hectares of publicly owned open space land”	<i>Amend as suggested</i>
15	Pg 3 The challenge isn’t clear in that paragraph – rephrase that sentence	Amend to: <i>“Wellington City Council must look after the...”</i>
15	Pg 5 Protecting threatened species – remove “and, in particular”	<i>This is a direct quote from Capital Spaces (1998). But as this is out-dated the reference has been removed.</i>
15	Pg 5 Karori Wildlife Sanctuary is already created and the marine reserve established	As above
15	Pg 5 Protecting the coast and streams – remove “seek to”, it’s a bit weak.	This is a direct quote from Capital Spaces (1998)
15	Pg 5 Code of Practice – open space values does not equal biodiversity protection	This is the role and wording of the Code of Practice.
15	Pg 5 Revegetation is the same as community greening is the same as replanting – differentiate between the	<i>Amend as suggested</i>

	<p>projects</p> <p>Explain the community greening programme in the last paragraph</p>	
15	Pg 5 Include marine reserve in projects section	Although the Council supports the Marine Reserve, it does not provide funding or in-kind support to consider it part of the Council project section.
15	Pg 5 Rewrite volunteer section to say natives plants, not natives. In this section, isn't it embarrassing to admit that people have to grow their own plants?	It is not felt that this sentence will create confusion. Volunteer groups that run their own nurseries are very proud of this fact and their accomplishments.
15	Pg 6 Compare current cover to cover pre-settlement	This table will be replaced by a map in the final plan.
15	Pg 6 Issues threatening different habitats are not always different, habitat loss and pest species are common threats	Change to: <i>"Issues threatening them. There are also some common threats such as habitat loss and pest species"</i>
15	Pg 6 Add "and early logging" after development and fire in second paragraph	Change to: <i>"development, fire and early logging"</i>
15	Pg 7 Delete "In turn," from first paragraph	<i>Amend as suggested</i>
15	Pg 7 Instead of tui and kereru, which are already present, change to kaka and kakariki	<i>Amend as suggested</i>
15	Pg 7 Replace "birds and mammals" with "animals"	<i>Amend as suggested</i>
15	Pg 7 Change "these species, and birds" to "these species. Birds..."	<i>Amend as suggested</i>
15	Pg 7 Delete sentence "particularly important in windy Wellington!"	Change to: <i>"particularly important in Wellington's wind swept conditions"</i>
15	Pg 7 Mention that genetic diversity is reduced with decreasing population size as less individuals combine.	<i>Amend as suggested</i>
15	Pg 7 Remove reference to "eating out" plants	Amend to <i>"eating palatable native"</i>
15	Pg 7 Change "called Key Native Ecosystems" to "considered Key Native Ecosystems"	This is the official name used to describe these areas.
15	Pg 7 Reword the sentence "associated with the removal of hazardous conifers"	Change to: <i>"Often these areas arise as a result of the removal of hazardous conifers"</i>
15	Pg 8 Scrub and Shrublands – include that they are an important habitat for lizards, insects and some birds	<i>Amend as suggested</i>
15	Pg 8 Remove reference to "eating out"	Amend to <i>"eating palatable native"</i>

	plants	
15	Pg 9 The fact that less than 1% of coastal forest remains is shocking, you may need a sentence addressing what will be done about this	This is covered in the action plan itself.
15	Pg 9 Change coastal scrub sentence to “Matagouri is now endangered in the Wellington area, however...”	<i>Amend as suggested</i>
15	Pg 9 Threatened <i>animal</i> species? No references to plants. Include lizards, coastal bird species	These species are just given as an example and are not an exhaustive list.
15	Pg 10 “Future quarrying activity...” – taking biodiversity into consideration - what does that mean?	Considered in the context of city-wide biodiversity values.
15	Pg 10 Marlborough minimac geckos may be a subspecies of the common brown gecko	Your observation has been noted.
15	Pg 11 Careful of use of word ‘adapted’ regarding penguins	In this situation we do not feel that this word can be taken out of context.
15	Pg 11 Landscapes have been modified, not habitats, and habitats destroyed as a consequence	Change to: <i>“The landscape has been modified, and their habitat destroyed as a consequence. While many...”</i>
15	Pg 11 Any figures associated with recovering population of seals?	Not at this time.
15	Pg 11 How and since when has land use sympathetic to a coastal environment been a consideration?	The proposed Marine Education Centre is one example of this.
15	Pg 12 Case study – you can’t blame the bulldozer if WCC paid for the service, change the sentence	Taken in the context of the whole case study it becomes apparent that this was a WCC contracted bulldozer – the intention is not to blame the bulldozer.
15	Pg 12 Add “Wellington City District”	This has been written in accordance with accepted terminology
15	Pg 12 Reorder third paragraph to read that the islands “sit prominently in Wellington’s harbour; but are within the Hutt City jurisdiction”	<i>Amend as suggested</i>
15	Pg 13 What is to be done about the loss of wetlands?	This is covered in the action plan itself.
15	Pg 13 Is Makara Estuary protected?	Yes, Makara Estuary is protected
15	Pg 14 Change case study on Karori Wildlife Sanctuary. Wellington City Council is not funding the restoration.	With some minor amendments, the Karori Wildlife Sanctuary Trust are happy with this case study.
15	Pg 15 Can’t see a direct connection between mustelids and streams, explain this further.	Change to: <i>Pest animals (possums, hedgehogs, mustelids, cats and rats) are a problem as they prey on native birds and their eggs. Herbivorous pests (rabbits, hares, possums) also eat wetland plants.</i>
15	Pg 16 Infill housing – add sentence on	Change to:

	how the bush fragments can be used by birds as stepping stones between reserves	<i>“Removing urban bush fragments reduces the areas which birds can use as stepping stones between reserves”</i>
15	Pg 17 Add fish to first sentence	<i>Amend as suggested</i>
15	Pg 17 Is the general condition still healthy despite sewage outflow?	According to the 2004 report mentioned in the plan, the condition is still generally healthy.
15	Pg 17 Is work being done by Porirua, Kapiti, Hutt, GW?	This is the focus of action 2.1.10.
15	Pg 18 The strengths of what? Are they strengths?	This refers to the strength of current Council biodiversity management.
15	Pg 18 Change ‘issues’ to ‘challenges’	<i>Amend as suggested</i>
15	Pg 18 Under ‘challenges’ – future initiatives are required, do they provide opportunities? Some points are more concrete than others	Many of the opportunities lead on from the listed challenges.
15	Pg 18 Has there been no identification of significant sites or coordination of biodiversity activities?	There has, but there is potential to do this far more comprehensively.
15	Pg 19 Change each of the headings for the four themes to make them clearer. E.g. To help identify the state of Wellington’s biodiversity, the Council will:	<i>We feel that this will weaken the statements, however we will try to format them more clearly.</i>
15	Pg 21 1.2.1 Who’s doing the blue and green network plan?	The lead responsibility is the Open Space Planning team from Wellington City Council
15	1.3.1 Surely this is part of the RMA consents?	This action is geared towards environmental education of the wider public, not as part of a consent process. It leads on to action 2.5.7.
15	2.1.2 What exactly is meant by in-situ and ex-situ in this context?	These are defined in the glossary.
15	2.1.3 Could the Animal Health Board and DoC contribute to controlling pest plants and animals?	The implementation of the Pest Management Plan is the responsibility of the Council.
15	2.1.5 Hasn’t this been done yet?	It has for some areas, but there is potential to do this far more comprehensively.
15	2.2.1 How is the protection of the sites going to be prioritised? All of them? The top 10?	Prioritisation will be based on ecological principles and assessment.
15	2.2.2 How? Hard to make that decision.	This is part of an organised rezoning process.
15	2.5.9 This is more conservation/environment protection, not sure about its place here among biodiversity work. Or are you listing environmental initiatives?	Some initiatives that have an indirect on biodiversity values have been included in the action plan.
15	4.3.3 Include MfE among organisations	<i>Amend as suggested</i>
16	Urgent protection of mature forest on private land which is in danger of housing development e.g. land bordering	This general issue is covered by Actions 2.1.1 and 2.3.1 which is intended to offer more protection

	Huntleigh Park. Urgent consideration of purchase of such land for public ownership.	for ecologically significant sites on both public and private land.
16	Encourage attempts by locals to establish 'Friends of Huntleigh Park'.	This is covered under Action 2.5.3. Note that if you wish to set up such a group, please contact Wellington City Council.
16	Council to be proactive in providing wheelchair and pushchair access to Huntleigh Park.	This is an access issue and has been passed on to the relevant Council Officers for consideration.
16	Urgent examination of existing ownership of access ways	This is an access issue and has been passed on to the relevant Council Officers for consideration.
17	Will the Council adhere to the plan?	Once approved by Council, this plan will be adopted and become part of Council's operations, continuing for the life of the plan.
17	Have you addressed subdividers and subdivisions siding with the developers? Actions of developers and "supportive" councillors on subdivisions – nibbling away at the forest edges needs to be urgently addressed	This general issue is covered by Actions 2.1.1 and 2.3.1 which is intended to offer more protection for ecologically significant sites on both public and private land.
17	You say nothing about the commitment of Councillors and staff to adhere to such a fine plan	Once approved by Council, this plan will be adopted and become part of Council's operations, continuing for the life of the plan.
17	Why is this not a major publicity vehicle for Council? It's of major consequence to ratepayers, city and urban dwellers and actual landowners who love Wellington for what it is and have spent 40 years helping to save it for future generations	This publication was notified for public consultation in accordance with standard Council practise. It was advertised in the Dominion Post, local papers, Council publications, through community groups and community centres and in all libraries and service centres around the city. We apologise if this did not meet your expectations. Please also note that better publicity of activities, events and achievements relating to Wellington's biodiversity is action 3.2.3.
18	Pg 7 Main issues – "edges of forests being nibbled away". A proposal is before Council now where this could in all likelihood happen regarding Huntleigh Park	This general issue is covered by Actions 2.1.1 and 2.3.1 which is intended to offer more protection for ecologically significant sites on both public and private land.
18	The question is will the action plan be followed at all levels in Council	Once approved by Council, this plan will be adopted and become part of Council's annual plan and will be incorporated into unit business plans. Also see action 4.1.4 where biodiversity awareness will be promoted across all City Council practices.

18	Protection of Huntleigh Park and surrounding bush regeneration is a priority; it is a significant remnant of coastal forest in lower north island. The whole theme of biodiversity is a priority, the components are inter-related	Your comment has been noted.
18	Encourage and support formation of community based 'Friends of Huntleigh Park' or similar.	This is covered under Action 2.5.3. Note that if you wish to set up such a group, please contact Wellington City Council.
18	This publication and its intent should be major articles in major or suburban newspapers and television. Publicity of it to date has been negligible.	This draft plan has been advertised in suburban newspapers, Council publications, Libraries and Service Centres. Please also note that better publicity of activities, events and achievements relating to Wellington's biodiversity is action 3.2.3.
19	We strongly support direction of the plan	Thank you for your support.
19	Priority should be given to action 4.1.3, as this is an area often overlooked	Your comment has been noted.
19	We feel that the section named "research" does not actually contain details of research as such, through actions proposed are commendable	Please also note that these themes and corresponding objectives were developed by an interagency consultation group. They have primarily been a way of organising our thinking and raising awareness of the general issues. Many of the actions relate to more than one theme.
19	We wish to congratulate Council on producing this document, which will provide a basis for future actions	Thank you for your support.
20	Welcome the inclusion of measures to promote the protection of biodiversity on private land as well as public land	Your comment has been noted.
20	Applaud the emphasis given to supporting and encouraging the community's involvement in conservation and restoration projects	Your comment has been noted.
20	Only negative comment is that the time to respond was inadequate	This publication was notified for public consultation in accordance with standard Council practise. It was advertised in the Dominion Post, local papers, Council publications, through community groups and community centres and in all libraries and service centres around the city. We apologise if this did not meet your expectations.
21	Support general direction and objectives	Thank you for your support.
21	Plan is not specific enough in places. Hopefully as plan is developed threatened areas will be named and given plans for protection.	This is certainly the intent of the plan. Objective 1.1, followed by actions 2.1.1, 2.1.5, 2.2.1 and 3.1.1 are designed to name and give

		specific plans for the management (protection and restoration) of ecologically significant areas.
21	Wellingtonians want city's natural landforms preserved...nowhere in this document is any attempt to legally protect Wellington's South Coast and headland from development.	Biodiversity values will be prioritised for protection in a city-wide context under action 2.1.1. These will include habitats (ie ecosystem diversity). Coastal habitats have been recognised as an ecosystem that will receive added protection and restoration under this plan. The protection of significant landscapes are beyond the scope of this Plan, however protection may be achieved through public ownership, South Coast Management Plan, District Plan zoning, and the Regional Policy Statement. In the draft Regional Policy Statement 5.3 Policy 3 provides for new subdivision, use and development in the coastal environment subject to three conditions. As per the New Zealand Coastal Policy Statement (NZCPS) Policy 3 seeks that natural character of the coastal environment is protected from the adverse effects of inappropriate subdivision, use and development. Council supports these conditions which are consistent with policies of the South Coast Management Plan (2002), Capital Spaces (1998) and provisions for such development in the District Plan.
21	Designation of open space areas.	Action 2.2.2 intends to systematically reclassify ecologically important Wellington City Council owned areas as vested reserves. This will certainly offer more protection to these areas. Priority has been given to south Coast reserves and those in the outer Green Belt. It is planned to have all reserve land classified within the next three years.
21	Carbon sinks and reforestation on land from Owhiro Bay to Makara.	This is the intent of action 2.4.2, to promote carbon credits to landowners to encourage them to protect and manage biodiversity on their own land. Council is also looking at the land it manages around the city with a view to carbon credits.

21	Seamless coastal fringe	Amend objective 1.2.1: <i>Identify ecological linkages and habitat requirements (including riparian/stream and coastal connections) for a 'green and blue' network plan</i>
21	Working with other Councils	We will work with our neighbouring councils to implement action 2.1.10 and create large scale linkages and corridors. Thank you for your support.
21	No mention of groups under Theme 2 – Protect.	Local community groups are covered under the Theme 'Protect' under objective 2.5. Actions 2.5.1, 2.5.2, 2.5.3 and 2.5.11 directly relate to the need to support these groups. Action 4.1.5 which relates to involving the community in monitoring has been extended to include 'research'. Amend: <i>4.1.5 Explore opportunities for community involvement in research, including monitoring</i> Action 2.1.5 has also been amended to: <i>Create ecological management plans for all areas of ecologically important public land, as identified in objective 1; linking with local community groups and iwi where applicable.</i> And under action 2.5.1 amend the 'how it might be done' section to include "encourage community initiatives"
21	Too little time to assimilate and read this document.	This publication was notified for public consultation in accordance with standard Council practise. It was advertised in the Dominion Post, local papers, Council publications, through community groups and community centres and in all libraries and service centres around the city. We apologise if this did not meet your expectations.
22	Support general direction and objectives	Thank you for your support.
22	Cannot see a real action plan	Every effort has been made to make this a workable Action Plan.
22	No examples of action in the Northern Ward	Most of the actions are city wide.
22	2.5.4 needs to be a focus where these	2.5.4 is one action in a suite of

	projects do not 'steal' the focus but relate city wide.	actions designed to protect biodiversity city-wide.
22	Too many references to high profile projects and too little on the biodiversity scene that is part of every community.	The plan endeavours to cover a range of biodiversity projects.
22	Needs to be more thinking about use of gullies as pathways linking areas.	Gullies as pathways will be considered as part of Action 1.2.1.
22	Unclear whether indigenous biodiversity, kaitiakitanga and natural environment refer to the same issues.	Indigenous species, biodiversity and kaitiakitanga have been defined in the glossary. <i>Terminology in the text has been reviewed to ensure it is consistent.</i>
22	Grazing lands in the city are significant in our heritage and maintenance of these areas should form part of biodiversity policy.	<i>While the key focus of the plan remains indigenous biodiversity, a new section on introduced species has been included. This sits at the end of the profile on Wellington's biodiversity.</i>
22	Magpies and dogs are major limiting factors in the maintenance and restoration of our natural environment.	Your comments have been noted and will be dealt with on a site specific basis.
23	Support general direction, objectives and actions	Thank you for your support.
23	Include an action with funding attached from the training budget for educating Council Officers and Councillors about biodiversity and how it relates to them in their day to day decision making/governance. Prioritise education for the Planners, road engineers and resource consents unit staff.	This is covered by Action 4.1.4.
23	Link this plan to the consents unit work.	This is covered by Action 2.3.5
24	Support general direction.	Thank you for your support.
24	Council needs to demonstrate that it will commit the resources necessary to realise the vision of this action plan.	Many of the actions identified can be completed within existing resources. Where additional resources are required they will be applied for through the annual planning process.
24	All actions under Objective 1.1 and Objective 1.2 should have priority.	Your comment has been noted.
24	Plan needs to maintain and restore a full range of remaining natural habitats and ecosystem to a healthy functioning state and maintain and restore viable populations of all indigenous species and subspecies across their natural range.	<i>This is the intention of the plan. (see Objectives 2.1, 2.2, 3.1). However to clarify this, Action 3.1.1 has been amended to: 'Restore species diversity and representativeness.'</i> In addition, the term 'high biodiversity value' has been changed to better reflect the intention of the plan. We now refer to the 'ecological significance' of an area. This is defined in the glossary as an area comprising any one or more of the following ecological features: representativeness of Wellington's

		indigenous biodiversity, high diversity of ecological and physical features, degree of natural character, relative size and shape, relative rarity and special features, buffering and connectivity, viability. These ecological features contribute to Wellington's indigenous biodiversity and include consideration of current and potential biodiversity values.
24	Too little in plan to give Otari Wilton's Bush Trust confidence that the issues around the remaining natural habitat and ecosystem of Otari will be protected.	The protection of the Otari-Wilton's Bush natural habitat and ecosystem is covered under the Otari-Wilton's Bush Management Plan (2007). In addition, the habitat will be prioritised in a city-wide context under Objective 2.1.
24	OWB Trust would like to see an ecological management plan for Otari in the 2 nd year of the action plan, not waiting until the 3 rd or 4 th years.	The habitat will be prioritised in a city-wide context under action 2.1.5. This will begin in Year 2.
24	We would like surrounding land already signalled to join OWB vested as reserve in the 1 st or 2 nd year.	Council is currently going through an exercise to vest all fee simple lands as reserve in the Outer Green Belt. This includes land around Otari Wilton's Bush. This work will be completed in the next 12 months.
24	More priority given to sites already known as needing protection to the eradication of weeds and minimisation of impacts such as earthworks and rubbish dumping.	Prioritisation of city-wide biodiversity values will be carried out. Action 2.5.7 includes education programmes around rubbish dumping and weeds and begins in year 1. The Earthworks Rules under the District Plan are currently being reviewed. Weed control is prioritised in accordance with the Pest Management Plan.
24	Priority to ensuring other parts of Council's work and planning consents are compatible with action plan and not vice versa.	Your comment has been noted. This issue is covered by Actions 2.3.5 and 4.1.4.
24	Should be an action plan with adequate funding.	Many of the actions identified can be completed within existing resources. Where additional resources are required they will be applied for through the annual planning process.
24	Would like more thought given to having an aim for the ability of Otari to be able to have appropriately sized facilities for education.	The Education Framework review currently under way will give guidance to this issue.
25	Welcome Council initiative and support plan	Thank you for your support.
25	Term 'conserve' is unclear, suggest it is replaced with 'protect and restore'	<i>Amended as suggested.</i>

25	Different uses of biodiversity (indigenous biodiversity, Wellington's biodiversity, our biodiversity) need rationalising and/or defining	<i>Terminology in the text has been reviewed to ensure it is consistent.</i>
25	Plan outcomes bullet point 5 reworded to: "Where possible, restoring our indigenous biodiversity and ensuring that it's easily accessible for all Wellingtonians"	<i>Amended as suggested.</i>
25	Plan outcomes bullet point 6 reworded to: "Generating quality information through monitoring and research to enable us to protect, restore and manage out biodiversity into the future."	<i>Amended as suggested.</i>
25	Protection and restoration of biodiversity must be a compulsory factor in a large number of Council activities and planning. It is unclear whether the Plan will be strong enough on this.	The need for this has been specifically recognised under Objective 2.3, action 3.1.2, and action 4.1.4. It is also an intended outcome of the document itself.
25	Expectation that the Plan would define a set of new and additional actions with extra funding. Seems that the actions are ones that are or should be happening...	One of the purposes of this plan has been to coordinate Wellington City Council's current biodiversity activities, as well as identifying and prioritising additional actions. Where funding is required for these additional actions and it is not currently resourced then additional funding will be applied for through the annual planning process.
25	All major actions probably not covered (eg pet free subdivisions)	Thank you for your suggestion. We have amended Action 2.3.5 'how it might be done' to include "ensuring new developments are sensitive to existing biodiversity values eg cat free subdivisions."
25	Many actions require more than five years to have a significant effect, yet the timeframe finishes at year five.	The plan will undergo a review after five year and new actions developed accordingly.
25	If the plan is not a commitment to funds, to specify that the required items to get funding for every year.	Many of the actions identified can be completed within existing resources. Where additional resources are required they will be applied for through the annual planning process.
25	2.1.9 should include threat of resource (staff, funds, area) when the resource could be used to protect or restore indigenous biodiversity.	The priority at this stage is to ensure biodiversity is not threatened by exotic plantings.
25	2.5.4 Plan should clarify if the botanic gardens are considered to be protecting any biodiversity that is not indigenous to Wellington (like the zoo – global biodiversity?)	Parks and Gardens encompasses the Botanical Gardens, as well as Otari Wilton's Bush etc. In addition, a section on introduced species has now been included.
26	4.1.1, 4.1.3, 4.1.4, 4.1.6 all more appropriate for Protect theme than Research	Please also note that these themes and corresponding objectives were developed by an interagency

	4.2.1 and 4.2.3 more appropriate for Identify theme rather than Research	consultation group. They have primarily been a way of organising our thinking. Many of the actions relate to more than one theme.
26	Pest management and educating private landowners/developers should have priority.	Your comment has been noted.
26	2.1.6, 2.4.1a and 3.2.1 should occur earlier than year 3.	Your comment has been noted.
26	2.3.2 is urgently required and should not be extended to cover the whole 5-year period.	This will begin in year 1, and reviewed in an ongoing basis throughout the five years.
26	Relationship to other Council Policies and Mechanisms – we would like to see Biodiversity Action Plan sitting directly with the Environmental Strategy. We are concerned that Plan appears generally idealistic, with objectives that may not be achieved in practice.	The flow chart is from the existing Environment Strategy. Action 4.1.4 addresses the importance of biodiversity awareness in all City Council practices.
26	Surprised that Wet and Wild finished in 2006. Supposed to be a living document and we would like to see it alongside and supporting the Biodiversity Plan, rather than being superseded by it.	We have ensured that all aspects of Wet and Wild have been covered by the Plan. The Plan addresses all that is covered in Wet and Wild as well as the City's wider biodiversity issues.
26	Otari Wilton's Bush and Botanic Gardens deserve a mention under existing projects (p5) and 'strengths' (p18).	These areas are mentioned on page 18. <i>P5 amended as suggested.</i>
26	P7-8 Another major source of weeds is from the railway corridors	<i>Amended p7 Weeds to: "...many of which begin their life as attractive garden plants and then jump the fence, travelling by bird dispersal or through corridors such as reserves, railways and streams."</i>
26	P7-10,12 Access is an issue for pest management in Wellington's steep terrain.	<i>Amended p10 Pests to: "...ecological significance. The steep nature of many of these sites is an ongoing challenge."</i>
26	The small Kaiwharawhara estuary could be mentioned p13 para 3.	<i>Amended as suggested.</i>
26	P15, para 4. Stream-bank erosion is a major issue in connection with stormwater runoff. Fish passage should be mentioned.	<i>Amended as suggested.</i>
26	P15, para5. Consider rewording. Little work done on the catchment as opposed to the streams.	We feel that Project Kaiwharawhara has been correctly represented as a stream restoration programme sitting within a community catchment plan.
26	P16 This should be expanded to include other housing developments with associated excavations and filling in of gullies.	Greenfield development is not a key issue for the urban area and is covered under lowland forest.

26	P16 Exotic trees with berries should be mentioned as weed issue	See amendment to p7 Weeds.
26	P18 Issues: add 'Lack of biodiversity permissive in Council plans, policies and practices.'	This issue has been specifically covered by actions 4.1.3 and 4.1.4 - Promoting enhanced biodiversity awareness in all City Council practices, and incorporating biodiversity principles into Council plans and policies.
26	Loss of species – 2.1.2 column 2: Add QE2 Trust	<i>Amended as suggested.</i>
26	2.1.6 involve QEII, Universities, DOC and Wgtn Botanical Society.	<i>Amended to include QEII and 'other organisations'</i>
26	2.1.8: District Plan and other Council Plans and Policies should be in this column.	This action is specifically about educating people as they are working through the resource consent process. Other plans and policies are covered under 2.3.2 and 4.1.3.
26	2.3.2 Add Ceasing filling in of gullies and ephemeral streams with surplus fill from excavations	This is covered by the statement 'retaining streams in their natural state'.
26	2.3.5 replace 'or request' with 'with'.	<i>Amended as suggested.</i>
26	QEII Trust covenanting	<i>This has been addressed under 2.4.1a – but to clarify we have added 'shared between WCC...' The QEII Trust are supportive of this initiative.</i>
26	Rates relief	This will be addressed as part of the WCC Covenant Policy (Action 2.4.1b).
26	New voluntary groups	Thank you for your suggestion. We have forwarded it to the relevant Council Officer.
26	Problem behaviours	Bylaw enforcement should happen as a matter of course. The focus of action 2.5.7 is education. 'Stormwater Sump patterns' relates to the pictures on stormwater covers eg fish to raise awareness of where stormwater goes.
26	Continuing work on streams	<i>Amended to include "minimising stream bank erosion".</i>
26	Ecological corridors	<i>Trans-metro has been replaced with 'On-Track'</i>
26	Land cleared of exotic vegetation	This action is particularly targeted to projects on City Council land as an initial priority.
26	Participation in green and blue network	<i>Our Wellington page has been added as another example.</i>
26	Sharing Biodiversity data: include QEII Trust and NIWA	Amended as suggested
26	Council Plans, policies and practices 4.1.3 4.1.4	With the incorporation of biodiversity principles into policies (eg Subdivision Design Guide) they

		will become Council policy.
26	Progress/Feedback	The intention of this Plan is to include the public in the protection and restoration of Wellington's biodiversity.
26	Stormwater runoff	Action 4.2.2 will look at erosion and stormwater runoff. This will be carried out using the most effective research methodology.
26	Storm damage	Storm damage would be considered as part of the impact of climate change
26	Threats	Biosecurity incursions are covered under 2.1.11. Sea level rise is covered under Climate Change (4.3.6). Responses to major fault line movements/tsunami/earthquake are managed by Wellington Emergency Management Office (WEMO)
26	Research outcomes	Please also note that these themes and corresponding objectives were developed by an interagency consultation group. They have primarily been a way of organising our thinking. Many of the actions relate to more than one theme.
26	Glossary – green and blue network/biodiversity value	<i>Amended as suggested.</i>
26	Staff Time	The Action Plan has been as realistically constructed as possible.
27	Support general direction, vision, objectives and proposed actions.	Thank you for your support
27	Concern that the focus on high value biodiversity sites is too narrow and that the restoration and protection of entire ecosystems is also important	Action 1.2.1 requires the identification of ecological linkages and habitat requirements and is intended to focus restoration at an ecosystem level.
27	Concern over a lack of targets and outcomes	Action 4.1.1 establishes clear standards and targets for city-wide biodiversity to be implemented alongside the report on the state of Wellington's biodiversity (Action 1.1.1). In addition, the timeframe itself provides measurable targets and this has now been outlined in the plan. Specific targets have also been included. The inclusion of a 'lead responsibility' creates accountability.
27	Greatest threat to biodiversity is lack of knowledge and information so priority must be given to research and investigation. Next threat is isolation of	Your comments have been noted.

	species into small unsustainable islands of habitat, creation of viable corridors should be a priority (ability for species transition).	
27	Effort should be made to make every green or open space a potential habitat zone or corridor no matter how small.	Effort will be made to utilise all green open space. Priorities for management will be assigned under action 2.1.1. Size will only be one of the criterions.
27	Effectiveness limited if plan not fully funded and if it does not become a central core of WCC policy...thrust of strategy needs to be embraced by and included into the regulatory framework to be sure its objectives are achieved and outcomes monitored.	Many of the actions identified can be completed within existing resources. Where additional resources are required they will be applied for through the annual planning process.
28	Short time frame for submissions is less than ideal.	This publication was notified for public consultation in accordance with standard Council practise. It was advertised in the Dominion Post, local papers, Council publications, through community groups and community centres and in all libraries and service centres around the city. We apologise if this did not meet your expectations.
28	Following to acknowledge in plan: Wellington's contribution to global biodiversity, weeds are a major threat to biodiversity in Wellington, many neglected 'wild' areas (including Town Belt) are main source of weed spread;	Amend Global Biodiversity section (pg 2) to include: <i>Retaining a high level of indigenous biodiversity in Wellington results in a high level of global biodiversity.</i> <i>Amended p7 Weeds to:</i> <i>"...many of which begin their life as attractive garden plants and then jump the fence, travelling by bird dispersal or through corridors such as reserves, railways and streams."</i>
28	Neither native plantings nor native vegetation are immune to weed invasion;	The Biodiversity Action Plan does not go into the level of detail you are suggesting regarding individual threats. The threat of weeds is covered in greater details in the Pest Management Plan 2005.
28	focusing weed control efforts on high value areas is inadequate in long term as it would allow them to spread throughout many other areas;	This is why the Council runs both weed-led and site-led programmes as outlined in the main issues section for lowland forest.
28	weeds need to be controlled throughout all land types and tenure;	This is recognised and covered by the action plan. This plan looks at every type of ecosystem found in Wellington and covers both private and public land.

28	more resources directed towards getting members of the public to control weeds;	This is part of action 2.5.8, increasing the community capacity for biodiversity conservation through avenues such as 'Growsafe' training.
28	possible to prevent some weeds from becoming too widespread;	This is why the Council runs both site-led and weed-led programmes, as outlined in the main issues section for lowland forest.
28	logging operations in Town Belt are exacerbating weed growth and spread;	Action 4.1.4 is designed to educate Council staff and contractors on the importance of biodiversity values. The aim is for measures to protect our indigenous biodiversity to be incorporated into Council operations.
28	gorse and broom should not be treated as weeds in areas to be restored to native forest;	Gorse is only sprayed where boundary control has been requested, which is a legal obligation. Broom is not recognised as a high priority for weed control.
28	recovery of native birds and wildlife corridors will enhance extent to which fleshy-fruited weeds are dispersed by birds;	The Pest Management Implementation Plan and proposed funding recognises that as our restoration efforts increase, the efforts put into pest weed control must also increase.
28	Carey's Gully contains significant area of regenerating native forest...efforts need to be made to prevent more of forest being buried under our rubbish...	All sites of ecological significance will be considered and prioritised for protection in a city-wide context (2.1.1).
28	Spraying of weeds and trackside vegetation should be carried out with public warnings...	Council safety measures require adequate signage to be put in place when Council workers are spraying, and until the site is safe afterwards. This is in accordance with the Parks and Gardens Agrichemical Safety Policy. If you do not believe this procedure is being adequately followed, please contact the Parks and Gardens Health and Safety Officer.
28	Suggested additions: 1.1 Action: 1.1.2a <i>How: Support surveying and reporting in line with the Protected Natural Areas Programme administered by DoC, in association with DoC (involving the identification of Recommended Areas for Protection).</i>	Amend to: <i>"In association with the DOC Protected Natural Areas design guide"</i>
28	<i>Action: Compile a comprehensive list of the native plants of Wellington City How: Consult DoC, Landcare Research, Karori Wildlife Sanctuary, Wellington Botanical Society and others and collate</i>	This will be covered as an appendix to action 1.1.1, with threatened species having further investigation as part of action 1.1.2b.

	<i>lists of naturally occurring plants recorded at sites throughout Wellington City (separate lists for each Ecological District described in the PNA Programme).</i>	
28	<i>Action: Compile comprehensive lists of other groups of organisms native to Wellington City How: Consult DoC, Landcare Research, VUW</i>	As above
28	Obj 1.2: <i>Action: Identify what areas need to be involved in a 'wildlife corridor system' throughout Wellington City, including biodiversity reservoirs ('hubs') and corridors ('spokes'). How: Refer to Jim Lynch's plan written in the 1990s. Analyse aerial photos and land tenure. Purchase land where required. Encourage and support native plantings (and weed control) in urban areas where links are required.</i>	The 'green and blue network' plan is a network plan with both reservoirs and corridors. Action 1.2.1 relates to the investigation of the network, action 3.1.3 relates to it's implementation. Amend how it might be done 1.2.1: <i>"Ecological survey and desk top analysis."</i> Amend how it might be done 3.1.3: <i>"Restoration programme; revegetation; work with private landowners; encourage and support native plantings (and weed control) in urban areas where links are required."</i>
28	Obj 2.1: 2.1.2 Work with other organisations to ensure that no nationally or regionally threatened species are lost to Wellington ... and that their genetic diversity is retained as far as possible	<i>Amend as suggested</i>
28	Action: 2.1.1 Prioritise the protection of the following (on public and private land): <i>a) Recommended Areas for Protection (under the PNA Programme), b) Representative coastal plant communities threatened by weed invasion or development, c) Indigenous vegetation that currently or potentially provides important links with other vegetation in the city. How: b) Select large, relatively intact areas of coastal vegetation on the South Coast, eradicate weeds and maintain their absence. Comments: b) Coastal plant communities such as those dominated by wharariki/coastal flax on the South Coast are rapidly being overwhelmed by weeds (especially karo) which thrive in a</i>	These issues are covered under this or other actions. Protection of representative communities are included, as are areas that provide important linkages ('green and blue network').

	<i>coastal environment. Maintaining selected sites in a weed-free state will protect biodiversity and provide a clear illustration of what is being lost. Photographs of coastal vegetation before, during and after weed invasion would also be a useful educational tool.</i>	
28	2.1.4 Eradicate feral goats from the <i>entire peninsula and maintain it as a goat free area.</i> <i>How: Consider the need to prohibit all goats (feral and domesticated) on the peninsula.</i>	The eradication of feral goats means that there will be no more feral goats on an ongoing basis.
28	2.1.9 Prepare a Council standard to ensure that future Council planting of <i>introduced plants (including NZ natives from other parts of NZ)</i> will not threaten biodiversity values. <i>Consult Landcare Research (Peter Heenan) regarding each species.</i>	To cover both exotic and native threats, this action has been amended to: <i>“Prepare a Council standard to ensure that future Council planting will not threaten indigenous biodiversity values”</i>
28	2.1.10 Work with DoC, PCC, LHCC and WRC to protect large scale linkages/corridors on a regional scale.	<i>Amend as suggested</i>
28	<i>Pursue the ecological restoration of Tapu Te Ranga Island as a high priority.</i>	This is covered under 2.1.1 where offshore islands will be recognised as an under represented ecosystem.
28	<i>Set a good example while educating and inspiring the public by controlling all weeds in high profile WCC areas e.g. playgrounds</i>	The Pest Management Implementation Plan recognises amenity weeds as having value for control. This plan supports the implementation which will result in further control in high profile areas.
28	<i>Support the “Southern Wellington Green Space Partnership” which seeks to link existing restoration projects together, extend restoration activities to adjacent WCC land, and to compliment the nature of this area by removing weeds and planting natives in surrounding private and WCC land, including Berhampore Golf Course.</i>	We cannot support a partnership until it has been officially recognised by Council. However the support of community initiatives is covered by action 2.5.1. <i>Action 2.5.1 amend the ‘how it might be done’ section to include “encourage community initiatives”</i>
28	<i>Reconsider the approach to widespread weeds.</i> <i>Identify outlying occurrences of weeds and control them before they become more widespread.</i>	This approach is already being taken for weeds such as Darwin’s barberry where all outliers are controlled. Again, this action is covered by the Pest Management Plan. If you know specific instances of outliers which can be easily controlled then please contact the Parks and Gardens Pest Officer
28	<i>Urgently control weeds such as buddleia which are spreading along the track bulldozed in Carey’s Gully a few years ago.</i>	This action is more specific than is the intention of the plan. However this might be covered as a result of

		action 2.1.3.
28	<i>Eradicate introduced fish from streams in Wellington City.</i>	The Department of Conservation controls recognised pest fish such as koi carp. Other introduced fish, such as trout have been shown to reinfest streams through the sea. Currently there are higher priorities for streams during the 5-year timeframe of this action plan.
28	<i>Identify which native animals may be reintroduced to sites from which they have disappeared, but may now be suitable for them.</i>	This is covered under action 3.1.1 – “flora and fauna translocations”
28	<i>Avoid WCC actions which result in the unnecessary destruction and disturbance of native vegetation such as that in Carey’s Gully. How: a) Increase the urgency with which a zero-waste policy is being pursued for Wellington City. b) Introduce incentives for waste reduction and disincentive for waste production. c) Help producers, retailers and consumers learn about waste-minimising practices and products. d) Adopt strict procedures for determining where tracks may be bulldozed on WCC land with a view to avoiding unnecessary destruction of native vegetation</i>	This will be covered as a result of action 4.1.4 through the education of Council staff and contractors. Although waste issues have an effect on biodiversity, they will be covered under other Council plans and policies. These will take biodiversity into account in accordance with action 4.1.3.
28	<i>2.2.2 Protect all WCC owned areas with high biodiversity values... Conduct thorough weed surveys and prepare weed management plans for each area which address weed sources on nearby land.</i>	Action 2.2.2 is referring to the rezoning of parcels of land to give them further protection. Weed management will be part of the ecological management plans developed under actions 2.1.5 and 2.1.6.
28	<i>2.4 Action: Require developers to control weeds on their land as part of resource consent conditions. How: Insert clauses in District Plan</i>	This will be considered as part of action 2.3.5.
28	<i>Require developers to avoid increasing sediment loading in waterways. How: Insert clauses in District Plan</i>	This will be covered under objective 2.3.3 and the new earthworks rules currently being written.
28	<i>Educate the public about the importance of eco-sourcing and the use of the Ecological Districts (of the PNA Programme) as a guide towards this.</i>	The promotion of eco-sourcing to the wider community is covered in action 3.1.4.
28	<i>Promote the use of local native shrubs and herbs in gardens.</i>	This is covered under action 3.2.4 and will also be promoted through action 3.2.1.
28	<i>2.5.9 How: Ensure WCC trucks that collect</i>	The pricing of disposal for green waste is currently being

	<i>green waste do not mix it with inorganic material and dump it all in the landfill (as has happened in the past). Provide free green waste dumping at refuse station for the public (fines for inorganic content).</i>	investigated.
28	<i>Increase public awareness about the threat posed by weed.</i>	Educational campaigns on environmental weeds is part of action 2.5.7
28	<i>Increase public awareness of the threat posed by bird dispersal of weeds</i>	As above
28	<i>Encourage private landowners/residents to control weeds on their land</i>	As above
28	<i>Encourage the public to “adopt” parts of WCC land, e.g. Town Belt, to control weeds and establish natives</i>	This will come from action 2.5.3, identifying areas where groups are needed and facilitating the creation of these groups.
28	<i>Encourage the public to report weed sightings.</i>	This will be considered as part of action 4.1.5.
28	<i>Encourage the public to form Weedbusters groups to tackle specific weeds in specific areas.</i>	Amend 2.5.1 how it might be done: “Work in collaboration with other organisations eg <i>Greater Wellington Regional Council Take Care programme, DOC Weedbusters programme</i> ”
28	<i>Encourage the public to plant locally-sourced natives.</i>	Action 3.1.4 and 3.2.4. are designed to achieve this objective.
28	<i>Provide a wide range of information and advice on WCC’s website regarding weeds and native plants.</i>	Action 3.2.3 and 4.1.6 are designed to achieve this objective.
28	<i>Establish a shrubarium to showcase locally-sourced native shrubs, e.g. at Preston’s Gully.</i>	This is covered under action 3.2.4. Otari-Wilton’s Bush and other Council displays (such as traffic islands) contain a wide range of locally-sourced shrubs and herbs.
28	Educate the public about the significance of “native weeds” including karo, houpara, pohutukawa and northern lacebark.	Action 2.1.9 has been amended to remove the reference to exotic vegetation, so it now covers all vegetation that threatens our indigenous biodiversity. The ‘how it might be done’ section of action 2.5.7 has been amended to read: “ <i>educational campaign about environmental weeds (including native weeds)</i> ”
28	3.13.1.1 Restore <i>biodiversity</i> and representativeness in priority areas How: <i>Protect the Recommended Areas for Protection identified in PNA reports (see 1.1.2a). Propagate as many of the missing/rare/uncommon plant species of Wellington City as possible. Contract out</i>	<i>Change “species diversity” to “biodiversity”</i> Your detailed comments have been noted and passed on to the relevant officers.

	<i>some species to specialist growers (e.g. Gary James) if there is insufficient capacity at Berhampore Nursery. Adopt a strict policy of collecting seed only from natural populations (not planted specimens) to avoid a genetic bottleneck. Establish and carefully maintain 'seed-source' plantings at strategic locations which will enable appropriate species to spread naturally throughout wider areas.</i>	
28	<i>Enhance biodiversity throughout the City How: Encourage the public to use a wider variety of locally-sourced native plants in their gardens, especially native shrubs and herbs (which are often more suitable for backyards than native trees).</i>	This is the aim of actions 3.1.4, 3.2.1 and 3.2.4.
28	<i>Ensure that good quality Green Space experiences are easily accessible to all Wellington residents.</i>	To involve the whole community in their local network of green space, amend 3.2.2: <i>"Encourage community participation in green and blue network"</i>
28	4.3.6 <i>How: Enhance plant diversity by re-establishing seed sources of the full range of native plants that occur naturally in Wellington City at strategic sites</i>	This action is related to the scientific investigation of climate change. <i>Amend 'how it might be done' of action 2.1.2:</i> <i>"Establish seed sources of full range of indigenous native plants"</i>
28	<i>Ensure WCC is able to rise to the challenge of controlling a wide variety of environmental weeds in difficult situations efficiently and effectively</i>	This is covered under action 4.3.1.
28	<i>Ensure staff have the skills required to enable WCC to implement the Action Plan efficiently and effectively.</i>	This is covered under action 4.3.1.
29	Particularly support focus that biodiversity needs to extend beyond WCC owned land into the community and privately owned areas, as further support for community groups and for implementing other Council plans and strategies.	Your comment has been noted.
29	P19 Perhaps also mention reintroduction to Wellington of species that were once present here but are not presently.	This is covered under action 3.1.1, where flora and fauna transfer and translocations are specifically mentioned.
29	Suggest action to support Corporate Volunteering programme and coordination and promotion of	<i>Expand action 2.5.10 – how it might be done "support and encourage corporate volunteer</i>

	appropriate events for Corporate Volunteers.	<i>programmes”</i>
29	Include action to use existing WCC curbside planting programme to supply native trees for curbside plantings rather than exotics as a matter of policy.	Amend: <i>3.1.7 Review the road reserve scheme to ensure the supply of appropriate native ecosourced species.</i>
29	Priority action should be the full implementation of the pest management plan and associated elimination of possums and feral goats from Wellington Peninsula.	Your comment has been noted.
29	Layout issues: Action Case Study p10 needs to have darker background colour. P14, space missing between 2 nd /3 rd sentence. P16, perhaps a more recent or alternative example of threatened plant protection through traffic island plantings should be provided.	P10 and p14 amended as suggested. <i>The example of threatened plants in traffic island plantings has been changed to Euphorbia glauca and Austrofestuca littoralis at Cobham Drive.</i>
30	Support general direction, objectives and actions.	Thank you for your support
30	Action 3.1.2 is one of the most important. Also needs more attention to water quality aspects through stormwater and sediment controls.	The examination of stormwater and sediment build up is covered under action 4.2.2. This research will feed back into action 3.1.2.
30	Priority is also maintaining integrity of South Coast (scarp and foreshore).	Your comment has been noted.
30	Infilling, piping and culverting in the Owhiro Stream are some of our main problems. This issue should have more emphasis and should be mentioned first and not last in issues for streams. Rubbish is also an ongoing issue and results in pollution.	<i>Amend as suggested – put infilling etc first in issues section. Rubbish included in water quality ‘issues’.</i> <i>3.1.2 clarified to include a catchment focus for open space restoration work (3.1.2a) and infrastructure works (3.1.2b).</i>
30	Strongly endorse objective 2.3	Your comment has been noted.
31	Support general direction, objectives and actions.	Thank you for your support
31	Would like reassurance that the council will follow this plan.	Once approved by Council, this plan will be adopted and become part of Council’s operations, continuing for the life of the plan.
31	Unsure if subdivisions have been addressed.	Subdivisions have been addressed under objective 2.3 by strengthening District Plan provisions for biodiversity protection.
31	Action of protection should have priority with fragmentation issues (subdivisions) requiring urgent attention.	Your comment has been noted.
31	Would like to have seen this publication delivered to all rate payers.	This publication was notified for public consultation in accordance with standard Council practise. It was advertised in the Dominion

		Post, local papers, Council publications, through community groups and community centres and in all libraries and service centres around the city. We apologise if this did not meet your expectations.
32	Headings 'protection' and 'restoration' don't capture everyday basic work. Perhaps reshape theme 2 actions into a theme of 'protect and manage'.	Please also note that these themes and corresponding objectives were developed by an interagency consultation group. They have primarily been a way of organising our thinking. The consultation group had discussions around the issue of management and decided that the successful management of biodiversity can be broken into the two key areas of protection and restoration.
32	Concern over a lack of targets and outcomes	The timeframe itself provides measurable targets and this has now been outlined in the plan. In addition, specific targets have been included.
32	Action Plan not complete without some work on introduced species eg. Management of Botanical Garden pines, policy for long-term management of iconic non-local native species (eg pohutukawa), native/introduced species interactions, long term policy for biodiversity management at Wellington Zoo, sympathetic management of non-native vegetation in rural parts of Wellington for best biodiversity outcomes.	While the key focus of the plan remains indigenous biodiversity, a new section on introduced species has been included. This sits at the end of the profile on Wellington's biodiversity.
32	Further thought in integration within WCC eg development and protection, private and public land, native and introduced species.	Currently actions 4.3.1 (regular forums) and 4.1.4 (biodiversity awareness across City Council practices) cover this, however how effectively this has occurred should be looked into as part of the 5 year review.
32	Timeframe too crowded in first couple of years. Addressing some capacity issues is perhaps most of what can be expected in the first year.	The Action Plan has been as realistically constructed as possible, taking into account staff resources.
32	Clearly specify the 5-year plan	Amend last sentence pg 20 to: " <i>The Biodiversity Action Plan will undergo a comprehensive review, with community consultation, after five year. At which time a revised action plan will be constructed.</i> "
32	Figures in profile of Wellington's biodiversity don't look right (may just	This table has been replaced by a graph in the final plan to illustrate

	illustrate need for good inventory).	the habitat types without needing to use the estimated figures.
32	Weeds will be a critical and growing issue.	Your comment has been noted.
32	Don't ignore biodiversity in urban areas.	The recognition of the importance of urban areas is reflected by its inclusion in the habitat section.
32	SWOT analysis: lack of awareness is a major issue.	<i>Amend as suggested</i>
32	What is the vision for introduced biodiversity and the relationship between native and introduced biodiversity?	While we are introducing a section on introduced species, we feel it is not the role of this plan to determine the vision for introduced biodiversity.
32	Opportunities for seeking private sponsorship and funding and partnership (eg 2.1.2)	Private sponsorship will be sought under action 2.5.10.
32	2.1.3 is an example of need for targets.	Following a number of submissions, targets have been included. This includes targets for pest management derived from the Pest Management Implementation Plan.
32	2.1.10 needs DOC as well.	<i>Amend as suggested</i>
32	2.1.11 Collaboration with MAF is more likely to be with Biosecurity NZ.	<i>Add Biosecurity NZ to list of stakeholders</i>
32	2.3.1 does not make it clear how provisions will be applied (eg through criteria of significance).	<i>Developing criteria of significance as well as/instead of reviewing the Conservation Sites will be discussed with the District Plan team. This has been included under "how it might be done".</i>
32	2.3.3 would need to apply jointly with GWRC	The Greater Wellington Regional Council Regional Freshwater Plan is mentioned under action 2.3.3. <i>Greater Wellington Regional Council have been added as a lead responsibility.</i>
32	2.4.2 and 2.1.10 could possibly be combined. Programme are needed for cross-boundary and tenure (ie private and public).	2.1.10 is about protecting large scale linkages on public land and ensuring cross boundary management. 2.4.2. is about the promotion of funding sources rather than active management. We feel they sit better under separate objectives, although there may be links between them. Many programmes will cover multiple action points.
32	2.5.7 and 3.1.4 private nurseries are key players	<i>Include "work with private nurseries" under 'how it might be done' for both these objectives</i>
32	3.1.2 is high priority. Riparian protection and planting should be specified.	<i>3.1.2 clarified to include a catchment focus for infrastructure works (3.1.2a) and open space restoration work (3.1.2b). Riparian protection and planting has been included under 'how it might be</i>

		<i>done'.</i>
32	4.1.4 District plan team have important responsibilities for this action.	The District Plan team would certainly be included in the promotion of biodiversity awareness.
32	Objective 4.3 needs higher priority and more specific mention of urban weed and pest issues.	<i>Include 'up to date knowledge pest and weed issues' under eg of 4.3.1</i>
33	Support the initiative	Thank you for your support
33	Needs to be recognition that possums and ship rats are a significant predator of birds as well as mustelids	Change order of pest species under issues for lowland forest to put rodents after possums.
33	Greater emphasis on lack of information about Wellington's unique invertebrate fauna and how to protect them.	Finding information on invertebrate communities, along with other biodiversity, is covered under actions 1.1.1 and 1.1.2b. Ensuring up to date information to enable the protection of threatened species is covered under actions 4.3.2, 4.3.3 and 4.3.4. <i>New action 4.3.7 Ensure Wellington City Council has relevant and current information on the requirements of threatened species and their habitats.</i>
33	Greater emphasis on the special and unique invertebrate fauna of Wellington's coast (especially on restoration to allow unique assemblages to return).	Notoreas and speargrass weevil are covered under threatened species for coastal forest and scarp, which only refers to examples of unique invertebrate fauna, giving them great emphasis. Coastal habitats have been recognised as an ecosystem that will receive added protection and restoration under this plan.
33	Mustelids do not sit comfortably in the stream section, if referring to threats of forest birds, possums and ship rats will be more significant.	Change to: <i>Pest animals (possums, hedgehogs, mustelids, cats and rats) are a problem as they prey on native birds and their eggs. Herbivorous pests (rabbits, hares, possums) also eat wetland plants.</i> Also change under 'streams'.
33	Little information on harbour and surrounding waters. Activity within Wellington will significantly impact on this area. Section needs to be expanded using format for previous topics.	<i>Amended as suggested with the inclusion of a case study on sediment control in Wellington Harbour.</i>
33	High biodiversity values, important catchments and ecosystems and priority areas are key issues for the plan and a clear process needs to be developed to identify these areas and values. New action in Theme 1 could address this.	The term 'high biodiversity value' has been changed to better reflect the intention of the plan. We now refer to the ' <i>ecological significance</i> ' of an area. This is defined in the glossary as an area comprising any

		<p>one or more of the following ecological features: representativeness of Wellington's indigenous biodiversity, high diversity of ecological and physical features, degree of natural character, relative size and shape, relative rarity and special features, buffering and connectivity, viability. These ecological features contribute to Wellington's indigenous biodiversity and include consideration of current and potential biodiversity values. Prioritising areas falls under Action 2.1.1. This has been reworded to better clarify how this might be done, but the detail can only be assessed once the Objective 1.1 actions have been completed.</p>
33	<p>2.1.2 sympathetic management may not achieve protection of threatened species. Action needs to be strongly worded to allow for direct management to protect threatened species. In most cases ex-situ protection (management?) is not adequate.</p>	<p><i>Change "sympathetic" to "direct"</i></p>
33	<p>2.1.11 Biosecurity incursions will only be managed by central government if they are new incursions. Council must recognise importance of monitoring, controlling and eradicating pest species not already present in Wellington (eg Argentine ants)</p>	<p>Amend 2.1.11 to: <i>Work with other organisations to support and develop biosecurity incursion response plans.</i></p>
34	<p>Need recognition of Wellington's mosaic of indigenous and exotic vegetation. Exotic trees fill a vital role aesthetically and environmentally.</p>	<p>While the key focus of the plan remains indigenous biodiversity, a new section on introduced species has been included. This sits at the end of the profile on Wellington's biodiversity.</p>
34	<p>Need to recognise the small ecological niches readily overlooked in subdivision development. Not just high biodiversity sites and values.</p>	<p>The intention of the 'green and blue corridor concept' (action 1.2.1) is to pick up the smaller pieces of land that are valuable in a larger context as part of a network. These 'corridors' will cover both public and private land.</p> <p>The term 'high biodiversity value' has been changed to better reflect the intention of the plan. We now refer to the '<i>ecological significance</i>' of an area. This is defined in the glossary as an area comprising any one or more of the following ecological features:</p>

		<p>representativeness of Wellington's indigenous biodiversity, high diversity of ecological and physical features, degree of natural character, relative size and shape, relative rarity and special features, buffering and connectivity, viability. These ecological features contribute to Wellington's indigenous biodiversity and include consideration of current and potential biodiversity values.</p>
34	<p>Challenge is essentially human one meeting of minds between developers, engineers, council and community.</p>	<p>Objective 4.1 is designed to ensure a consistent city-wide approach to biodiversity issues. Action 4.1.2 is designed to work with other organisations, 4.1.4 is intended to educate and inform council officers and contractors and 4.1.6 is about informing the community. This is all to occur in a constructive and positive manner.</p>
34	<p>High biodiversity – plan should also recognise and address the sites of lesser biodiversity values which have potential to be enhanced</p>	<p>The intention of this plan is to actively protect and restore a full range of Wellington's ecosystems and ensure these are in a healthy state – in accordance with objectives 2.2 and 3.1.</p> <p>The term 'high biodiversity value' has been changed to better reflect the intention of the plan. We now refer to the '<i>ecological significance</i>' of an area. This is defined in the glossary as an area comprising any one or more of the following ecological features: representativeness of Wellington's indigenous biodiversity, high diversity of ecological and physical features, degree of natural character, relative size and shape, relative rarity and special features, buffering and connectivity, viability. These ecological features contribute to Wellington's indigenous biodiversity and include consideration of current and potential biodiversity values.</p>
35	<p>Concern that the plan does not fully accord with the NZBS: maintain and restore a full range of remaining natural habitats and ecosystems to a healthy functioning state; maintain and restore viable populations of all indigenous species and subspecies across their natural range. It does not restrict itself to</p>	<p>The intention of this plan is to actively protect and restore a full range of Wellington's ecosystems and ensure these are in a healthy state – in accordance with objectives 2.2 and 3.1.</p> <p>The term 'high biodiversity value'</p>

	<p>maintaining site of high biodiversity or threatened species only. Plan is limited in vision by restricting proposed sites to areas of high biodiversity in first instance.</p>	<p>has been changed to better reflect the intention of the plan. We now refer to the '<i>ecological significance</i>' of an area. This is defined in the glossary as an area comprising any one or more of the following ecological features: representativeness of Wellington's indigenous biodiversity, high diversity of ecological and physical features, degree of natural character, relative size and shape, relative rarity and special features, buffering and connectivity, viability. These ecological features contribute to Wellington's indigenous biodiversity and include consideration of current and potential biodiversity values. Action 2.1.1 has also been reworded to reflect this.</p>
35	<p>NZBS requests authorities to protect maori interests in biodiversity and to build and strengthen partnerships with iwi and hapu to conserve and sustainably use indigenous biodiversity. Fails to engage Maori interests directly.</p> <p>No specific action points to ensure that local iwi interests are being catered for...suggest: 2.5.15 Work with local iwi to develop awareness of their interests in Wellington's biodiversity and 2.5.26 involve local iwi in all conservation initiatives</p>	<p>Actions 1.3.2, 2.1.5, and 3.1.5 specifically mention the need to work with iwi to protect and restore areas of indigenous biodiversity which are important to Maori. Maori interests will also be included as part of the wider community under objective 2.5.</p> <p>However, include new action point: <i>2.5.15 Ensure local iwi have the opportunity to be involved in conservation initiatives</i></p> <p>Please note that Ngati Toa had representation on the steering group and the Tenth Trust was involved in discussions and kept informed through a steering group representative from Treaty Relations.</p>
35	<p>Problem that focus of plan is a list of actions currently being carried out by the Council rather than a clear outline of how the WCC will maintain biodiversity in Wellington.</p>	<p>One of the purposes of this plan has been to coordinate Wellington City Council's current biodiversity activities, as well as identifying and prioritising additional actions. There are many aspects involved in managing biodiversity. It was decided by the steering group that the form of the action plan was the clearest way of outlining these actions, with objectives sitting above them to give direction.</p>
35	<p>Four key actions necessary are: establish</p>	<p>Your comments have been noted.</p>

	state of Wellington's biodiversity, identify and rank site, species an ecosystems for protection/restoration; protect priority sites; maintain and restore threatened species and ecosystems	
35	Other important actions are: provide biodiversity information to Council staff and general public; work with private landowners to protect land with high biodiversity values; control pest plants and animals; establish clear targets an standards for biodiversity work; monitor biodiversity indicators.	Your comments have been noted.
35	Support 2.1.1 in placing greatest effort in protection for species, habitats and ecosystems that are poorly represented in the Protected Areas network, or whose extend is considerably diminished. These would include: remaining remnants of coastal forest; coastal shrublands and herbfields (including grey scrub), remaining manuka/kanuka shrubland; freshwater fish habitat; only remaining salt marsh; other wetlands; Tapu Te Ranga Island; coastal dunes ad ravel fields from Owhiro Bay to Karori Stream	Coastal areas and freshwater habitat are definitely recognised as priorities for biodiversity protection in Wellington City. Your specific suggestions have been recorded.
35	Four themes are confusing as are different to NZBS. Themes are treated as goals by other Councils and we recommend this term.	The goals of other Councils are more aligned to the objectives in the action plan. We inserted themes above these objectives to help further organise our thinking.
35	Second theme: protect is too large and unwieldy. Actions 2.4-2.5 would better be treated under a new heading of 'inform'.	The actions under objective 2.4 and 2.5 contain practical work as well as providing information. The ultimate aim of each of these actions is to protect our biodiversity. There are a lot of actions required to achieve this aim.
35	Objective 1.1. Replace with title that identifies action eg Establish the state of Wellington's biodiversity	The overall theme of this section, as outlined on page 19, is to identify the state of Wellington's biodiversity.
35	Additional action points for 1.1: carry out field survey of "gaps", establish systems to keep information up-to-date	Amend: ecological <i>field</i> survey to fill gaps under 'how it might be done' for the technical report (action 1.1.1)
35	The most important activity following above actions is: identify and rank sites, species and ecosystems for protection and/or restoration	Your comment has been noted.
35	Action 2.1.1. should read <i>Protect priority sites</i> Objective 2.2 – unnecessary see proposed action 2.1.1	Action 2.1.1 refers to the need to first prioritise the order in which the sites will be protected. Action 2.2.1 refers to the protection of those priority sites. It is important to first identify the sites, then prioritise

		them, then protect them. Otherwise this plan will be very hard to implement.
35	Action 2.1.2 should not be restricted to threatened species: reword to: maintain and restore threatened species and ecosystems.	Action point 2.1.1 refers to threatened ecosystems. It was felt that species and ecosystems each deserved their own action points.
35	Action 2.1.3 control pest plants and animals – do not restrict to high biodiversity sites only	<p>The term 'high biodiversity value' has been changed to better reflect the intention of the plan. We now refer to the '<i>ecological significance</i>' of an area. This is defined in the glossary as an area comprising any one or more of the following ecological features: representativeness of Wellington's indigenous biodiversity, high diversity of ecological and physical features, degree of natural character, relative size and shape, relative rarity and special features, buffering and connectivity, viability. These ecological features contribute to Wellington's indigenous biodiversity and include consideration of current and potential biodiversity values.</p> <p>Wording for action 2.1.3 changed to:</p> <p><i>Control pest plants and animals in accordance with the Pest Management Plan 2005</i></p>
35	Action 2.1.5 write management plans for all areas of public land identified in Objective 1.	<p>Amend to:</p> <p><i>Create ecological management plans for all areas of ecologically important public land, as identified in objective 1; linking with local community groups and iwi where applicable.</i></p>
35	Action 2.1.6 work with private landowners to protect land with biodiversity values	<p>The actions are designed to be as specific as possible to ensure they can be effectively implemented. This action relates directly to the need for certain areas to have ecological management plans to enable their ongoing protection.</p> <p>Amend to:</p> <p><i>Work with private landowners to create ecological management plans for areas of ecological significance on private land, as identified in objective 1</i></p>
35	Action 2.1.7 ensure biodiversity values are identified and protected in all reserve	<i>Amend as suggested</i>

	management plans	
35	Action 2.1.11 Develop a biosecurity response plan for WCC	Amend 2.1.11 to: <i>Work with other organisations to support and develop biosecurity incursion response plans.</i>
35	Objective 2.3 – recommend extending to encompass any site that possesses biodiversity values deserving of protection (not high value only)	The term ‘high biodiversity value’ has been changed to better reflect the intention of the plan. We now refer to the ‘ <i>ecological significance</i> ’ of an area. This is defined in the glossary as an area comprising any one or more of the following ecological features: representativeness of Wellington’s indigenous biodiversity, high diversity of ecological and physical features, degree of natural character, relative size and shape, relative rarity and special features, buffering and connectivity, viability. These ecological features contribute to Wellington’s indigenous biodiversity and include consideration of current and potential biodiversity values.
35	Add new action point: provide biodiversity information to all council staff and the wider community	This has been recognised as important and is covered under actions 4.1.4 (Council staff) and 4.1.6 (community). The community is also covered under objectives 2.5 and 3.2.
35	Actions 2.5.8 and 2.5.13 need to start with verbs. Eg. Provide training for groups carrying out biodiversity work	Amend: 2.5.8 <i>Provide education and skills..”</i> 2.5.13 “ <i>Create initiatives to promote</i> ” To clarify 2.5.13, it is about creating links between recreation and biodiversity opportunities. For example, promoting people exercising in our open spaces and reserves or promoting them to get exercise by getting involved in community planting projects.
35	Action 3.1.1 Restore sites, species and ecosystems identified in Objective 1.	This follows on from action 2.1.1 which refers to objective 1. These progressive steps have been outlined to enable the successful implementation of this plan.
35	Action 3.1.2 extend to include all streams in Wellington	3.1.2 clarified to include a catchment focus for all open space restoration work (3.1.2a) and relevant infrastructure works (3.1.2b) based

		on community and Council priorities. In addition, stream restoration work will be addressed through the blue and green network plan (3.1.3).
35	Change research theme to: Research and Monitor	In this document, monitoring is recognised as a component of ongoing research.
35	First objective should be: monitor identified biodiversity sites and species	As above
35	Actions 4.1.3, .4 and .6 should be moved to other theme eg 'Protect' or our suggested Goal 3 'Inform'	As above
35	Most actions points in 4.3 can be placed into one action point: 4.3.2 Develop relationships with research organisations. Add: 4.4 involve local iwi in the monitoring of cultural harvest sites; 4.5 Involve local iwi in research of species and sites of interest to them.	Action 4.1.5 has been amended to: <i>Explore opportunities for community involvement in research, including monitoring</i> Amend "how it might be done" of this action to include " <i>involve local iwi in the monitoring of cultural harvest sites and research of sites and species of interest to them</i> "
35	Key action needed is: 4.6 Review findings from research and monitoring to inform future actions.	This feedback loop has been recognised as being very important. It is covered under action 4.2.3.
35	Introductory material: High level of endemism is also due to rapid evolution in some groups over comparatively recent times – and reflects the diverse habitats and climates present over the last few million years...not just ancient survivors in our old-growth forests that define NZ's unique biota, but our varied landscapes and habitats that account for much of biodiversity	Amend section to: " <i>...is largely the result...</i> " and " <i>...land masses, diverse habitat and climates, allowing unique...</i> "
35	Endemism in NZ's ferns is much less than that of flowering plants – closer to 50% than 80%.	This statistic was taken from the New Zealand Biodiversity Strategy – which states that around 80 percent of our vascular plants (which includes ferns, flowering plants and trees) are endemic. To clarify that we are talking about vascular plants as a whole group amend to: <i>"This is also true for 80 percent of our vascular plants (which includes trees, ferns and flowering plants)..."</i>
	Most trees in NZ are flowering plants.	Although most trees in New Zealand are flowering plants, it is listed separately to include the many endemic flowering plants that are not trees.
35	Issues for lowland forest: all introduced mammals are an issue for native plants	Amend: " <i>Introduced mammals (eg possums etc)</i> "

35	Sheep and cattle should be added to the list of animal pests...	<i>Amend as suggested</i>
35	Streams: Incorrect to assert that the wilderness rural streams are characterised by a lack of streamside vegetation.	Rephrase: <i>Rural streams include lower Karori Stream, Makara Stream and Ohariu Stream – as well as some of the more remote or ‘wilderness’ streams such as Oteranga Stream. Much of the country associated with these rural streams has a long history of farming and grazing, and these streams are often characterised by a lack of streamside (riparian) vegetation. Some rural streams (eg Waiariki and Opau streams) also flow through areas of fragmented or regenerating bush.</i>
36	Amend title to “Indigenous Biodiversity Action Plan” reflecting New Zealand’s commitments to Agenda 21 and NZBS as well as text of draft plan Under outcomes in bullet points 1, 3, 4 and 6 – insert the word indigenous before the word biodiversity Insert bold text at foot of page 1 stating “In this document, all references to biodiversity refer to indigenous biodiversity”	The references to biodiversity have been clarified within the text of the document. Due to a number of other submissions, a short section on introduced species has also been included.
36	Commend efforts of Berhampore Nursery to supply appropriate eco-sourced plants for revegetation	Thank you for your support
36	The text below the table on page 7 be clarified to: "Each of these habitats supports a unique community of species and faces a different range of threats".	<i>Amend as suggested</i>
36	Suggestion: The existing literature on indigenous ecosystems in the city should be listed as an appendix to the plan, or in another form that is readily available to WCC staff and the public. This will alert readers to indigenous ecosystems that have been studied, and more importantly, to those which have not been studied (examples given in submission).	The existing literature will be collated as part of objective 1. This table will certainly be made available to Council staff and the public in accordance with action 4.1.6.
36	The following document be cited in the lowland forest section, by means of a footnote, or placed in an appendix to the plan: Native forest remnants of Wellington City – a survey of five sites. 1985. Shona C. Myers	Thank you for your comprehensive list of references. These, along with others, will be listed as an appendix in the technical report developed under action 1.1.1.
36	Development pressure be added to the	Amend ‘clearance’ to:

	"Main issues for scrub and shrublands"	"than mature forest. <i>This often happens as a result of development. However...</i> "
36	The following documents be cited in the scrub and shrubland section, by means of a footnote, or placed in an appendix to the plan: Botanical reconnaissance of the farm property sold to WCC by Brian Kilmister. 1999. B.J.Mitcalfe and J.C.Horne. Report for WCC. Ecological survey of land south of Skyline Reserve, Karori. 2003. B.J.Mitcalfe and J.C.Horne. Report for WCC.	To be included in technical report - as above
36	Elimination of feral goats in rural Wellington is essential, and possible. Co-operation between WCC, GWRC, DOC, QEII National Trust, Meridian Energy Ltd, and rural landowners, must be fostered to achieve this objective, as a matter of urgency	Your comment has been noted.
36	Pohutukawa should be added to the "Weeds" paragraph in "Main issues for coastal fringe", because its seeds germinate on cliffs. Council should refrain from planting pohutukawa on the south coast, and endeavour to discourage people living near the coast from planting it.	Action 2.1.9 has been amended to remove the reference to exotic vegetation, so it now covers all vegetation that threatens our indigenous biodiversity. The 'how it might be done' section of action 2.5.7 has been amended to read: <i>"educational campaign about environmental weeds (including native weeds)"</i>
36	The following documents be cited in this section, by means of a footnote, or placed in an appendix to the plan: Scientific study of vehicle impacts on Wellington's south coast. 1998. Harrison Grierson Consultants Ltd. On behalf of WCC. Makara Foreshore Reserve. 1997. B.J.Mitcalfe and J.C.Horne. For WCC. Ecological survey of the Wellington South Coast. 1996. D.J.Campbell, I.A.E.Atkinson, L.Northcote, Ecological Research Associates. Prepared for WCC Culture and Recreation Division. Wellington coast from Owhiro Bay to Oriental Bay – enhancement and restoration. Draft report. 1996. Annie Bedard, Landscape Architect, WCC.	To be included in technical report - as above.
36	Hue te Taka be considered for addition to the offshore island section, - it is an island	Hue te Taka is recognised as a peninsula as opposed to an offshore

	at high tide	island.
36	The following documents be cited in the offshore island section, by means of a footnote, or placed in an appendix to the plan: Botanical survey of Tapu Te Ranga Island, Island Bay, Wellington. 2003. B.J.Mitcalfe and J.C.Horne. For WCC. A terrestrial biological and ecological survey of Hue-te-Taka Peninsula, south Wellington coast. 1992. P.J.Brownsey, Department of Natural Environment, Te Papa.	To be included in technical report - as above.
36	The document should mention the raupo wetland in Opau Valley, Makara Farm, the carex wetland in Hawkins Gully, Makara, and the wetland in Takarau Gorge, Owhariu Valley	<i>Amend as suggested</i> "usually characterised by raupo, purei and harakeke. <i>These include a raupo wetland in Opau Valley, a carex wetland in Hawkins Hill and a wetland in Takarau Gorge.</i>
36	We trust that Plan Change 56, "Managing infill housing development", will ensure the protection of lowland forest scrub, and shrubland in areas proposed for subdivision.	Action 2.3.1 is to increase regulatory protection for all ecologically significant areas. Action 2.3.5 ensures existing biodiversity is conserved and enhanced on proposed development sites.
36	The following "Main issue" be added to the urban area section: "Pest animals: Introduced animals including possums, feral cats, rodents, mustelids and hedgehogs are individually, and in combination, a major threat to indigenous biodiversity	Amend: <i>Pest animals: Cats (both feral and domestic), rodents, possums and hedgehogs are commonly found in urban areas. Individually, and in combination, these pose a major threat to indigenous biodiversity. Dogs also pose a threat, particularly to our indigenous birdlife in urban coastal areas.</i>
36	We note that pest animal control, and pest plant and weed control, do not receive adequate funding, given the enormous threat they pose to indigenous ecosystems, and part-indigenous ecosystems	Your comments around this as a priority have been noted. Where additional resources are required they will be applied for through the annual planning process.
36	An additional issue (under SIO) is the slow progress in gazetting as Recreation Reserve, or Scenic Reserve, certain lands held by WCC in fee simple. An example is 86-94 Madras Street, Khandallah. It is in regenerating forest contiguous with Tyers Stream Reserve.	Action 2.2.2 intends to reclassify ecologically important Wellington City Council owned areas as vested reserves over the next three years. This will offer more protection to these areas.
36	The action plan be simplified by reducing the number of actions, by combining closely related ones. This will make the document easier to understand, and to implement.	Although there are many links between different actions, the act of combining them makes them less specific. If the actions are less specific they are harder to

		implement.
36	Objective 1.1 1.1.1, 1.1.2a, 1.1.2b. This work, crucial to the success of the plan, should be funded so that it can begin as soon as it is approved by Council.	Your comments have been noted.
36	1.2.1 should be funded in year 1, because observations made during desktop collation work in the above actions will help to identify ecological linkages.	The timeframe for this Action Plan has been constructed as realistically as possible. Achieving as many actions as possible while taking into account funding and staff resources from the various lead responsibilities. Some actions begin in year 1 as they are already underway. New actions needed to be prioritised. Objective 1.2 will be a direct follow on from objective 1.1.
36	1.3.1 should be funded in year 1, and also in following years. Human impacts will be revealed during the ecological research in action 1.2.1.	As above
36	Landcare Research be added to the list of agencies under 2.1.4	The involvement of the Crown Research Institute, Landcare Research, will be considered by the project team if required.
36	2.1.5. should begin in year 1, so that plans are available to guide the work	Action 2.1.5 will follow on from the work in objective 1 and action 2.1.1 therefore is scheduled to happen from year 2 onwards.
36	2.1.6. should begin in year 1, because loss of indigenous biodiversity on private land is at least as big a concern as that on public land. 2.4.1a, 2.4.1b, 2.4.2. should begin in year 1, to hasten the protection of indigenous biodiversity on private land.	The protection of biodiversity on both private and public land has been recognised as important. Proactive work on 2.1.6 will be informed by actions 1.1.1 and 1.1.2 (year 1). Timeframes are a balance between managing priorities and creating a realistic work plan.
36	2.1.7. is a crucial element of management plans.	Your comment has been noted.
36	2.1.8. - the checklist/guidelines be given "teeth" in the District Plan.	This action is specifically about educating people as they are working through the resource consent process, as opposed to providing regulatory protection.
36	2.2.1. should begin in year 1.	This action can only be implemented after 1.1.1, 1.1.2 and 2.1.1 (year 1 priority).
36	2.3.5. should begin in year 1.	As above
36	3.2.1. should begin in year 1.	Based on priorities identified in 1.2.1, 1.3.1 and 2.1.1 (years 1 and 2).
36	3.2.2a, 3.2.2b should begin in year 1.	As above
36	4.1.1-4.1.6. are tasks which follow research. Consideration should be given to including them in related actions.	In this document, monitoring is recognised as a component of ongoing research.

	<p>Consideration be given to including 4.2.3 in a related action, because it does not involve research.</p> <p>4.3.1-4.3.6. are tasks which follow research. Consideration should be given to including them in related actions.</p>	<p>Please also note that these themes and corresponding objectives were developed by an interagency consultation group. They have primarily been a way of organising our thinking. Many of the actions relate to more than one theme.</p>
36	4.2.1. - Consideration be given to involving Landcare research/Manaaki Whenua in this work.	Landcare Research will be one of the key organisations involved in the collaborative approach.
36	"Global change" needed: e.g. is the standard abbreviation of "for example", not 'eg'.	This is the recognised way in which Council writes this abbreviation.
36	Support: vision, introduction, description of habitat types, the acknowledgement that development pressure threatens our lowland forest, the acknowledgement that lack of information is a threat to our scrub and shrublands, acknowledging that karo is a threat in coastal ecosystems, comments on harbour and coastal waters and surrounding districts, all other actions not specifically mentioned	Your comments have been noted.
37	Supports general direction of the plan	Thank you for your support
38	P6 lowland forest – the role of regenerating forests in providing a buffer to “old Forest” remnants should be acknowledged here. Eg change to “accompanied <i>and buffered by</i> regenerating forest”. Also mention that regen buffers reduce the effects of fragmentation.	<i>Amend as suggested</i>
38	Add some threatened plants to lowland forest threatened species.	This overview is not intended to be a comprehensive list of threatened species, rather a case study of issues.
38	Main issues for lowland forest – mention the threat by inappropriate reveg practices such as the use of non-ecosourced plants to the ecological integrity of the city’s natural ecosystems	<i>Amend as suggested</i>
38	Include prostrate kowhai and manuka in grey scrub	<i>Amend as suggested</i>
38	Change: “small-leaved shrubs are less common in gorse <i>than in manuka/kanuka shrubland</i> ”	<i>Amend as suggested</i>
38	Change: “eat out <i>palatable</i> native shrubs”	<i>Amend as suggested</i>
38	Under fire threat - mention that manuka and kanuka are particularly flammable species	<i>Amend as suggested</i>
38	Coastal forest and scarp, change: “both with <i>a complex mosaic</i> of scree...”	<i>Amend as suggested</i>
38	Add that a man-made pond is not normally considered to be a wetland	<i>Amend as suggested</i>

38	Pest animals - koi carp not huge pest fish in Wellington, speak to Nadine Gibbs (DoC) to find more relevant species.	We have spoken to Nadine Gibbs from the Department of Conservation and she has confirmed that koi carp are the main pest fish of concern in the Wellington region.
38	Opportunities, add: “provide both regulation and education and incentives for protection and enhancement”	<i>Amend as suggested</i>
38	Vision – protect (pg 19): change “through District Plan and <i>input into regional plans</i> ”	<i>Amend as suggested</i>
38	Explain funding source – eg A004 means nothing	<i>Funding source explained further in intro section to action plan on pg 20</i>
38	1.1.1 change: “ecological <i>field</i> survey to fill gaps”	<i>Amend as suggested</i>
38	Obj 2.3 – highlight the need for caution in an over-reliance on high level data sources such as LENZ that are subject to error at the fine detail – there is no substitute for good ground-truthed data!	<i>Change of wording for Action 2.1.1 to reflect relative importance of LENZ data.</i> The LENZ data will be only one tool that is used while making these decisions. The majority of the weighting will be from the data gained through objective 1.1.
39	Simplify the description/definition of ‘biodiversity’ to “the totality of genes, species and ecosystems of a region”	To avoid confusion, we used the most widely accepted definition for biodiversity, and the nearest thing to a dictionary definition – which comes from the Convention on Biological Diversity.
39	Many of proposed objectives should be included in the District Plan because of our commitment to Agenda 21	Point noted.
39	Actions should be supported with more detail on monitoring to assess current biodiversity and monitoring outcome of actions. The explanation of ‘data collection’ and its application could be expanded.	Much of the monitoring detail and methodology for data collection has not yet been worked out. This will come as a result of action 4.2.1. Action 4.2.3 will then ensure this monitoring is used to assess and review the actions.
39	Expect that the indices chosen for monitoring will include those applicable to native forest reserves	When the monitoring methodology is finalised, it will certainly include systems applicable to all ecosystem types.
39	The monitoring of areas to initially determine species richness and diversity within chosen ecosystems and between ecosystems is a priority	Your comment has been noted.
39	Experience, knowledge and conservation urgency should alter time frames	The timeframes for the protection and restoration of different areas will be determined by the knowledge of conservation urgency gained through objective 1.1. Further knowledge and experience gained through research and monitoring

		will also feed back into the ongoing work.
39	The glossary could be extended as a learning experience for many	New additions to the glossary have been made as a result of submissions.