



RUAPEHU DISTRICT COUNCIL

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03 March 2020

To: Indigenous Biodiversity Team
Ministry for the Environment
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Email: indigenousbiodiversity@mfe.govt.nz

Subject: **RUAPEHU DISTRICT COUNCIL'S SUBMISSION ON THE DRAFT NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY**

Submission from: Ruapehu District Council
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Council does not wish to speak in support of its submission.

- 1.1 Ruapehu District Council (RDC) thanks the Ministry for the chance to submit on the draft National Policy Statement for Indigenous Biodiversity (NPS-IB) and the discussion document He Kura Koiora i Hokia.
- 1.2 RDC supports the protection of Aotearoa New Zealand's indigenous biodiversity and commends the government for taking actions to create a framework that is cohesive nationwide. However, RDC is concerned with some aspects of the NPS-IB, as outlined below and suggests that maybe a "one size fits all" approach is not appropriate in this instance.



2 SUPPORT FOR OTHER SUBMITTERS

- 2.1 RDC supports the submissions from Local Government New Zealand (LGNZ) and Horizons Regional Council (Manawatū-Whanganui Region).

3 HORIZONS REGION

- 3.1 In the Horizons Region there is an acknowledgement of the limited capability and capacity of Territorial Authorities to identify and manage biodiversity, particularly in the smaller councils that are resource constrained, but can have large areas of biodiversity within their district, such as the Ruapehu District. RDC will have limited ability to effectively classify and manage biodiversity if the NPS-IB is implemented as currently drafted.
- 3.2 Under the Horizons Regional Council's One Plan, Local Authorities in the Manawatū-Whanganui Region are responsible for notable and amenity trees, but not indigenous biodiversity generally. The implementation of the NPS-IB will therefore require significant changes to both the One Plan and Ruapehu District Council's District Plan.
- 3.3 The Policy recognises that both the regional council and local councils have responsibility to give effect to Part 2 of the RMA. This requires that the protection of significant indigenous vegetation and significant habitats of indigenous fauna are recognised and provided for as a matter of national importance. This results in Local Authorities retaining the ability to consider the impacts of activities that Horizons has no role in, such as subdivision, on indigenous biodiversity in their district plans.
- 3.4 The proposed NPS-IB will be a step in the wrong direction for the Horizons Region and will affect the work that Horizons has already achieved with key land stakeholders in this area.
- 3.5 RDC would like to see flexibility in the NPS-IB to keep in place the already established regulatory and non-regulatory framework for indigenous biodiversity management in the Horizons One Plan.

4 COST OF THE POSPOSED NPS-IB

- 4.1 Central Government is currently imposing a number of costly changes and delegating responsibilities to local authorities without funding mechanisms attached. For Local Authorities with small ratepayer bases, these costings are simply unaffordable. With no revenue resources attached, the burden for implementation falls on Local authorities' ratepayers. For councils such as RDC whose ratepayer base is predominantly from the rural sector, this will be an extra burden on them. Furthermore, the median income in the district is currently 16% below the national. These additional costs will ultimately cause rent increases and will exacerbate the housing un-affordability already affecting the district.

5 CENTRAL GOVERNMENT SUPPORT

- 5.1 If the NPS-IB is to be implemented as currently proposed, Central Government will need to provide resourcing support in the form of ecological expertise as well as direct funding to local authorities and land stakeholders (both iwi / hapū and land owners). There also needs to be more detailed guidance for both the implementation process and monitoring system.

6 SUPPORT FOR IWI AND HAPŪ

- 6.1 Council supports the role of iwi and hapū as key partners in achieving biodiversity. For this to be successful, iwi and hapū need to be well resourced and supported to be able to fulfil the



requirements suggested in the NPS-IB. Central Government will need to resource iwi and hapū to allow them to be successful in their role as kaitiaki.

7 MAPPING AND MANAGEMENT OF SIGNIFICANT NATURAL AREAS (SNA)

- 7.1 RDC will not have the ability to successfully identify and manage biodiversity without significantly impacting our ratepayers. The expectation to have this implemented into Council process within five years (along with other Central Government national directions) is not realistically viable. Central Government should prioritise what is important and implement accordingly or resource councils, not only financially but also with expertise.
- 7.2 Currently the drafted NPS-IB is too broad in scope by trying to protect and restore indigenous biodiversity. RDC supports LGNZ's view that the NPS-IB should prioritise protection first, and that restoration be removed from the NPS-IB. Implementation of the NPS-IB should not come at the expense of current community projects that are already in place for the protection of bio diversity.
- 7.3 The mapping of SNAs within the suggested timeframes, and having that work verified by a qualified ecologist within RDC and nationally unrealistic, given the shortage of the skills required for such a task. The role established through Horizons One Plan disadvantages RDC further in terms of responsiveness to the implementation of the NPS-IB.

8 CONSERVATION AREAS

- 8.1 As the administrators of the National Parks in the Ruapehu District, the Department of Conservation (DOC) has the expertise and the responsibility to manage these conservation areas and are in a more advantageous position than Local Authorities to resource this task.
- 8.2 As a Local Authority with two of the major National Parks in Aotearoa New Zealand, RDC relies on the partnership with DOC to effectively manage these significant conservation areas.
- 8.3 Providing that the assessment and mapping of SNAs be the responsibility of the DOC, or another Central Government agency, page 82 of the discussion document, table 7, Option 2 is Council's preferred option.

9 HIGHLY MOBILE FAUNA

- 9.1 RDC believes councils do not have the ability to undertake the responsibility to survey and protect highly mobile fauna and therefore do not support the proposal in the NPS-IB to do so.
- 9.2 RDC supports LGNZ's view that this represents a significant shift in role from DOC, who are responsible for species conservation, to councils, who are currently responsible for habitat protection and maintenance. This role should be the responsibility of DOC. If the role is delegated elsewhere, DOC should supply all 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.

10 MONITORING INDIGENOUS BIODIVERSITY

- 10.1 A coherent national system with standardised monitoring and reporting methods needs to be designed and implemented by Central Government as recommended in the LGNZ submission.



11 TIMEFRAMES ARE UNREALISTIC

- 11.1 The implementation timeframes specified in the NPS-IB are unachievable for RDC. RDC does not have the capability or capacity to implement the NPS-IB. We will have to compete with other councils to recruit specialist staff or consultants to meet the requirements of the NPS-IB. The NPS-IB must be amended to set implementation timeframes that are staged and priority-based.
- 11.2 RDC 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 less frequent than two yearly. RDC suggests a review period of five years.

12 CONCLUSION

- 12.1 The responsibility to maintain the indigenous biodiversity of Aotearoa New Zealand should not solely be inflicted and delegated to Local Authorities. Central Government will need to get their hands dirty in the management of biodiversity and not delegate the authority elsewhere. At a minimum, support in terms of financial resourcing and expertise should be offered to local authorities.

