13 March 2020

Indigenous Biodiversity Team
Ministry for the Environment
PO Box 10362
WELLINGTON 6143

Emailed to: indigenousbiodiversity@mfe.govt.nz

Dear Sir/Madam

Submission from the Manawatū District Council on He Kura Koiora i hokia – discussion document on the proposed NPS for Indigenous Biodiversity

Thank you for the opportunity to make a submission on the discussion document on a proposed National Policy Statement for Indigenous Biodiversity (NPSIB).

The Manawatū District Council submits in support of the submissions lodged by Local Government New Zealand (LGNZ) and the Manawatū-Whanganui Regional Council (“Horizons”). In addition to support for these other submissions, this submission outlines and reinforces the most significant concerns of Council Officers and Elected Members of the Manawatū District Council on behalf of our community.

The Manawatū District Council recognises the importance of protecting and restoring indigenous biodiversity.

As the Ministry is aware, the One Plan establishes Horizons as the lead agency in the region to control activities in specified habitats and to work with land owners to protect and enhance these habitats. Under the One Plan, the Manawatū District Council is responsible for notable and amenity trees, but not for indigenous biodiversity generally. The proposed NPSIB makes territorial authorities the lead agencies for a range of biodiversity planning work. The implementation of the NPS-IB will therefore require significant changes to both Horizons One Plan and the Manawatū District Council’s District Plan. The cost of undertaking these Plan Changes will not be justifiable in terms of benefits to biodiversity protection, and as suggested in the Horizons submission, may actually come at the expense of indigenous biodiversity outcomes in the Manawatū-Whanganui Region.

The Manawatū District Council is disappointed that the NPSIB does not provide sufficient flexibility to enable the established regulatory and non-regulatory framework for indigenous biodiversity management in Horizons One Plan to remain. The adaptive management approach to biodiversity management in the One Plan was tested through appeals on the One Plan to the Environment Court and was deemed to be “appropriate and lawful under the Resource Management Act.” We agree with the suggestion in Case Study 10 of the LGNZ submission that the ‘one size fits all’ approach in the NPSIB is a backwards step for the Horizons Region and cuts across the good work that Horizons has achieved, alongside landowners and occupiers, to date.
As stated in the submission from LGNZ, the responsibility to arrest the decline in biodiversity must be shared across the whole system, not just put on council's through a National Policy Statement for Indigenous Biodiversity. Central Government must play a more active role in indigenous biodiversity management.

**Cost of Implementation**

The implementation of the NPSIB will be difficult and costly for the Manawatū District Council. We have prepared estimates of additional staff requirements that will be required as a result of the NPSIB, if implemented as currently drafted. These costs have been estimated at $3,032,500 for the first five years and $360,000 per year for year 6 onwards. A copy of these calculations is attached as Annex A to this submission. This cost is equivalent to a rates increase of approximately 3% for years 1 to 5 and 1% on top of BAU for years 6 onwards.

The cost of implementing the NPSIB is unaffordable for ratepayers when considered in conjunction with the other national direction, including the National Policy Statements for Freshwater Management, Urban Development and Highly Productive Land, which also need to be implemented over the next five years.

The estimated resident population of the Manawatū District as at 30 June 2019 was 31,732. Of this resident population, 18.1% were aged 65+. The proportion of total residents aged 65+ in the District is forecast to increase to 27.5% of the total population (11,595 residents) by 2051. The ageing population means that a higher proportion of the District’s residents are likely to be on a fixed income, which means that rates affordability is an increasing concern.

There is no revenue source for councils in meeting these new responsibilities. The cost for implementation will have to be funded by rates.

**Timeframes are Unrealistic**

The implementation timeframes specified in the NPSIB will be unachievable for the Manawatū District Council. Our Council does not currently have the capability or capacity to implement the NPSIB which means that we must compete with other councils to recruit specialist staff or consultants to meet the requirements of the NPSIB. Unless the NPSIB is significantly amended to set implementation timeframes that are staged and priority-based, the Manawatū District Council will be unable to deliver on its statutory obligations.

In addition, the requirement to update the schedule of Significant Natural Areas every two years is not supported. While Council recognises the need to update the schedule on a regular basis, given the cost and resource demands of the plan change process, updates should be five yearly, not two yearly.

**Support required from Central Government**

Given the implementation costs involved and the current capacity and capability gaps, the Manawatū District Council requires the following support from central government for the implementation of this NPSIB:

1. Funding to cover the actual costs to council. We also request that Central Government provide funding to iwi/hapū and landowners.

2. Ecological expertise, including all necessary data and information on highly mobile fauna, from DOC or other central government agencies.
3. A national system of monitoring and reporting that councils must following for monitoring indigenous biodiversity.

4. Detailed guidance and a comprehensive implementation plan to map out how the draft NPSIB will be implemented by councils and how implementation support will be applied.

Mapping and Management of Significant Natural Areas

The Manawatū District Council does not have the capability or capacity to identify and manage biodiversity. This is particularly true when considering the plethora of national direction from Central Government that is intended to be implemented within the next five years. We agree with the LGNZ submission where it states that “The Government must prioritise with what needs to be done first and support all aspects of implementation.”

The mapping of sites within the timeframes outlined in the proposed NPSIB are unrealistic given the cost of undertaking the work and the availability of suitably qualified ecologists both within the Manawatū-Whanganui Region and nationally. Given the roles established through the One Plan our Council is particularly disadvantaged when it comes to readiness to respond to this NPSIB.

The Manawatū District Council supports the recommendation in the LGNZ submission that the proposed NPSIB should prioritise protection first and that the restoration policies be removed from the draft NPSIB. The NPSIB, as drafted, is too broad in its focus by trying to both protect and restore indigenous biodiversity.

The Manawatū District Council is concerned that the financial resource required with implementing the policies of the NPSIB may come at the expense of on-the-ground biodiversity protection, education and support of community projects in the Manawatū-Whanganui Region.

Resourcing for iwi and hapū

The more explicit role for Māori, iwi and hapū as key partners with councils in achieving biodiversity outcomes is supported. However, the Manawatū District Council is concerned about the level of resourcing required for iwi and hapū to manage the increased requirements placed on them through this NPSIB and question who will be responsible for meeting these costs.

Management of the Conservation Estate

The Manawatū District Council is of the opinion that local government should not have any role in the management of biodiversity, including the identification and mapping of Significant Natural Areas (SNAs) on the conservation estate. The Department of Conservation (DOC) administers this land and has established a number of roles within their Lower North Island team that specialise in local biodiversity – asset planners, biodiversity planners and planning managers that work in conjunction with their partnerships team. DOC already has the expertise and the responsibility to manage the conservation estate and are in a more advantageous position than local authorities to resource this task.

Of the three options identified in Table 7 on page 82 of the discussion document, Option 2 is Council’s preferred option, providing that the assessment and mapping of SNAs be the responsibility of the DOC, or another central government agency.
Highly Mobile Fauna

The Manawatū District Council does not support the requirement for councils to survey and protect highly mobile fauna. We agree with the view of LGNZ that this represents a significant shift in role from DOC, who are responsible for species conservation, to councils, who are responsible for habitat protection and maintenance. Councils do not have the capability or capacity to undertake this role. If the protection of highly mobile fauna is to be retained in the NPSIB, this role should be the responsibility of DOC or some other central government agency, or at a minimum, DOC should supply councils with all of the necessary information on the extent and vulnerability of highly mobile fauna within their jurisdiction so this information can be considered when assessing applications that could affect these.

Monitoring Indigenous Biodiversity

As recommended in the LGNZ submission, a coherent national system with standardised monitoring and reporting methods needs to be designed and implemented by central government, if local government is to effectively monitor indigenous biodiversity.

Thank you again for the opportunity to make a submission on the NPSIB.

The Manawatū District Council does not wish to be heard.

Please feel free to contact Council’s Chief Executive, Dr Richard Templer (Richard.Templer@mdc.govt.nz) or Council’s Senior Policy Adviser (Lisa.Thomas@mdc.govt.nz) if you have any questions or concerns about this submission.

Yours sincerely

Dr Richard Templer
Chief Executive

Helen Worboys
Mayor, JP

Enc
Annex A: Estimated costs for the Manawatū District Council to implement the NPSIB (as drafted)
## Additional Staff Requirements as a result of the NPS on Indigenous Biodiversity

<table>
<thead>
<tr>
<th>New Tasks to be performed in 5 years</th>
<th>Person Required</th>
<th>FTE/year</th>
<th>No. years</th>
<th>Contract/FTE</th>
<th>Salary est./FTE</th>
<th>Overhead</th>
<th>Total</th>
<th>Notes</th>
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<tbody>
<tr>
<td>Map all Significant Natural Areas (SNAs) in the District</td>
<td>Ecologist</td>
<td>2</td>
<td>3</td>
<td>$225,000</td>
<td></td>
<td></td>
<td></td>
<td>$1,350,000 Based on Horizons regions would take 100 Ecologist years to map</td>
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<tr>
<td>partnership with tangata whenua to map SNAs</td>
<td>Māori Advisor</td>
<td>0.5</td>
<td>5</td>
<td>$80,000</td>
<td>$80,000</td>
<td></td>
<td></td>
<td>$400,000 Given six Iwi we would have to work with and complexity</td>
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<tr>
<td>Classify SNAs in the district</td>
<td>Ecologist</td>
<td>0.5</td>
<td>3</td>
<td>$225,000</td>
<td></td>
<td></td>
<td></td>
<td>$337,500 The other half FTE of work to match the Horizons estimate</td>
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<tr>
<td>Work with tangata whenua to identify taonga species</td>
<td>Māori Advisor</td>
<td>0.5</td>
<td>5</td>
<td>$80,000</td>
<td>$80,000</td>
<td></td>
<td>$400,000 Extremely contentious subject</td>
<td></td>
</tr>
<tr>
<td>Identify presence of highly mobile indigenous fauna</td>
<td>Ecologist</td>
<td>0.5</td>
<td>2</td>
<td>$225,000</td>
<td></td>
<td></td>
<td></td>
<td>$225,000</td>
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<tr>
<td>Incorporate all of the above into GIS &amp; District Plans</td>
<td>Planner</td>
<td>1</td>
<td>2</td>
<td>$80,000</td>
<td>$80,000</td>
<td></td>
<td>$320,000 Probably only in this last two years, hence 2/5</td>
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<td></td>
<td></td>
<td><strong>$3,032,500</strong></td>
<td></td>
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<tr>
<td>On-going tasks in years 6+</td>
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<tr>
<td>Consider the impact on SNAs of every Resource Consent</td>
<td>Ecologist Planner</td>
<td>0.5</td>
<td></td>
<td>$100,000</td>
<td>$100,000</td>
<td></td>
<td>$100,000 Not sure we could find someone with duel skills!</td>
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<td>Update the SNAs every two years</td>
<td>Ecologist</td>
<td>0.5</td>
<td></td>
<td>$100,000</td>
<td>$100,000</td>
<td></td>
<td>$100,000</td>
<td></td>
</tr>
<tr>
<td>Work with tangata whenua on SNAs/taonga species</td>
<td>Māori Advisor</td>
<td>1</td>
<td></td>
<td>$80,000</td>
<td>$80,000</td>
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<td>$160,000</td>
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