

# Matamata-Piako District Council

Submission to the Draft National Policy Statement for  
Indigenous Biodiversity

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**Submission:**

This is a submission by the Matamata-Piako District Council on the Draft National Policy Statement for Indigenous Biodiversity and in particular addressing those issues raised in He Kura Koiora i hoki. The content of this submission follows overleaf.

Council appreciates the opportunity to provide comments on the document.

Signed:

A large, stylized handwritten signature in black ink, appearing to read "Don McLeod", is written over a horizontal line. The signature is enclosed within a large, loopy oval shape.

Don McLeod  
Matamata-Piako District Council

## **1. Introduction**

This submission is presented on behalf of the Matamata-Piako District Council being a District within the Waikato Region. The district is approximately 175,000 hectares and is bounded by the Kaimai Ranges to the east and is well known for its dairy farming heritage and thoroughbred racing industry.

The district encompasses many diverse environments ranging from the Kaimai-Mamaku Forest Park to the 10,200 ha Kopuatai Peat Dome, a globally unique wetland, and as at 1995 15% of the district was in indigenous vegetation.

The five leading employers in the district are manufacturing, agriculture, construction, retail trade, education and training.

The District has a total population of 34,404 with an urban population of approximately 58% within the towns of Matamata, Morrinsville and Te Aroha. Over the last census period Matamata increased in population by 24%, Morrinsville by 18% and Te Aroha by 21%. The remainder of the population (42%) is within the rural area.

Whilst Council is supportive of the National Policy Statement for Indigenous Biodiversity Council is concerned about the number of national directions that are currently in the pipeline to be implemented. That is causing significant pressure on all Council's resources; it is our view that the resources to implement all the new policies at the same time don't exist. Also it is putting pressure and overwhelming members of our communities including the farming sector. Central government needs to establish priorities.

## **2. Overview of the Proposed NPSIB**

Council is supportive of a National Policy Statement for Indigenous Biodiversity and commends the collaborative approach taken in drafting the NPSIB. This approach, in addition to the early engagement with Treaty partners and local authorities, gives Council a strong degree of confidence that the process has enabled the key issues and opportunities for biodiversity management to be identified.

Although there is a clear mandate under the Resource Management Act (RMA) within Part 2 of the Act to maintain biodiversity there is clear evidence that our indigenous biodiversity is declining at a national level, therefore national direction should provide an opportunity to maintain, restore and enhance what we have left.

Council supports the objectives however there is a lot of discussion throughout the Draft NPSIB about restoration and enhancement and whilst objective 5 identifies the need to enhance the ecological integrity of ecosystems, objective 1 should be 'to maintain and enhance' indigenous biodiversity. This will provide alignment with targets that get set for ecological districts, particularly where these have been depleted well below what should be in place to maintain an ecological area.

## **Section A: Recognising tea o Maori and the principles of the Treaty of Waitangi**

### **A.1 - Providing for the Concept of Hutia te Rito**

The underlying concept of Hutia te Rito is supported as it implies the health and wellbeing for all people in the community. It is accepted that if our indigenous biodiversity is healthy then this implies health and wellbeing for all the community.

Whilst there is enough information within the NPSIB on Hutia te Rito; further support through good guidance at a local level will be needed on this matter. This will be an added task to work through with Iwi/Maori through Councils Te Mana Whenua Forum. Whilst this is achievable there is concern that there is a lack of resources not only with Iwi but also Council / Regional Council staff resources to fully engage on this matter and Central Government support via the Department of Conservation would be helpful.

### **A.2- Providing for the principles of the Treaty of Waitangi and engaging with tangata whenua**

Council believes that the NPSIB takes into account the principles of the Treaty of Waitangi through the inclusiveness of tikanga Maori in decision-making and environmental management. This aligns with the existing provisions of the RMA.

Objective 6 recognises the role of landowners, communities and tangata whenua as stewards and kaitiaki of indigenous biodiversity and identifies how this is achieved. This includes allowing for people and communities to provide for their social, economic and cultural wellbeing, and supporting people and communities in their understanding of and connection to nature. It should be made clear here to allow for sustainable customary use of indigenous vegetation as this is clearly an outcome being sought.

The development of Regionally based cultural values by the Regional Council for the development of priorities for implementation of restoration and enhancement which would then be imposed through Regional Biodiversity Strategies and be used at the local level.

A national database on Indigenous Biodiversity through the likes of the Land Cover Database (LCDB), which can be used by all Councils throughout the country as a starting point. This will align local and regional databases and ensure that all parties are on the same wavelength.

It is essential that iwi and hapu are sufficiently resourced to participate effectively.

## **Section B: Identifying important biodiversity and taonga**

### **B.1- Identifying and mapping Significant Natural Areas (SNA)**

In 2006 Council undertook an exercise and identified 667 sites for assessment to identify whether or not they would be classified as SNA's. Working with an ecologist this resulted in 23% of the area being considered not significant. Of the total area surveyed, 78% was determined to be indigenous, 20% exotic and 2% not determined. Whilst most of these areas are not scheduled in the District Plan 'Unscheduled Significant Natural Features' within the District Plan are identified as requiring a resource consent application.

Council is concerned that it will have to redo this work based on the need to identify High and Medium classifications. It is hopeful that as the original work was undertaken by an expert (ecologist) that this would suffice in determining SNA's today without having to repeat surveying and ground truthing on every site. A collaborative approach to

determining SNA's is preferred, particularly for those Councils that have limited resources.

Council is supportive of the Management Framework which is identified in Appendix 1 of the Proposed NPSIB as this more or less aligns with its own criteria used in the District Plan. It is also supportive of the principles and approaches as these were used when it originally identified its SNA's. However as stated above further work will be required to determine what is High and what is Medium, and this work will be required to be undertaken following the principles and approaches for identifying SNA's. As Council has records of the original work it is suggested that Council has the opportunity to utilise this work for its further assessments and wants to ensure that it can utilise the original information gathered for this work as it was previously undertaken by appropriate experts.

SNA's should be scheduled in a combination of plans so the functions and responsibilities held by the different authorities are captured through the plan that is being administered.

## **B.2 – Recognizing and protecting taonga species**

Council is supportive of the approach taken to protect taonga; whereby it will be up to Iwi/Maori to identify whether or not they wish to have the protection put in place.

## **B.3 – Surveying for and managing 'highly mobile fauna'**

Council does not support the requirement for Regional and Local Authorities to work together and to survey for and protect highly mobile fauna. Councils do not have the expertise, information or capacity to undertake this role, and furthermore mobile fauna is not bound by district or regional boundaries. If more effort is needed to protect highly mobile fauna, it will be more effectively implemented by central government.

## **Section C: Managing Adverse Effects on biodiversity from activities**

### **C.2 - Providing for specific new activities within SNAs**

The proposal to identify high and medium value SNA's indicates that there is also a 'low' value SNA and that some sought of treatment should apply to those sites. As stated above Matamata-Piako District Council does provide for unscheduled SNAs in its plan where it provides some value. However as stated in B1 above, Council will want to utilise the existing information and ground truthing it has already undertaken, recognising that it will need a check to identify if any further areas need to be added.

### **C.3 – Managing significant biodiversity in plantation forests**

The proposed approach to managing significant indigenous biodiversity within plantation forests is supported by Council as where there is a significant habitat for threatened or at-risk indigenous fauna. Plantation forestry must be managed over the course of consecutive rotations to maintain long-term populations of indigenous species. Also, where there is at risk flora these must be managed. Council wants to ensure there is the alignment with the National Environmental Standards for Plantation Forestry.

### **C.4 - Providing for existing activities, including pastoral farming.**

Council supports that policy statements and plans recognise indigenous vegetation may regenerate in areas previously cleared for pastoral farming provided it hasn't become an SNA. This will allow for periodic clearance to maintain improved pasture as this has been carefully worked through by Federated Farmers and Forest and Bird.

### **C.5 - Managing adverse effects on biodiversity outside SNAs**

Council supports providing for protection of indigenous biodiversity outside of SNAs as it has already identified those areas that were not determined as being significant as 'Unscheduled Significant Natural Features' within the District Plan and are identified as requiring a discretionary resource consent application.

### **C.10 - Biodiversity offsetting and biodiversity compensation**

Council supports the framework for biodiversity offsets and biodiversity compensation for all residual adverse effects. This provides the opportunity to make up for what is not avoided, remedied or mitigated as part of land use development and subdivision. It provides an opportunity for a 'win win' situation. In saying that Council would need some clear guidelines as to how this would work for offsetting and compensation.

## **Section D: Restoration and enhancement of biodiversity**

### **D.1 - Restoration and enhancement of degraded Significant Natural Areas, connections, buffers and wetlands**

Council supports the promotion of the restoration and enhancement of the three priority areas: degraded SNAs; areas that provide important connectivity or buffering functions; and wetlands. The reasons are:

- a. the degraded SNAs would of already been identified as part of its work for the identification of SNA's in the District, however this could require significant resource to have these restored and enhanced
- b. Connectivity and buffering functions are needed to maintain the sustainability of SNA's for the long term. It is however identified that some form of prioritisation which includes community, ecological and cultural values is likely to be required to ensure restoration and enhancement occurs appropriately.

### **D.2 - Restoring indigenous vegetation cover in depleted areas**

Whilst Council supports the 10% for urban indigenous cover as it is known that this is the minimum percentage of an ecological district to maintain sustainability, it is of concern what is identified as 'urban'. Within Matamata-Piako District we have three towns of Matamata, Morrinsville and Te Aroha all being urban areas, and then the wider District. As part of the District a percentage greater than 10% is likely to be identified as we have approximately 15% now. Council clearly supports only one target for the District rather than trying to achieve 10% for each town and a target for the District.

### **D.3 - Regional biodiversity strategies**

Regional biodiversity strategies should be required under the NPSIB so that it can give effect to the National Biodiversity Strategy and so that it can be developed collaboratively with local councils, tangata whenua, communities and stakeholders. The matters identified in Appendix 5 should provide local councils with valuable information, direction and support for matters within districts.

## **Section E: Monitoring and implementation**

### **E.1 - Monitoring and assessment of indigenous biodiversity**

The monitoring plan should be developed by Regional Councils in conjunction with local councils as outlined in section 3.20. It is however recognised that with each Regional Council developing their own monitoring plan could lead to inconsistency throughout the country and that it will restrict the ability to be able to utilise data at a national level and fail to provide a complete picture across NZ. As identified by the Parliamentary Commissioner for the Environment's report, there is a clear need for central government leadership and support to design and implement a coherent national system with standardised monitoring and reporting methods. This should be in place prior to any Regional Plans for monitoring.

### **E.2 - Assessing environmental effects on indigenous biodiversity**

The proposed additional information requirements within Assessments of Environmental Effects (section 3.19) is supported. However there are inconsistencies as to how this is managed and inserted into plans. Subsections (1) and (2) must proceed through the statutory process and work through a plan change to incorporate into their plans which opens the process up for submissions, hearings, litigation, etc. Subsection (3) is to be inserted without the schedule 1 process within a one year timeframe. It is suggested that all of clause 3.19 be inserted into plans without a schedule 1 process.

### **E.3 - Timeframes and implementation approaches**

As Council has already been down the path of identifying its SNAs and provided that provisions are made to enable the utilisation of this information where the assessment criteria was expertly robust the timeframes shouldn't provide a concern. It is recognised that the short-term costs of implementation are necessary to realise long-term, intergenerational benefits to biodiversity.

To help Local Government prepare for climate change, central government should take the lead on providing high quality, consistent science and data, standard setting and decisions making guidance and legal frameworks. National direction is required to provide clarity for all, and ensure a robust and consistent approach. It makes little sense for Councils to be working individually on this – not only do they lack the resources and expertise but it would produce an ineffective patchwork approach.

Council is concerned about the number of national directions that are currently in the pipeline to be implemented. That is causing significant pressure on smaller Council's resources; we do not have the resources to implement all the new policies. Central government needs to establish priorities.

### **E.4 - SNAs on public land**

Council does not want to identify and map SNA's on public conservation land. Public conservation land should be deemed as SNA's or the Department of Conservation should identify these areas. Once this is completed by them these would need to be mapped by Councils. An SNA could also be identified on other public land and Council accepts that these can be identified and mapped. In saying this it is acknowledged that Council has already identified public conservation land which has a conservation zoning over it as scheduled SNAs.

## **E.7 - Guidance and support for implementing the proposed NPSIB**

Council will need Government to provide implementation support and guidance for the NPSIB work. Supporting measures, such as clear guidance, funding and incentives for restoration and enhancement, monitoring and reporting will be required. As identified throughout this submission support is sought through:

- Hutia te Rito good guidance
- Central Government support to work through matters with Iwi/hapu and ensuring Iwi/hapu are appropriately resourced
- That Central Government are provided with the role of identifying and mapping mobile fauna as local Councils don't have the expertise to deal with these matters.
- The development of clear guidelines for biodiversity offsetting and compensation
- The development of a national set of indicators so that national and regional monitoring will align
- Establishing appropriate timeframes given the number of national directions.