

Submission



To: Ministry for the Environment
From: Hauraki District Council
Date: Friday, 13 March 2020
File reference: Document: 2729152
Subject: **National Policy Statement for Indigenous Biodiversity**

The Council welcomes the opportunity to make a submission on the Draft National Policy Statement for Indigenous Biodiversity.

In general, the Council supports the Local Government NZ Submission.

Council's submission consists of two (2) parts – an overview and more detailed responses to specific provisions – guided by the questions in the discussion document.

Overview:

- The Council supports the need for, and overall purpose, of the proposed NPS. It recognises that biodiversity continues to be lost or degraded and that greater action by all – central and local government and landowners, is required to halt the decline, and certainly to reverse it.

The Council however has significant concerns about the very broad scope of the proposed NPS and its affordability at each level, and particularly at territorial authority level.

While we have already mapped and scheduled SNAs we would have to employ an ecologist to review the schedule against the criteria in Appendix 1 and to rank each one 'medium' or 'high'.

It is not clear if this could be undertaken solely as a desk top exercise or would require ground truthing to be undertaken. Therefore, while we would expect our costs would be at the lower end of the range given in the section 32 Report and Cost Benefit Analysis, the actual cost is still very uncertain, and the indicative cost magnitude is still of significant concern.

The uncertainty over costs is increased by the, as yet unknown, requirements that would be placed on Council due to amendments to the Waikato RPS.

In addition, this proposed NPS and its requirements and costs needs to be considered in the context of all of the national direction coming from Central Government – requiring implementation in the next five (5) years. This includes national direction on freshwater, urban development, highly productive land and air quality. Alongside this

are the existing challenges of infrastructure upgrades and expansion, climate change adaptation etc.

Not everything can be achieved in the timeframes intended – even if Councils had the financial resources to undertake all the work involved.

The combined financial costs will make achievement of all required work significantly beyond Council's resources.

- Significant, and ongoing, central government funding would be required, otherwise the laudable outcomes on maintenance, protection and enhancement of biodiversity will not be achieved.

This funding is needed not only for local authorities, but also for tangata whenua and landowners.

- While the Council generally supports the LGNZ submission – which asks that the NPS be focused on protection and maintenance, it believes that restoration is equally important and, if not included in the NPS still needs to be provided for. It could be included in the NPS, but with extended timeframes for commencement of the provisions relating to this aspect.
- General education of landowners about the NPS and provisions that will affect them will be needed as it is probably fair to say that awareness of any NPS in the general population is probably not great.

Even for landowners who are supportive, or generally supportive, of the aims of the NPS a lack of knowledge of its provisions could result in failure on the ground.

A nationwide education and publicity campaign could best be developed at a national level to ensure consistency and completeness of messages.

Local Authorities can then develop material specific to their implementation of the NPS.

On the ground success will only be achieved if landowners actively carry out pest control (animal and plant pests), and other required management activities to ensure SNAs and other indigenous vegetation does not "disappear" or degrade by "neglect".

Pest control is expensive – landowners will need to be able to apply for funding from central government to assist with this.

District Plan rules cannot require landowners to carry out active management activities. District Plans can only map and schedule SNAs and include rules to control the modification or destruction of SNAs and indigenous vegetation outside SNAs.

Should it be intended that TAs are also responsible for requiring active management of SNAs/other indigenous vegetation, clear mechanisms need to be put in place through the Local Government Act which provide TAs with powers to achieve this.

In addition, the monitoring regime that would be required – property specific site visits, would be prohibitively expensive for TAs, and would need to be funded by Central Government, as it would require a substantial labour force.

While the proposed NPS states that local authorities may provide incentives for restoration and enhancement the cost of a meaningful level of incentives is also likely to be beyond the ability of Councils to provide eg assistance with fencing and pest control.

This would only leave non-financial incentives eg ability to create extra lots. From this Council's experience (having included such rules in its District Plan – operative September 2014) such incentives are only very rarely taken up.

Q1 *Do you agree a National Policy Statement for Indigenous Biodiversity (NPSIB) is needed to strengthen requirements for protecting our native plants, animals and ecosystems under the Resource Management Act 1991 (RMA)*

Yes

Q2 *The scope of the proposed NPSIB focuses on the terrestrial environment and the restoration and enhancement of wetlands. Do you think there is a role for the NPSIB within coastal marine and freshwater environments?*

Managing indigenous biodiversity in a strategic and joined up way is the real challenge.

No single organisation or agency has sole responsibility for managing indigenous biodiversity. Responsibility is split across many players who are given mandatory roles by one of many pieces of legislation.

It is important to ensure coherency between national direction and instruments, so that they do not confuse, distract or provide contrary direction to councils and landowners.

Spreading biodiversity requirements across the NPS, the NZ Coastal Policy Statement and NPS for Freshwater Management may hinder effective management of indigenous biodiversity – as it extends across terrestrial, freshwater and marine areas.

Q3 *Do you agree with the objectives of the proposed NPSIB?*

The Council agrees with the overall purpose of the proposed NPS – the maintenance of indigenous biodiversity, and how this is expressed in the objectives and policies. The Council recognises that biodiversity continues to be lost, areas and numbers are reducing to critical levels in many cases, and action is needed to halt, and ideally, reverse this decline. The objectives and policies also recognise that maintaining and enhancing biodiversity can effect communities and landowners in negative as well as positive ways. Objective 6 specifically recognises that people and communities need to still be able to provide for their social, economic and cultural wellbeing now and in the future.

Q4 *Hutia te Rito recognises that the health and wellbeing of nature is vital to our own health and wellbeing. This will be the underlying concept of the proposed NPSIB. Do you agree Yes / No? Why / why not?*

- Q5** *Does the proposed NPSIB provide enough information on Hutia te Rito and how it should be implemented? Yes / no. Is there anything else that should be added to reflect te ao Maori in managing Indigenous Biodiversity.*
- Q6** *Do you think the proposed NPSIB appropriately takes into account the principles of the Treaty of Waitangi? Yes / No? Why / why not?*
- Q7** *What opportunities and challenges do you see for the way in which councils would be required to work with tangata whenua when managing indigenous biodiversity? What information and resources would support the enhanced role of tangata whenua in indigenous biodiversity management? Please explain.*
- Q8** *Local authorities will need to consider opportunities for tangata whenua to exercise kaitiakitanga over indigenous biodiversity, including by allowing for suitable customary use of indigenous flora. Do you think the proposed NPSIB appropriately provides for customary use? Yes / no, please explain.*
- Q9** *What specific information, support or resources would help you implement the provisions in this section (section A)?*

The Council supports proposals for closer involvement of tangata whenua in maintaining and enhancing biodiversity. The main challenge it sees is that this is another matter that iwi are expected to become fully involved in, while many are already struggling with current expectations – in terms of their resources – in time as much as financial and other resources.

The Government needs to provide practical support to Iwi to enable them to participate to the extent envisaged.

- Q10** *Territorial authorities will need to identify, map and schedule Significant Natural Areas (SNAs) in partnership with tangata whenua, landowners and communities. What logistical issues do you see with mapping SNAs, and what has been limiting this mapping from happening?*
- Q11** *Of the following three options, who do you think should be responsible for identifying, mapping and scheduling of SNAs? Why?*
- a. Territorial authorities*
 - b. regional councils*
 - c. a collaborative exercise between territorial authorities and regional councils.*
- Q12** *Do you consider the ecological significance criteria in Appendix 1 of the proposed NPSIB appropriate for identifying SNAs? Yes/no? Why/why not?*

Q13 Do you agree with the principles and approaches territorial authorities must consider when identifying and mapping SNAs? (see Part 3.8(2) of the proposed NPSIB) Yes/no? Why/why not?

Q14 The NPSIB proposes SNAs are scheduled in a district plan. Which of the following council plans should include SNA schedules? Why?

d. regional policy statement

e. regional plan

f. district plan

g. a combination.

Q15 We have proposed a timeframe of five years for the identification and mapping of SNAs and six years for scheduling SNAs in a district plan. Is this reasonable? Yes/no? What do you think is a reasonable timeframe and why?

As part of the District Plan review the Council has already mapped and scheduled Significant Natural Areas (SNAs) in its District Plan. However, the identification of the SNAs was undertaken by the Waikato Regional Council.

The identification of SNAs should be the responsibility of Regional Councils. Regional Councils employ a range of technical specialists, generally have significantly more resources than territorial authorities, and identification on a region-wide basis would give a much more consistent result (notwithstanding the standard set of ecological criteria to be used).

The cost, particularly to smaller territorial authorities, of either employing in house staff, or engaging consultants, would be prohibitive.

For existing SNA schedules the Regional Council should also be responsible for classifying each one as "High" or "Medium". Again territorial authorities generally do not have in house expertise to do this, the cost of consultants would be onerous, Regional Council do have in house experts and all the background data.

The Council supports the scheduling and mapping of SNAs in the District Plan as this is a "landuse" matter and territorial authorities are responsible for landuse. It is most beneficial to Council, land owners, and users of the District Plan to have all land use provisions within the same document.

The Proposed NPS also provides that we have 3 years to have our currently scheduled and mapped SNAs assessed by a suitably qualified ecologist – to ensure they substantially confirm with the proposed criteria.

Again this should be undertaken on a region-wide basis – given that the Regional Council carried out the initial identification, using its criteria. It is therefore best placed to compare its criteria with the proposed ones.

Q16 Do you agree with the proposed approach to the identification and management of taonga species and ecosystems? (see Part 3.14 of the proposed NPSIB). Yes / No?

The Council supports proposals for closer involvement of tangata whenua in maintaining and enhancing biodiversity. The main challenge it sees is that this is another matter that iwi are expected to become fully involved in, while many are already struggling with current expectations – in terms of their resources – in time as much as financial and other resources.

The Government needs to provide practical support to Iwi to enable them to participate to the extent envisaged.

Q17 Part 3.15 of the proposed NPSIB requires regional councils and territorial authorities to work together to identify and manage highly mobile fauna outside of SNAs. Do you agree with this approach? Yes / No? Why / why not?

While it is recognised that section 6 already covers “significant habitats of indigenous fauna”, given that these are not necessarily within significant indigenous vegetation areas, it is, and will remain, one of the most difficult requirements to implement.

For example, long tailed bats forage on open farmland and often roost within forestry plantations. Migrating waders, such as oyster catchers etc require overland flyways.

Notwithstanding this, the Council agrees that the protection and enhancement of indigenous fauna is equally important as of indigenous flora.

Territorial Authorities do not have the expertise, information or capacity to undertake this role.

It therefore needs to be undertaken either by Regional Council’s – which do employ technical specialists such as ecologists or by the Department of Conservation (DoC). DoC already has the role of species conservation under the Wildlife Act.

Amendments may be needed to that Act however to achieve the intended outcomes.

Once locations have been identified, where this is possible, it is agreed such areas should be mapped or described in District Plans (for reasons set out above).

However, given their in house specialist staff, the onus of providing information to communities about highly mobile fauna and their habitats and best practise techniques for managing adverse effects on them, could be the responsibility of Regional Councils, or DoC.

Q18 What specific information, support or resources would help you implement the provisions in this section (section B) – Covered by questions 16 - 18

Identified Taonga

The specific information, support or resources required will depend on the extent of uptake of this opportunity by tangata whenua.

Collaborative processes such as this are very people hungry and, if Councils are to undertake the mapping this could also be a significant user of Council's resources. No timeframe is specified for this, so it could be ongoing over many years, though clause 3.3 appears to tie tangata whenua to Council's timeframes.

Should extra staff, or specialist consultants, be needed to undertake this aspect of the NPS, funding for this would be required.

As much as Council, if not more, tangata whenua will need to be resourced by central government to work with Councils to take up this opportunity.

If tangata whenua are not to be directly resourced by central government, Council's will need to be – so they can pass this on to tangata whenua.

Identifying and Mapping Significant Natural Areas

As set out above Council believes that this should be the role of Regional Councils. If left as the role of TAs Council would need funding to employ an ecologist to review its existing SNA schedule against the Appendix 1 criteria, and, assuming it is found to be substantially compliant, to rank each SNA as 'high' or 'medium'.

Should current schedule not be found to be substantially compliant funding will be required to undertake a whole of District assessment.

This would include funding for an ecologist and support people for the whole process – including consultation, administration and mapping.

All of the above would also be needed every 10 years – as part of the district plan update (review).

While the Regional Council undertook the initial SNA identification and mapping, the whole process around dealing with land owner feedback and subsequently submissions and appeals on the Proposed District Plan was very resource hungry – involving ecologists (consultant), Planners, Councillors, administrator etc – for what is only one aspect of an overall District Plan.

Surveying for and managing 'highly mobile fauna'

Is going to require significant resources – in the way of ecologist and other suitably qualified people to undertake inspections throughout the District. It is assumed that existing information will be very minimal, and to undertake this in a meaningful way will require inspections of all properties.

If to be undertaken at TA, or even Regional Council level, Central Government will need to fully fund this – or it will not happen (as has largely been the situation to date)

In addition, those organisations holding information on highly mobile fauna, and management techniques need to provide this, ideally free of charge, to territorial authorities.

Q19 Do you think the proposed NPSIB provides the appropriate level of protection of SNAs? Yes/no? Why/why not? (see Part 3.9 of the proposed NPSIB)

Q20 Do you agree with the use of the effects management hierarchy as proposed to address adverse effects on indigenous biodiversity instead of the outcomes-based approach recommended by the Biodiversity Collaborative Group? Yes/no? Why/why not?

Q21 Are there any other adverse effects that should be added to Part 1.7(4), to be considered within and outside SNAs? Please explain.

Q22 Do you agree with the distinction between high- and medium-value SNAs as the way to ensure SNAs are protected while providing for new activities? Yes/no/unclear? Please explain. If no, do you have an alternative suggestion?

Q23 Do you agree with the new activities the proposed NPSIB provides for and the parameters within which they are provided for? (see Part 3.9(2)-(4) of the proposed NPSIB) Yes/no? Why/why not?

Q24 Do you agree with the proposed definition for nationally significant infrastructure? Yes/no? Why/why not?

Q25 Do you agree with the proposed approach to managing significant indigenous biodiversity within plantations forests, including that the specific management responses are dealt with in the NESPF? (see Part 3.10 of the proposed NPSIB) Yes/no? Why/why not?

Q26 Do you agree with managing existing activities and land uses, including pastoral farming, proposed in Part 3.12 of the proposed NPSIB? Yes/no? Why/why not?

Council agrees that it is useful to apply a ranking to SNAs – not all will be of equal significance.

The Council supports the exemption of certain activities from the requirement to avoid adverse effects. Those listed should have minimal effect on overall indigenous biodiversity.

Also supported is the more lenient management approach for nationally significant infrastructure, mineral and aggregate extraction, customary activities on Maori land and use of Maori Land to make a significant contribution to enhancing social, cultural or economic wellbeing of tangata whenua, and 1 dwelling per title created before NPS comes into effect.

Clarification is needed of what clause 3.12 is to cover. The heading uses the word 'in' – "existing activities in SNAs".

Subclause 1 uses the work "on" -

".....applies to.....activities on SNAs"

Heading suggests clause relates to activities within the boundary of a mapped SNA. Sub-clause 1 suggests it relates also to activities outside of the boundary of a mapped SNA, but having an effect within the mapped SNA.

In addition, sub clause 4 is about areas of pasture that are not within the boundaries of mapped SNAs (ie are not SNAs).

Q27 Does the proposed NPSIB provide the appropriate level of protection for indigenous biodiversity outside SNAs with enough flexibility to allow other community outcomes to be met? Yes/no? Why/why not?

Successful on the ground implementation of rules applying outside of SNAs will require extensive education of landowners, who may otherwise proceed with activities on their land, being unaware of the rules.

Much indigenous vegetation is located well within or at the backs of farms – where it is not readily observed by Council staff or even neighbours.

Councils do not have the resources to monitor all such indigenous biodiversity.

Should monitoring be needed, central government funding will be necessary. See also overview.

Q28 Do you think it is appropriate to consider both biodiversity offsets and biodiversity compensation (instead of considering them sequentially) for managing adverse effects on indigenous biodiversity outside of SNAs? Yes/no? Why/why not?

Q29 Do you think the proposed NPSIB adequately provides for the development of Māori land? Yes/no? Why/why not?

Q30 Part 3.5 of the proposed NPSIB requires territorial authorities and regional councils to promote the resilience of indigenous biodiversity to climate change. Do you agree with this provision? Yes/no? Why/why not?

Q31 Do you think the inclusion of the precautionary approach in the proposed NPSIB is appropriate? (see Part 3.6 of the proposed NPSIB) Yes/no? Why/why not?

Q32 What is your preferred option for managing geothermal ecosystems? Please explain.

- a. Option 1**
- b. Option 2**
- c. Option 3**
- d. Or do your alternative option – please provide details**

Q33 We consider geothermal ecosystems to include geothermally influenced habitat, thermo-tolerant fauna (including microorganisms) and associated indigenous biodiversity. Do you agree? Yes/no? Why/why not?

Q34 Do you agree with the framework for biodiversity offsets set out in Appendix 3? Yes/no? Why/why not?

Q35 Do you agree with the framework for biodiversity compensation set out in Appendix 4? Yes/no? Why/why not? Include an explanation if you consider the limits on the use of biodiversity compensation set out in Environment Court Decision: Oceana Gold (New Zealand) Limited v Otago Regional Council as a better alternative.

Q36 What level of residual adverse effect do you think biodiversity offsets and biodiversity compensation should apply to?

- a. More than minor residual adverse effects**
- b. All residual adverse effects**
- c. Other. Please explain**

Q37 What specific information, support or resources would help you implement the provisions in this section (section C)?

The Council agrees that achievement of the overall purpose – halting biodiversity decline, will require controls over indigenous biodiversity outside of SNAs, and that controlling adverse effects of subdivision, landuse and development through the effects management hierarchy is appropriate. The provisions will be more flexible and there is no requirement to avoid key adverse effects.

Q38 The proposed NPSIB promotes the restoration and enhancement of three priority areas: degraded SNAs; areas that provide important connectivity or buffering functions; and wetlands. (see Part 3.16 of the proposed NPSIB) Do you agree with these priorities? Yes/no? Why/why not?

While the Council agrees that prioritisation can be beneficial the work required (by the territorial authorities) to identify the locations of "SNAs whose ecological integrity is

degraded” and “areas that provide important connectivity or buffering functions” would be significant. It would appear to require site inspections for all aspects above Regional Councils, with their specialist staff, would appear to be much better placed to carry out such assessments. For Councils with existing SNA schedules, which are found to be acceptable under clause 3.8, it would also require a lot of work to establish which fall into these 2 priority types.

Q39 Do you see any challenges in wetland protection and management being driven through the Government’s Action for healthy waterways package while wetland restoration occurs through the NPSIB? Please explain.

See comments in Overview.

Q40 Part 3.17 of the proposed NPSIB requires regional councils to establish a 10 per cent target for urban indigenous vegetation cover and separate indigenous vegetation targets for non-urban areas. Do you agree with this approach? Yes/no? Why/why not?

The Council agrees that increasing indigenous vegetation cover across the landscape, including in urban areas in parks and gullies, is essential to improve the long term future of indigenous biodiversity.

A realistic timeframe would need to be set for the achievement of the target percentage. The NPS should give guidance to Regional Councils on this. Also on a realistic target for rural areas.

Clarification is needed of what urban and rural areas are – in the sense of is the 10% target to apply to each village/town/city? A lower limit on the size of what is an “urban area” is needed. For example, is Patetonga consisting of around 20 small lots, an urban area – because some of those lots are zoned “Township” – identified in the District Plan as an “Urban Area”.

For rural areas – will this be calculated by the Region as a whole, each District as a whole, or by subsets of each District?

It is not clear where the costs of on the ground plantings are to fall – with Councils, or private landowners. In relation to urban areas in particular this would appear to require the purchase of land by TAs for the purpose of planting.

Particularly in lower growth Districts the opportunity to require developers to provide land, and plant it, will be limited.

Q41 Do you think regional biodiversity strategies should be required under the proposed NPSIB, or promoted under the New Zealand Biodiversity Strategy? Please explain.

Q42 Do you agree with the proposed principles for regional biodiversity strategies set out in Appendix 5 of the proposed NPSIB? Yes/no? Why/why not?

Q43 Do you think the proposed regional biodiversity strategy has a role in promoting other outcomes (eg, predator control or preventing the spread of pests and pathogens)? Please explain.

Q44 Do you agree with the timeframes for initiating and completing the development of a regional biodiversity strategy? (see Part 3.18 of the proposed NPSIB) Yes/no? Why/why not?

Q45 What specific information, support or resources would help you implement the provisions in this section (section D)?

A Regional Biodiversity Strategy would assist in achieving consistency across each region.

Q46 Do you agree with the requirement for regional councils to develop a monitoring plan for indigenous biodiversity in its region and each of its districts, including requirements for what this monitoring plan should contain? (see Part 3.20) Yes/no? Why/why not?

Q47 Part 4.1 requires the Ministry for the Environment to undertake an effectiveness review of the proposed NPSIB. Do you agree with the requirements of this effectiveness review? Yes/no? Why/why not?

The Council accepts that monitoring is required to ensure that the purposes of the NPS, and the various policies and rules and other plan provisions created under it, are being achieved.

The Council agrees with LGNZ that a monitoring system cannot be designed and implemented in isolated parts. Central government needs to design a coherent national system with standardised monitoring and reporting methods. This is to ensure compatibility of data gathering across the country – to allow a meaningful picture of progress to be obtained.

Central government funding will also be necessary to enable Councils to implement the monitoring programme.

Q48 Do you agree with the proposed additional information requirements within Assessments of Environment Effects (AEEs) for activities that impact indigenous biodiversity? (see Part 3.19 of the proposed NPSIB). Yes/no? Why/why not?

Q49 Which option for implementation of the proposed NPSIB do you prefer? Please explain.

a. Implementation as soon as reasonably practicable – SNAs identified and mapped in five years, scheduled and notified in plans in six years.

b. Progressive implementation programme – SNAs identified and mapped within seven years, scheduled and notified in plans in eight years.

Q50 Do you agree with the implementation timeframes in the proposed NPSIB, including the proposed requirement to refresh SNA schedules in plans every two years? Yes/no? Why/why not?

The Council does agree with the additional information applicants will be required to provide with their applications. Unless Councils receive adequate information it is not possible to properly assess proposals and their effects.

It is also agreed that the SNA schedules need to be reviewed regularly. To minimise the costs of this it would be useful to tie the frequency in with the re-flying of aerial photography, while recognising that this may be too infrequent to effectively deal with unauthorised removal of indigenous biodiversity.

If requirement is for site visits to be carried out every two years of all SNAs this would be extremely expensive for Councils, and not necessarily possible within the timeframe.

Central government funding would be required.

Q51 Which of the three options to identify and map SNAs on public conservation land do you prefer? Please explain.

- a. Territorial authorities identify and map all SNAs including public conservation land***
- b. Public conservation land deemed as SNAs***
- c. No SNAs identified on public conservation land***
- d. Other option.***

Q52 What do you think of the approach for identifying and mapping SNAs on other public land that is not public conservation land?

For consistency SNAs should be identified on public conservation land. All such land should be deemed to be SNA – except where aerial photos clearly show the land is in pasture or exotic forest.

In general, other public land does not involve such large areas as public conservation land. As set out above the Regional Council should be responsible for identifying and mapping SNAs, including on other public land.

Q53 Part 3.4 requires local authorities to manage indigenous biodiversity and the effects on it of subdivision, use and development, in an integrated way. Do you agree with this provision? Yes/no? Why/why not?

Q54 *If the proposed NPSIB is implemented, then two pieces of national direction – the NZCPS and NPSIB – would apply in the landward-coastal environment. Part 1.6 of the proposed NPSIB states if there is a conflict between these instruments the NZCPS prevails. Do you think the proposals in the NPSIB are clear enough for regional councils and territorial authorities to adequately identify and protect SNAs in the landward-coastal environment? Yes/no? Why/why not?*

Q55 *The indicative costs and benefits of the proposed NPSIB for landowners, tangata whenua, councils, stakeholders, and central government are set out in Section 32 Report and Cost Benefit Analysis. Do you think these costs and benefits are accurate? Please explain, and please provide examples of costs/benefits if these proposals will affect you or your work.*

Q56 *Do you think the proposed NPSIB should include a provision on use of transferable development rights? Yes/no? Why/why not?*

The Council does not support inter property transferrable development rights, but does support additional development rights on the property including an SNA. However this is a matter that should be left to individual Councils to determine – as part of their overall subdivision and development objectives and policies.

Q57 *What specific information, support or resources would help you implement the provisions in this section (section E)?*

Should Council's submission that a lot of the required work would be more appropriately carried out by the Regional Council not be accepted, it will certainly require support to implement this NPS. The required support would be the full range of Guidance Material, technical and scientific support and financial support.

Even already having SNAs scheduled, and mapped, the NPS would require a lot of work:

- Verification of current SNA schedule/mapping
- Ranking each SNA as medium or high
- Reviewing schedule every 2 years
- Prioritising SNAs for restoration and enhancement
- Achieving targets for increased indigenous vegetation cover
- Surveying and recording areas outside SNAs where highly mobile fauna have been, or likely to be, sometimes present (in conjunction with regional council).
- Making amendments to District Plan
- Assisting Regional Council with preparation of regional biodiversity strategy, and monitoring plan, and identifying Taonga.

Financial support would be essential given the indicative overall costs and size of Council's rating base, and other work required by other National directions.

The Council does not currently employ any staff with relevant technical or scientific expertise.

Q58 *What support in general would you require to implement the proposed NPSIB? Please detail.*

- a. Guidance material*
- c. Technical expertise*
- d. Scientific expertise*
- e. Financial support*
- f. All of above.*
- g. Other (please provide details)*
- h. All of the above*

Q59 *Do you think a planning standard is needed to support the consistent implementation of some proposals in the proposed NPSIB? Yes/no? If yes, what specific provisions do you consider are effectively delivered through a planning standard tool?*

Q60 *Do you think there are potential areas of tension or confusion between the proposed NPSIB and other national direction? Yes/no? Why/why not?*

Q61 *Do you think it is useful for RMA plans to address activities that exacerbate the spread of pests and diseases threatening biodiversity, in conjunction with appropriate national or regional pest plan rules under the Biosecurity Act 1993? Yes/no? Why/why not?*

Q62 *Do you have any other comments you wish to make?*

- Requirement to identify "former wetlands" and promote their restoration and enhancement.
 - o It is not clear which local authority is to do this
 - o It is not clear what minimum size this applies to
 - o In addition, and of most concern to Council, is the fact the whole of the Hauraki Plains (between 1/3rd and 1/2 of the Hauraki District, is former wetland)
- It is currently an area of highly producing pasture, used primarily for dairy farming.
- Central government promoted and implemented drainage schemes to achieve this result and these have been carried on by the Regional Council, and District Council.
- Significant sums of money have been and continue to be expended to achieve useable farmland
- There are also a number of towns and townships on this land.
- The Council could not support the reversion of the Hauraki Plains to Wetland.

- Requirement that "local authorities" undertake various aspects of the provisions
 - o This results in a lack of clarity on the specific responsibilities intended to be carried out by Regional and District Councils.

- Clearly defined boundaries around biodiversity rules and responsibilities will improve the overall effectiveness of the NPS and should result in greater confidence by Regional and District Council to take action.

○

14 March 2020.