

## APPENDIX 3: ASSESSMENT OF GIVING EFFECT TO THE NPS-IB THROUGH THE ECOSYSTEMS AND INDIGENOUS BIODIVERSITY CHAPTER

### Statutory context

- The NPS-IB must be given effect to “as soon as reasonably practicable”<sup>1</sup> although the Resource Management (Freshwater and Other Matters) Amendment Bill proposes to disapply that requirement for a 3-year period which commences with the Amendment Act.
- Part 3 of the NPS-IB sets out a “non-exhaustive lists of things that must be done to give effect to” the NPS-IB. Many of these NPS-IB provisions are highly directive and generally leave little flexibility to choose how they are implemented.
- The scope of the Far North Proposed District Plan (PDP) includes an indigenous biodiversity chapter and there are numerous submission points seeking alignment of the PDP with the NPS-IB.

### Key principles guiding the approach to give effect to the NPS-IB through the PDP

- Significant amendments to the notified Ecosystem and Indigenous Biodiversity chapter (**the IB Chapter**) to give effect to the NPS-IB are not recommended because a future plan change would provide a fairer opportunity for interested persons to comment and participate in the process.
- The PDP cannot give effect to any of the NPS-IB provisions relating to Significant Natural Areas (SNAs) as these areas need to be mapped in district plans (by definition) before the SNA provisions in the NPS-IB apply. It is therefore recommended that all provisions relating to SNAs in the NPS-IB are given effect to through a future plan change process.
- It is not practicable to give effect to NPS-IB provisions that require further engagement and partnership with tangata whenua and landowners through the PDP and these need to be given effect to through a future plan change process.
- It is not practicable to give effect to NPS-IB provisions that require further technical/ecological work (e.g. identifying highly mobile fauna areas) through the NPS-IB and these need to be given effect to through a future plan change process.

NPS-IB Objective/Policy	NPS-IB Part 3 — Implementation Clause	Relevant provisions in Ecosystem and Indigenous Biodiversity chapter (as notified)	Recommendations to give effect to NPS-IB provision through PDP or future plan change process
<p>(1) The objective of this National Policy Statement is:</p> <p>(a) to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and</p> <p>(b) to achieve this:</p> <p>(i) through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and</p> <p>(ii) by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and</p> <p>(iii) by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and</p>	<p>N/A – the NPS-IB objective has no specific Part 3 implementation clause as all policies and implementation clauses of the NPS-IB give effect to the objective.</p>	<p>Objectives IB-O1, IB-O2, IB-O3, IB-O4, IB-O5 are strongly aligned with the NPS-IB objective, which includes a number of related elements. In particular:</p> <ul style="list-style-type: none"> <li>• IB-O1 seeks to protect significant indigenous vegetation and significant habitats of indigenous fauna.</li> <li>• IB-O2 seeks to maintain and restore indigenous biodiversity while providing for the social, economic, and cultural wellbeing of people and communities.</li> <li>• IB-O3 recognises and provides for the relationship between tangata whenua and indigenous biodiversity.</li> <li>• IB-O4 seeks to recognise and provide for the role of tangata whenua as kaitiaki and landowners as stewards in protecting and restoring significant biodiversity and indigenous biodiversity.</li> <li>• IB-O5 promotes the restoration and enhancement of indigenous biodiversity.</li> </ul>	<p>Overall, I consider that objectives in the IB Chapter are strongly aligned with the NPS-IB objective.</p> <p><b>Recommendation:</b> Retain IB-O1 to IB-O5 (subject to amendments recommended in section 42A report in response to specific submissions points) which collectively give effect to the NPS-IB objective.</p>

<sup>1</sup> Clause 4.1(1) of the NPS-IB states that “Every local authority must give effect to this National Policy Statement as soon as reasonably practicable”. This is slightly different from the general requirement in section 55(2D) for local authorities to give effect to national policy statements as “soon as practicable”.

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<i>(iv) while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.</i>			
<b>Policy 1:</b> <i>Indigenous biodiversity is managed in a way that gives effect to the decision-making principles and takes into account the principles of the Treaty of Waitangi.</i>	<b>Clause 3.2:</b> Role of decision-making principles	The IB Chapter does not include any “ <i>decision-making principles</i> ” as defined in Clause 1.5 of the NPS-IB. However, there are numerous provisions that relate to the principles of the Treaty of Waitangi, which have been taken into account when preparing the IB Chapter. Of particular relevance are IB-O3, IB-O4, IB-P5, IB-P6, IB-P10 and IB-R2. There are also numerous other provisions relating to the principles of the Treaty of Waitangi in the PDP, including in the Tangata Whenua, Treaty Settlement Overlay and Māori Purpose Zone chapters.	I consider that the IB Chapter is broadly consistent with Policy 1 of the NPS-IB with the exception of the decision-making principles. Clause 3.2 of the NPS-IB directs that local authorities give effect to the “ <i>decision-making principles</i> ” when implementing the NPS-IB in their regions and districts. This is a procedural requirement which cannot practicably be given effect to through the PDP. Therefore, I recommend that the NPS-IB “ <i>decision-making principles</i> ” are given effect to through the future plan change to give effect to the NPS-IB in full.  <b>Recommendation:</b> Policy 1 and Clause 3.2 in the NPS-IB are given effect to through a future plan change which implements the NPS-IB in full.
<b>Policy 2:</b> <i>Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe.</i>	<b>Clause 3.3:</b> Tangata whenua as partners	IB-O seeks to recognise and provide for the relationship between tangata whenua and indigenous biodiversity, including taonga species and habitats and IB-O4 seeks to recognise and provide for the role of tangata whenua as kaitiaki.	Clause 3.3 sets out detailed direction to involve tangata whenua as partners in all aspects of managing indigenous biodiversity, including when developing plan provisions to give effect to the NPS-IB. Clause 3.3 also include specific direction relating to early and meaningful engagement with tangata whenua, providing opportunities for tangata whenua to exercise kaitiakitanga, investigate joint management arrangements etc. This is a procedural requirement and it is not practicable or appropriate to give effect to Clause 3.3 in full through the PDP, as this requires a partnership approach and consideration of broader arrangements that sit outside the PDP. However, it is practicable and appropriate to give effect to the direction relating to the role of tangata whenua as kaitiaki and this will also address a gap in the notified policy.  <b>Recommendation:</b> Include a new policy in the IB Chapter to partly give effect to Clause 3.3(2) in the NPS-IB and give effect to Policy 2 and Clause 3.3 in full through a future plan change to implement the NPS-IB. My recommended new policy is:  <u>Ensure that the protection, maintenance and restoration of indigenous biodiversity is done in a way that:</u> a. <u>recognises and values the mana of tangata whenua as kaitiaki; and</u> b. <u>provides specific opportunities for tangata whenua to exercise kaitiakitanga in accordance with tikanga Māori.</u>
	<b>Clause 3.18:</b> Māori lands	IB-P6 and IB-R2 in the IB Chapter relate to the use and development of Māori lands. There are also specific provisions relating to the use and development of Māori land in the Treaty Settlement Overlay and Māori Purpose Zone chapters of the PDP.	Clause 3.19 requires local authorities to work in partnership with tangata whenua and owners of “ <i>specified Māori land</i> ” to develop provisions that, to the extent practicable: (a) maintain and restore indigenous biodiversity on specified Māori land; and (b) protect SNAs and identified taonga on specified Māori land. This partnership approach is a procedural requirement that will take time to develop and is best done in tandem with the process to identify SNAs based on the principles of partnership and transparency. Therefore, it is not practicable or appropriate to give effect to Clause 3.19 in the NPS-IB through the PDP.  <b>Recommendation:</b> Clause 3.18 in the NPS-IB is given effect to through a future plan change that gives effect to the NPS-IB in full. This will allow a partnership approach with tangata whenua to be implemented as directed by the NPS-IB.
	<b>Clause 3.19:</b> Identified taonga	IB-O3 in the IB Chapter provides high level direction to recognise the relationship between tangata whenua and “ <i>taonga species and habitats</i> ” but there are no specific provisions relating to the identification of taonga species.	Clause 3.19 prescribes a specific process for territorial authorities to work in partnership with tangata whenua to identify taonga species, populations and ecosystems. This is a process that will take time to develop and requires partnership with tangata whenua. Therefore, it is not practicable or appropriate to give effect to Clause 3.19 through the PDP.

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			<p><b>Recommendation:</b> Clause 3.19 in the NPS-IB is given effect to through a future plan change process to give effect to the NPS-IB in full. This will allow a partnership approach with tangata whenua to be implemented as directed by the NPS-IB.</p>
<p><b>Policy 3:</b> A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.</p>	<p><b>Clause 3.7:</b> Precautionary approach</p>	<p>N/A – there are not specific provisions in the IB Chapter relating to a precautionary approach.</p>	<p>Clause 3.7 does not specifically require local authorities to make changes to plans – the direction is simply to adopt a precautionary approach when there is uncertainty about the effects on indigenous biodiversity, but these effects could potentially be significant. In my view, it is practicable for the PDP to give effect to this direction through a specific amendment to IB-P10 so that the precautionary approach is a matter to consider when assessing resource consent applications.</p> <p><b>Recommendation:</b> I recommend that Policy 3 and Clause 3.7 are given effect to through a new clause in IB-P10 as follows:</p> <p><i><u>“adopting a precautionary approach where the effects on indigenous biodiversity are uncertain, unknown, or little understood and those effects could cause significant or irreversible damage to indigenous biodiversity”</u></i>.</p>
<p><b>Policy 4:</b> Indigenous biodiversity is managed to promote resilience to the effects of climate change.</p>	<p><b>Clause 3.6:</b> Resilience to climate change</p>	<p>N/A – the IB Chapter does not include any provisions specific to promoting the residence of indigenous biodiversity to climate change.</p>	<p>Clause 3.6 does not specifically require local authorities to make changes to plans – the direction sets out actions local authorities should take to promote resilience of indigenous biodiversity to climate change and recognise the role of indigenous biodiversity in mitigating climate change. The direction in Policy 4 and Clause 3.6 is relatively specific and I consider that it is practicable for the PDP to give effect to this direction without causing any natural justice issues. There are submissions requesting the IB Chapter provide greater recognition of ecosystems services, including improving resilience to climate change, which I consider provide the necessary scope for my recommended changes.</p> <p><b>Recommendation:</b> The IB Chapter is amended to give effect to Policy 4 and Clause 3.6 through a new clause in IB-P10 as follows:</p> <p><i><u>“promoting the resilience of indigenous biodiversity to climate change and recognising the role of indigenous biodiversity in mitigating the effects of climate change.”</u></i></p>
<p><b>Policy 5:</b> Indigenous biodiversity is managed in an integrated way, within and across administrative boundaries.</p>	<p><b>Clause 3.4:</b> Integrated approach</p>	<p>There are no provisions in the IB Chapter that relate specifically to the integrated management of indigenous biodiversity. However, the PDP takes an integrated management approach to the use, development or protection of land and associated natural and physical resources. This is reflected in the General Approach section in the PDP, which states that <i>“integrated resource management requires coordination and cooperation between authorities for management issues that extend across boundaries and across jurisdictions.”</i></p>	<p>Clause 3.4 in the NPS-IB does not require local authorities to make changes to policy statements and plans to give effect to the provision – rather the direction is to manage indigenous biodiversity in an integrated way by setting out what this means in practice (e.g. recognising the interconnectedness of the whole environment and interactions between the terrestrial environment, freshwater and the coastal marine areas).</p> <p>The specific direction in Clause 3.4 is also more focused on how local authorities achieve integrated management across different environments and administrative boundaries rather than the development of specific plan provisions. On this basis, I do not consider that the PDP needs to include specific provisions to give effect to Policy 5 and Clause 3.4 at this point.</p> <p><b>Recommendation:</b> No amendments to the IB Chapter, but consider whether specific direction relating to integrated management of indigenous biodiversity is required as part of the future plan change to implement the NPS-IB in full.</p>
<p><b>Policy 6:</b> Significant indigenous vegetation and significant habitats of indigenous fauna are identified as significant natural areas (SNAs) using a consistent approach.</p>	<p><b>Clause 3.8:</b> Assessing areas that qualify as significant natural areas</p> <p><b>Clause 3.9:</b> Identifying SNAs in district plans</p>	<p>The IB Chapter includes provisions relating to identification of SNAs, but these are not aligned with the detailed NPS-IB requirements for SNA mapping (discussed in detail in Key Issue 2 in the section 42A report).</p>	<p>The NPS-IB provisions relating to SNA mapping are detailed and directive. Giving effect to these provisions will require a robust approach to district-wide SNA mapping that follows a transparent, accurate (physical inspection where practicable) and collaborative process (engagement with landowners and tangata whenua). It is not practicable or appropriate to give effect to these requirements through the PDP for the reasons outlined in the section 42A report.</p> <p><b>Recommendation:</b> The IB Chapter is amended to remove references to identifying SNAs (discussed in detail in Key Issue 2 in the section 42A report) and the NPS-IB provisions relating to SNA mapping are given effect to through a future plan change process that implements the NPS-IB in full.</p>

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<b>Policy 7:</b> SNAs are protected by avoiding and managing adverse effects from new subdivision, use and development.	<b>Clause 3.10:</b> Managing adverse effects on SNAs of new subdivision, use, and development  <b>Clause 3.11:</b> Exceptions to clause 3.10(2)	The IB Chapter includes provisions relating to the protection of SNAs, but these are not aligned with the detailed requirements in Clause 3.10 to avoid certain adverse effects on SNAs and the exceptions for certain activities (e.g. specified infrastructure) in Clause 3.11.	It is not appropriate or practicable for the PDP to give effect to NPS-IB requirements relating to the protection of SNAs. This is because these provisions are premised on SNAs first being identified in district plans (based on the NPS-IB definition of SNAs). Further, my understanding is that the NPS-IB provisions relating to SNA mapping and subsequent protection of those areas in Part 3, sub-part 2 of the NPS-IB are intended to be implemented together (for a range of reasons). Accordingly, these provisions must be given effect to through a future plan change process.  <b>Recommendation:</b> Delete references to SNA from the IB Chapter and give effect to the NPS-IB provisions relating to the protection of SNAs through a future plan change that implements the NPS-IB in full.
<b>Policy 8:</b> The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.	<b>Clause 3.16:</b> Indigenous biodiversity outside SNAs	IB-O2, IB-P2, IB-P3, IB-P4 and IB-P5 include direction relevant to maintaining indigenous biodiversity outside SNAs and managing adverse effects on non-significant indigenous biodiversity. However, this direction is not aligned with Clause 3.16 which sets out specific requirements to apply the “ <i>effects management hierarchy</i> ” (defined in the NPS-IB) to significant adverse effects outside SNAs and manage other adverse effects to give effect to the NPS-IB objective and policies.	The direction in Policy 8 and Clause 3.16 applies “outside SNAs”. It could therefore be argued that it should apply throughout the Far North District as the PDP does not include any SNAs (as defined in the NPS-IB). However, this would create a tension with NZCPS Policy 11 and Policy 4.4.1 in the RPS which direct where certain adverse effects need to be avoided and where significant adverse effects need to be avoided. I consider this issue in detail in Key Issue 8 of the section 42A report (IB-P2, IB-P3 and IB-P4) and recommend the following amendments to reconcile this higher order direction: <ul style="list-style-type: none"><li>• IB-P2 and P3 are amended to better align with Policy 4.4.1 in the RPS (which already gives effect to the NZCPS) including specific direction on when adverse effects or significant adverse effects must be avoided.</li><li>• IB-P4 is amended to apply to other “<i>significant adverse effects</i>” and require these to be managed in accordance with the “<i>effects management hierarchy</i>” to give effect to Clause 3.16(1) in the NPS-IB.</li></ul> <b>Recommendation:</b> IB-P4 is amended to give effect to the direction in Clause 3.16(1) in the NPS-IB.
<b>Policy 9:</b> Certain established activities are provided for within and outside SNAs.	<b>Clause 3.15:</b> Managing adverse effects of established activities affecting SNAs  <b>Clause 3.17:</b> Maintenance of improved pasture	IB-P5 in the IB Chapter provides direction relating to existing activities, primary production and the protection of SNAs. IB-R1 also enables indigenous vegetation clearance associated with certain existing activities.	For the same reasons as outlined above, it is not appropriate or practicable in my view for the PDP to give effect to NPS-IB requirements relating to the protection of the ecological integrity and extent of SNAs from existing activities and the maintenance of improved pasture for farming where this may affect a SNA. This is because the SNAs effects management provisions in the NPS-IB are premised on SNAs first being identified in district plans. This will require a separate plan change process where the NPS-IB provisions relating to SNA mapping and protection of those areas can be implemented together.  <b>Recommendation:</b> The NPS-IB provisions relating to the protection of SNAs from existing activities and improved pasture for farming are given effect to through a future plan change process that implements the NPS-IB in full.
<b>Policy 10:</b> Activities that contribute to New Zealand’s social, economic, cultural, and environmental wellbeing are recognised and provided for as set out in this National Policy Statement.	<b>Clause 3.5:</b> Social, economic, and cultural wellbeing	There are numerous provisions in the IB Chapter that relate to social, economic and cultural well-being, including IB-O2, IB-P5, IB-P10, and the permitted vegetation clearance associated with different activities under IB-R1.	I consider that IB Chapter is broadly aligned with these NPS-IB provisions, in particular IB-O2, IB-O3, IB-O4 and IB-P5. However, I also consider that there is an opportunity to better give effect to Policy 10 and Clause 3.5 through a discrete amendment to IB-P10 in the IB Chapter. I consider that it is practicable to make this amendment through the PDP and there is scope to do so through submissions.  <b>Recommendation:</b> Policy IB-10 is amended to give effect to Policy 10 and Clause 3.5 in the NPS-IB through a new clause as follows:  <i>“the extent to which the proposed activity provides for the social, economic and cultural wellbeing of people and communities”.</i>
<b>Policy 11:</b> Geothermal SNAs are protected at a level that reflects their vulnerability, or in accordance with any pre-existing underlying geothermal system classification.	<b>Clause 3.13:</b> Geothermal SNAs	N/A – there are no provisions relating to geothermal SNAs in the IB Chapter.	The Far North District contains some geothermal systems, but further technical work is required to determine whether these are geothermal SNAs (as defined in the NPS-IB). Clause 3.13 then sets out specific requirements to work in partnership with tangata whenua to develop provisions to manage geothermal SNAs that provides a level of protection that reflects the vulnerability of the geothermal SNAs. It is not appropriate or practicable to give effect to these requirements through the PDP process as further technical work and partnership with tangata whenua is required.

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			<p><b>Recommendation:</b> The NPS-IB provisions relating to geothermal SNAs are given effect to through a future plan change process to implement the NPS-IB in full.</p>
<p><b>Policy 12:</b> <i>Indigenous biodiversity is managed within plantation forestry while providing for plantation forestry activities.</i></p>	<p><b>Clause 3.14:</b> Plantation forests activities</p>	<p>IB-P5 in the IB Chapter provides direction to not impose unreasonable restrictions on primary production activities. IB-R5 provides for plantation forestry and plantation forestry activities as a discretionary activity within a SNA.</p>	<p>For the reasons outlined above, it is not appropriate or practicable for the PDP to give effect to NPS-IB requirements relating to managing the adverse effects of plantation forestry activities on SNAs. This is because these provisions in the NPS-IB are premised on SNAs first being identified in district plans, which requires a future plan change process.</p> <p><b>Recommendation:</b> Policy 12 and Clause 3.14 in the NPS-IB relating to the adverse effects of plantation forestry activities on SNAs are given effect to through a future plan change that implements the NPS-IB in full.</p>
<p><b>Policy 13:</b> <i>Restoration of indigenous biodiversity is promoted and provided for.</i></p>	<p><b>Clause 3.21:</b> Restoration</p>	<p>IB-O5 and IB-P6 in the IB Chapter promote and encourage restoration of SNAs and indigenous biodiversity.</p>	<p>The IB Chapter is broadly aligned with the provisions in the NPS-IB relating to the restoration of indigenous biodiversity. However, the IB Chapter does not identify priorities for restoration, as outlined in Clause 3.21 (2), which district plans are required to give effect to. I consider that it is practicable and appropriate to give effect to the priorities for restoration in Clause 3.21 through a new policy in the IB Chapter and that there is scope to do so through submissions.</p> <p><b>Recommendation:</b> Policy 13 and Clause 3.21 in the NPS-IB are given effect to through a new policy as follows:</p> <p><i>“Promote the restoration of indigenous biodiversity, with priority given to:</i></p> <ul style="list-style-type: none"> <li>a) <i>areas of significant indigenous vegetation and significant habitat of indigenous fauna whose ecological integrity is degraded;</i></li> <li>b) <i>threatened and rare ecosystems representative of naturally occurring and formerly present ecosystems;</i></li> <li>c) <i>areas that provide important connectivity or buffering functions;</i></li> <li>d) <i>natural inland wetlands where ecological integrity is degraded or these no longer retain their indigenous vegetation or habitat for indigenous fauna;</i></li> <li>e) <i>areas of indigenous biodiversity on specified Māori land where restoration is advanced by the Māori landowners; and</i></li> <li>f) <i>any other priorities specified in regional biodiversity strategies or any national priorities for indigenous biodiversity restoration.”</i> </li></ul>
<p><b>Policy 14:</b> <i>Increased indigenous vegetation cover is promoted in both urban and non-urban environments.</i></p>	<p><b>Clause 3.22:</b> Increasing indigenous vegetation cover</p>	<p>N/A - the IB Chapter includes does not include specific provisions relating to increasing indigenous vegetation cover in urban and non-urban environments.</p>	<p>Clause 3.22 requires further technical work by NRC to assess indigenous vegetation cover in urban and non-urban environments in the region. Once this exercise is complete, NRC needs to set targets for increasing indigenous vegetation cover in collaboration with territorial authorities and tangata whenua. District plans must then be amended to promote the increase of indigenous vegetation cover having regard to those targets. It is therefore not practicable or appropriate to give effect to Policy 14 and Clause 3.22 in the NPS-IB until the regional council has undertaken these technical assessments and engagement otherwise this would result in inconsistencies and potential rework.</p> <p><b>Recommendation:</b> Policy 14 and Clause 3.22 in the NPS-IB are given effect to through a future district plan change which implements the NPS-IB in full.</p>
<p><b>Policy 15:</b> <i>Areas outside SNAs that support specified highly mobile fauna are identified and managed to maintain their populations across their natural range, and information and awareness of</i></p>	<p><b>Clause 3.20:</b> Specified highly mobile fauna</p>	<p>N/A - the IB Chapter does not include any specific provisions relating to specified highly mobile fauna.</p>	<p>Clause 3.20 requires NRC to undertake further technical work to record areas outside SNAs that are “highly mobile fauna areas” working with landowners, tangata whenua, territorial authorities and DOC. Once these areas have been identified, district plans must include provisions to “maintain viable populations of specified highly mobile fauna across their natural range”. It is therefore not practicable or appropriate to give effect to Policy 15 and Clause 3.20 through the PDP until the regional council has undertaken this technical work and engagement to record highly mobile fauna areas.</p> <p><b>Recommendation:</b> Policy 14 and Clause 3.22 are given effect to through a future district plan change which implements the NPS-IB in full.</p>

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<i>highly mobile fauna is improved.</i>			
<b>Policy 16:</b> <i>Regional biodiversity strategies are developed and implemented to maintain and restore indigenous biodiversity at a landscape scale.</i>	<b>Clause 3.23:</b> Regional biodiversity strategies <b>Appendix 5:</b> Regional biodiversity strategies	N/A – regional biodiversity strategies are outside the scope of the PDP.	<b>Recommendation:</b> No amendments are required as regional biodiversity strategies are to be developed by regional councils and are outside the scope of the PDP.
<b>Policy 17:</b> <i>There is improved information and regular monitoring of indigenous biodiversity.</i>	<b>Clause 3.24:</b> Information requirements <b>Clause 3.25:</b> Monitoring by regional councils	N/A - there are no specific provisions in the PDP relating to information requirements for resource consent applications having more than minor effects on indigenous biodiversity. Clause 3.25 does not apply to district councils.	Clause 3.24 provides clear direction that local authorities must make changes to plans to require that resource consent applications resulting in more than minor adverse effects are not considered unless they contain a report addressing matters set out in Clause 3.24(2). The report must also be prepared by a suitably qualified ecologist and/or person with suitable expertise and be commensurate with the scale and significance of the proposal. The requirements in Clause 3.24 could potentially impose significant costs on applicants as many of the assessment matters are extensive and highly technical (e.g. identification of ecosystem services at the site, assessment of ecological integrity and connectivity). In my opinion, information requirements are better addressed as part of the suite of provisions required to give full effect to the NPS-IB through a future plan change. Further, the potential costs of these requirements cannot be properly assessed at this point of time. <b>Recommendation:</b> Policy 17 and Clause 3.24 in the NPS-IB are given effect to through a future plan change process which implements the NPS-IB in full.