

12 March 2020

Ministry for the Environment  
23 Kate Sheppard Place  
Pipitea  
**WELLINGTON 6011**

Tēnā koutou,

**Palmerston North City Council's submission on the Ministry for the Environment's  
'He Kura Koiora i hokia: A discussion document on a proposed National Policy Statement for Indigenous  
Biodiversity'**

Thank you for the opportunity to provide a submission on the Ministry for the Environment's (MFE) 'He Kura Koiora i hokia: A discussion document on a proposed National Policy Statement for Indigenous Biodiversity' (the NPSIB). Palmerston North City Council (PNCC) supports the intent of the NPSIB and supports halting the decline of indigenous biodiversity in New Zealand.

**Summary**

PNCC understands the need for an NPSIB and its value for New Zealand. However, there are concerns about the implementation of the proposal, due to its ambition. PNCC considers that some changes are necessary to achieve the envisaged outcomes and that some of the requirements of the NPSIB need reconsideration. In particular, there are concerns about the benefit of requiring 10% of urban areas to have native vegetation coverage. This is an unrealistic expectation in Palmerston North and potentially other locations, where historic land-use decisions have made a requirement like this significantly challenging to achieve. Discussion and other amendments are outlined in the submission below.

**Palmerston North—Context**

Palmerston North is a geographically small territorial authority (TA). In comparison to many other regional TAs, Palmerston North is highly urbanized, with about 25% of our land area being urban and the remaining 75% rural. Historic land-use decisions have led to significant deforestation. Outside of the Tararua Range, there is less than 1% of original native bush cover in Palmerston North. What remains is largely fragmented, small in size, and in variable states of health. PNCC has protected some of the most valuable sites of local significance through its District Plan. These have been spatially defined and are known to the public. This approach differs to the Regional One Plan, which only defines what should be protected in a descriptive manner. PNCC has also invested in a nationally recognised ecological restoration project, called Green Corridors. This project aims to create green corridors of eco-sourced native plantings from the Tararua Range to the Manawatu River. This has been focused along streams and gullies in the peri-urban environment and some greenfield growth areas. Since 2001, over 150,000 native eco-sourced trees have been planted.

## Issues

### Mapping SNAs

We support the requirement to map SNAs. While there is value in the approach adopted by the Manawatu-Whanganui Regional Council's One Plan, PNCC considers that more can be done to provide appropriate protection for significant indigenous areas. An SNA approach makes it very clear where protection should apply. Appendix 1 of the NPSIB will provide a useful assessment framework for informing decisions about what should be protected.

The One Plan relies on a mix of statutory and non-statutory methods to protect, maintain, and enhance biodiversity. While there are benefits to this approach, one limitation is its lack of clarity for the general public on what definitively constitutes a rare or threatened habitat and where they are located. Thus, the One Plan is more reactive than proactive. From a natural justice perspective, the One Plan approach has provided limited opportunity for affected landowners to understand that a feature of their property has a protected status. It is highly likely that significant biodiversity sites have been modified or destroyed without the knowledge that they have a One Plan protection status. While there is no guarantee that modification or destruction would have been avoided if an area was mapped, it is more likely that a landowner would know that a protected site exists on their property if it was mapped in the One Plan process.

PNCC supports the proposal to introduce SNAs as a protection method. However, we do not have the ecological expertise internally to conduct in-house assessments. We would need to contract this work out. All other TAs in the region will be in the same position. There would be merit in having the regional council co-ordinate the identification of SNAs and have the district and city councils implement the findings in their District Plans given this expertise already exists at the regional council level. The regional council also has existing landowner relationships from co-ordinating non-statutory protection initiatives like fencing subsidies and riparian planting support. Trying to duplicate these functions across all TAs would not be efficient or effective.

The SNA approach would significantly increase the wider public's understanding about what is protected and what is not. It would also provide a flag to TAs when processing subdivision applications or land-use consents (where activities are most likely to result in adverse effects). Under current practice, this is likely to be missed, as biodiversity regulation largely rests with the regional council, which is usually absent from land-use or subdivision consenting considerations at the district or city council level.

PNCC appreciates mapping SNAs will require a significant amount of ecological expertise and a high evidence threshold to justify protection in a Regional or District Plan. The capacity and capability may not be readily available in New Zealand. PNCC also appreciates this requirement would place significant demands on smaller rural authorities who are already struggling to meet their RMA obligations. There may be some value in investigating what technology is available to identify and map SNAs from aerial photography. SNAs identified with a high level of certainty could have stronger protection whereas SNAs identified with a lower level of protection could act as a trigger for further investigation, similar to the current One Plan approach.

The most appropriate planning method to identify and protect SNAs is difficult and needs to be carefully considered. While PNCC support the intent of the NPSIB and mapping of SNAs, delivery of this method will be very challenging.

#### Requirement to review plans every two years

The proposal to require councils to update their plans within two years of a potential SNA being confirmed as meeting the NPSIB Appendix 1 criteria is not supported. This is likely to prove overly onerous and unnecessary for many councils. Where an area meets the criteria of Appendix 1, the SNA requirements of a plan will already apply. This provides scope to apply consent conditions and monitoring requirements to ensure the outcomes sought in the NPSIB and/or local plan are achieved. Furthermore, a plan must be reviewed every 10 years. A more frequent review can be initiated sooner, if deemed necessary. Initiating a plan change process when many SNA's have been identified would be a more effective and efficient option. Plan changes, even discrete ones, are expensive. Other pressing priorities, such as releasing enough land for urban development should take precedence, especially when the NPSIB already provides the means to protect biodiversity in the absence of a plan change. Councils are better placed to determine what their District Plan priorities are and what aspects need to be reviewed.

#### 10% urban coverage requirement

In the NPSIB, it is unclear what an urban or rural area is and what coverage is considered to be sufficient to meet the 10% threshold. There is uncertainty whether the 10% can include street trees or whether it is restricted to functional ecosystems in places like bush remnants or reserves.

If there is insufficient coverage, it is unclear whether PNCC is expected to use public land to increase coverage or whether there is an expectation that PNCC will introduce District Plan provisions for development that will progressively increase the amount of native vegetation cover as a condition of development.

If the expectation is for councils to lead the increase in coverage, it could be difficult to achieve. Many native tree species are considered inappropriate in park spaces because they struggle to establish and thrive as stand-alone trees. Few native trees are appropriate street tree species due to their evergreen nature, slow growth profile, and their need to grow in groups to thrive successfully. Furthermore, thick plantings of vegetation are often discouraged in public spaces due to safety and security concerns (Crime Prevention Through Environmental Design principles). This severely limits opportunities to significantly increase meaningful native tree coverage in urban areas.

It is our view that the 10% indigenous vegetation coverage requirement for urban areas is impractical in Palmerston North. The research underpinning the 10% threshold suggests that the 10% coverage should consist of functional ecosystems or create links between them. This is not what the NPSIB requires. Instead, a 10% requirement is sought across the entire urban area. Scientifically, this is an unnecessary policy, and should be replaced with more tailored and need-specific alternatives.

If the current approach in the NPSIB is retained in the final version, there will be limited options to achieve this in Palmerston North. Our urban areas are devoid of large areas of indigenous bush due to significant historical felling and clearance of native vegetation to enable the development of an agriculture-based economy. Some bush remnants exist in some of our city parks; however, these constitute a fraction of the wider urban environment. There is less than 1% of indigenous bush cover remaining in the district (excluding the Turitea Reserve).

Palmerston North's urban area is 4567 hectares. A 10% coverage would therefore require 456.7 hectares of native coverage. According to the Manaaki Whenua land cover database, native vegetation only makes up 135 hectares in the urban area. That means that Palmerston North would need to increase urban coverage by more than 300%. To put this into context, if Palmerston North transitioned all of its 14,000 street trees to

natives, we would only increase the urban coverage by 42 hectares. Furthermore, if a planting programme was introduced to provide one native tree per residential property, we would only add another 90 hectares to the coverage. This would likely cost in excess of \$2.5 million and another 200 hectares of native cover would still need to be found. The requirement is impractical for many in New Zealand.

Our suggestion is that the 10% urban threshold be removed entirely. It would make more sense to require a district-wide threshold and to focus on the expansion of functional ecosystems, which in our case, is predominantly located rurally.

#### Māori values

It appears that Appendix 1 is exclusively relevant to the role of an ecologist. The assessment methodology contained in Appendix 1 contains no criteria related to Tangata Whenua identified taonga. It is unclear how Tangata Whenua will meaningfully influence the identification of SNA's if their considerations are not formally part of assessment methodology. It is suggested that some Tangata Whenua criteria be included in the Appendix 1 methodology.

We look forward to further discussions about the NPSIB. Should you have any questions or require any technical information from us, please send your enquiries through to Senior Planner, Michael Duindam at [michael.duindam@pncc.govt.nz](mailto:michael.duindam@pncc.govt.nz).

Kind regards



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