Section 35 Evaluation Report

Indigenous biodiversity

29 October 2024

horizons
REGIONAL COUNCIL

Author
Robert Marshall – Senior Policy Analyst

Acknowledgements to
Lorraine Cook - Environmental Scientist Ecology
Nicolaas Portegys – Team Leader Policy
Leana Shirley – Senior Policy Planner
Maria Reiche – Graduate Policy Analyst
Pen Tucker – Senior Policy Planner
Erin Murphy – Senior Policy Analyst
Josh Kendrew - Graduate Policy Analyst Planner
Charlotte Almond – Manager Policy and Strategy
Craig Davey - Biodiversity, Biosecurity and Partnerships Manager
Ruth Fleeson – Senior Biodiversity Advisor Priority Habitats
Sara Westcott – Team Leader Consents
Laura Hickey – Environmental Scientist
Sarah Williams – Senior Environmental Educator
Members of the Information Management Team
Members of the Consents Compliance Team
Members of the Finance Team

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CONTACT 24 hr freephone 0508 800 80 Help@horizons.govt.nz www.horizons.govt.nz

SERVICE CENTRES	REGIONAL HOUSES	DEPOTS
Kairanga Cnr Rongotea and Kairanga-Bunnythorpe Roads Palmerston North	Palmerston North 11-15 Victoria Avenue	Taihape 243 Wairanu Road Taihape
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Taumarunui 34 Maata Street		

POSTAL ADDRESS Horizons Regional Council, Private Bag 11025, Manawatū Mail Centre, Palmerston North 4442 F 06-952 2929

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Executive Summary

This evaluation considers the parts of the One Plan that address indigenous biodiversity in the region. These provisions are spread across multiple chapters of the Regional Policy Statement (RPS) and Regional Plan (RP). Of particular relevance are Chapter 6, Chapter 13 and Schedule F.

The RPS has one objective (Objective 6-1) in relation to indigenous biodiversity. This is to protect areas of significant indigenous vegetation and significant habitats of indigenous fauna and maintain indigenous biological diversity, including enhancement where appropriate.

In some cases effective systems have not been established to measure if the anticipated environmental results (AERs) have been achieved. In other cases, AERs cannot be measured due to changes in approaches to protecting and enhancing significant indigenous biodiversity. For example, the 'top 100 wetlands and top 200 bush remnants' programme has been replaced by the Priority Habitats Programme. A future indigenous biodiversity plan change should be accompanied by a robust and enduring monitoring plan.

Despite an inability to state whether anticipated environmental results have been achieved, this evaluation has identified that the One Plan policies, methods and rules are largely considered to be effective in contributing towards Objective 6-1.

There is a combination of regulatory and non-regulatory indigenous biodiversity provisions in the One Plan, and this evaluation identifies that this combination works together in an effective manner. For example, non-regulatory education and advice services provided to land owners often result in positive decision-making in regards to indigenous biodiversity, prior to consenting processes being initiated.

Various Council departments are implementing non-regulatory provisions through a wide range of initiatives. Examples include physical works (such as enhancements via fencing, plantings and pest control), grant funding, information and advice services, and Enviroschools.

The regulatory provisions (including the relationship between Chapter 13 Rules and Schedule F) were also largely identified as being effective. An assessment of a sample of consents that have been granted identified that the One Plan indigenous biodiversity provisions are being applied correctly to consents, and appropriate consent conditions are being applied. Horizons' has also been actively engaging with land owners and territorial authorities to seek outcomes in resource consents and district plan reviews/changes that achieve the One Plan indigenous biodiversity objective.

One of the biggest challenges has been in regards to establishing programmes to monitor the effectiveness of protection and enhancement works. This is partly due to resourcing, but also due to a lack of methods to use that are nationally consistent, cost effective and able to be used in our region's indigenous biodiversity sites. Even though monitoring is limited, there can be confidence that works are producing benefits. As an example, the benefits of riparian stream fencing and planting are well documented in literature.

Deer and goats are one of the big limitations to Horizons' non-regulatory biodiversity work. Since the One Plan became operative, they have increased in extent and abundance across the country, and are now a much bigger threat to indigenous biodiversity than in the past. They are now preventing regeneration in forests and wetlands throughout the region.

An assessment has been undertaken to identify the extent to which the One Plan aligns with the National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB). It identified high levels of dis-alignment or partial alignment. A significant component of a future (indigenous biodiversity focused) plan change will be responding to the NPS-IB requirements.

This report has identified future considerations for improvement in many instances, including for provisions that are generally considered to be effective.

1 Introduction

The One Plan is the consolidated resource management planning document for the Horizons Region. It combines the Regional Policy Statement (RPS), Regional Plan and Regional Coastal Plan. The One Plan defines how the natural and physical resources of the region will be cared for and managed by Horizons Regional Council (Horizons) in partnership with Territorial Authorities and the community. The Proposed One Plan was notified in 2007 and was made fully operative in December 2014.

Since 2014 the One Plan has been amended four times and changed twice to meet mandatory requirements of national policy statements and national environmental standards. At the time of preparing this evaluation, further amendments and plan changes are in progress. Planning practice now includes considering these 'higher order' documents alongside the One Plan provisions to ensure they are given effect.

In regards to indigenous biodiversity, Chapter 6[1] of the One Plan addresses:

> *"The maintenance of indigenous biological diversity, the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna, and the division of responsibilities between the Regional Council and Territorial Authorities for managing indigenous biological diversity".*

Furthermore, the One Plan has a particular focus on four keystone environmental issues. Threatened indigenous biodiversity is one of these issues. The One Plan defines the problem as:

> *"Due to more than a century of landscape modification, the Region has lost much of its indigenous habitat. Habitat remnants continue to be threatened by land development and by pest plants and pest animals".*

2 Purpose of this report

The purpose of this evaluation is to assess the effectiveness and efficiency of the One Plan's indigenous biodiversity provisions, primarily contained in Chapter 6: Indigenous biological diversity, landscape and historic heritage and Chapter 13: land use discharges and indigenous biological diversity. The evaluation has been initiated, in part, in response to the release of the National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB), but is also required by s35(2)(b) of the Resource Management Act 1991 (RMA).

In general, evaluation provides an essential check on the practicability of objectives, and the capacity for stated policies, methods and targets to be achieved subject to resourcing levels, budget constraints and other circumstances. In this case, the evaluation will also provide guidance to determine the One Plan's alignment with the NPS-IB and guide future plan changes.

Evaluation reporting is evidence-based, making use of available data, records and officer experience of implementation. The following questions have helped guide the evaluation process:

Plan effectiveness	Plan efficiency

[1] Note: Plan amendment 3 – National Planning Standards has resulted in major amendments to the One Plan formatting (including chapter and provision numbers). The way provisions are referenced in this report are 'pre-plan amendment 3', for consistency with earlier section 35 evaluations.

• Are anticipated environmental results and objectives being achieved?
• Is there evidence that the policies and methods are being used/applied in an effective way?
  ○ Do the plan provisions have the support of users – is the plan perceived to work; are the provisions enforceable?
  ○ Can the Plan be reasonably implemented?
• Do the provisions give effect to the NPS-IB?
• Do the provisions give effect to other national policy statements?
	• Are the regulatory, consenting and administrative costs in line with what was expected/budgeted?
	• Are there additional costs/risks/time and resource implications created as a result of the provisions?
	• Are outcomes generally being delivered at an acceptable rate?
	• Is the workload implicit in the policy manageable?

3 Statutory context

3.1 Resource Management Act 1991

The RMA provides a well-established framework for the evaluation, monitoring and review of regional policy statements (RPS) and regional plans. As set out in s35(2)(b) of the RMA, every local authority is required to monitor the effectiveness of the policies, rules and methods in its plan, and to prepare a report on the results of this monitoring every five years as per s35(2)(a). Monitoring the efficiency and effectiveness of policies, rules and other methods is an ongoing process from plan implementation to plan review. Plan monitoring closes the loop in the 'plan-do-monitor-review' cycle; such monitoring provides information on how well the One Plan is working 'on the ground', and helps determine whether changes to the One Plan need to be made if the objectives and anticipated environmental results have not been achieved.

Further, under s79 regional councils must commence a review of any provision of a regional policy statement or regional plan, if the provision has not been a subject of a proposed policy statement or plan, a review, or a change by the local authority during the previous 10 years. The Indigenous Biodiversity provisions have not been reviewed since the One Plan was made fully operative in December 2014, therefore a review of these provisions should commence by December 2024.

3.2 Biosecurity Act 1993

The Biosecurity Act provides the legal framework to help keep harmful organisms out of New Zealand. It also provides the framework for how we respond, and manage them, if any do make it into the country. It covers:

- pre-border risk management and standard setting
- border management
- readiness and response
- long term pest management

At the time of writing this evaluation, the government is in the process of consulting on proposed amendments to the Biosecurity Act[2].

Regional Pest Management Plan

Horizons has a pest management plan which it follows to control and manage pests (animals and plants) in the region. Under the Biosecurity Act 1993 there is a statutory requirement to draft a revised plan by November 2027.

Sections 71 and 74 of the Biosecurity Act 1993 outline requirements for the preparation of Regional Pest Management Plans to consider whether the council is satisfied that the proposal is not inconsistent with a regional policy statement or regional plan.

3.3 National Policy Statements

The **National Policy Statement for Indigenous Biodiversity (NPS-IB)** came into force on 4 August 2023. The key aim of the NPS-IB is to help maintain indigenous biodiversity across Aotearoa. This is primarily achieved by requiring councils to identify areas of significant indigenous biodiversity, generally referred to as 'significant natural areas' or 'SNAs', and manage any adverse effects on them from new development and surrounding activities. The NPS-IB is limited to terrestrial (land) ecosystems and some wetlands.

As a result of the NPS-IB, Council will need to review the One Plan in the coming years to reflect the NPS-IB requirements, meaning there will likely be changes to existing plan rules and other work council does for indigenous biodiversity.

Under the RMA, all councils must identify areas with significant native biodiversity. However, councils across the country have different criteria for identifying these areas and use different methods to maintain them. To address this, the criteria for identifying and managing these significant areas under the NPS-IB have now been made the same across the country.

Other requirements of the NPS-IB include: councils working to restore important areas or features that have been degraded over time; preparing regional biodiversity strategies to guide efforts at a regional level; and monitoring the condition and extent of biodiversity to understand what changes are taking place.

The implementation requirements address Te Tiriti o Waitangi (the Treaty of Waitangi) principles by providing more flexible and locally developed approaches for Māori land. The NPS-IB recognises the historical barriers tangata whenua have faced in occupying, using, and developing their land and the disproportionate extent of indigenous biodiversity on that land compared to general land. The NPS-IB includes specific provisions to acknowledge the implications of these historic differences. It seeks to strengthen the role of tangata whenua as partners with councils in the management of indigenous biodiversity, recognising the role of tangata whenua as kaitiaki.

On 14 March 2024, the Government announced they have agreed to suspend the requirement for councils to comply with the SNAs within the NPS-IB for three years. This will likely affect the timing of any future review and plan change associated with the terrestrial biodiversity provisions of the One Plan. At the time of writing this evaluation, no formal amendment to the NPS-IB has been made.

It is worth noting that biodiversity is managed differently in the Manawatū-Whanganui Region to other regions. The One Plan establishes that the Regional Council is responsible for providing a region-wide approach for the maintenance and enhancement of indigenous

[2] Source: https://www.mpi.govt.nz/consultations/proposed-amendments-to-the-biosecurity-act/

biodiversity, including rules controlling land use and non-regulatory programmes. The High Court confirmed that this allocation of responsibilities is appropriate and lawful under the Resource Management Act (section 62(1)(i)), and this was supported in principle by all of the region's constituent territorial authorities[3].

The **National Policy Statement for Freshwater Management 2020 (NPS-FM)** has been considered under a separate Section 35 Evaluation Report for Freshwater Provisions. Freshwater management has linkages with biodiversity management and some cross over exists between separate Section 35 Evaluation Reports.

The New Zealand Coastal Policy Statement 2010 (NZCPS) has been considered under a separate Section 35 Evaluation Report for Coastal Provisions[4]. Coastal management has linkages with biodiversity management and some cross over exists between separate Section 35 Evaluation Reports.

3.4 New Zealand Biodiversity Strategy

'Te Mana o Te Taiao - Aotearoa New Zealand Biodiversity Strategy 2020' sets a strategic direction for the protection, restoration and sustainable use of biodiversity, particularly indigenous biodiversity, in Aotearoa New Zealand[5]. It provides the overall strategic direction for biodiversity in Aotearoa New Zealand for the next 30 years. It is intended to guide all those who work with or have an impact on biodiversity, including local government.

3.5 One Plan

One Plan RPS Chapter 10: Administration states that the Regional Council will regularly check the effectiveness of the policies and methods in this Plan in achieving anticipated environmental results. It was intended that this would be done every three years at the same time as reporting progress made by the community in achieving community outcomes for the Region[6].

Monitoring and reporting on the effectiveness of the One Plan will be based on the following process:

a) *Evaluation of the Regional Council's Annual Reports and the policies and methods in this Plan to assess which policies and methods have been implemented,*
b) *Evaluation of the Long Term Council Community Plan [sic] and Annual Reports to assess actual work done to implement this Plan compared to the intended level of work each year, including consent, compliance and environmental incident response activity,*
c) *Evaluation of the results of environmental monitoring carried out under the Regional Monitoring Strategy to assess the condition and trends of the Region's environment, with an emphasis on those parts of the environment where specific work has been done to make improvements, and*

[3] Significant Natural Areas (SNAs) are not individually identified or mapped (on a site-basis) in the One Plan. Instead, the One Plan sets out criteria to assess the significance of areas of indigenous vegetation or habitats in the regional plan, and includes a schedule of habitat types (Schedule F). These habitat types are defined and classified as 'Rare', 'Threatened', or 'At-risk'. Policies and objectives are tied to these habitat type classifications. Resource consent is needed for activities that adversely affect any area of indigenous biodiversity or habitat that meets the definition of any of the habitat types listed in Schedule F and meets inclusion criteria and does not meet exclusion criteria.

[4] And briefly in the Natural Hazards Evaluation.

[5] https://www.doc.govt.nz/globalassets/documents/conservation/biodiversity/anzbs-2020.pdf

[6] Community outcomes are set through the region's Long-Term Plan under the Local Government Act 2002, and formal triennial reporting was a requirement under that legislation. The 2010 amendment to the Local Government Act 2002 has compromised the function of the evaluation and reporting regime set out in Chapter 10; this will be evaluated in the Administration s35 evaluation.

d) *Assessment of whether changes need to be made to policies and methods where there is slow or no progress toward achieving anticipated environmental results.*

Chapter 10 then continues that changes to the One Plan will be sought when:

a) Plan effectiveness monitoring identifies the need to enhance progress toward achieving anticipated environmental results, or
b) Major resource management developments arise such as significant amendments to the RMA or the adoption of national policy statements or national environmental standards by Government that have major implications for the contents of this Plan, or
c) The results of new scientific work enhance this Plan and make plan provisions more certain for resource users.

Changes to the Regional Policy Statement can be requested only by a Minister of the Crown or any of the ten Territorial Authorities within the region, while changes to the Regional Plan may be requested by any person. The process used for any review or change to the One Plan is set out in Schedule 1 to the RMA.

As referenced above, Chapter 10 relied partly on Long Term Council Community Plans, which were a requirement under Section 279 of the Local Government Act to monitor the One Plan. However, Section 279 was repealed in 2010 and LTCCP's are no longer a requirement of local government. Instead, Councils are required to prepare Long Term Plans, with monitoring and reporting now included in Annual Reports prepared by Council.

Given updates to the LGA and changes over time, consideration of the effectiveness and efficiency of Chapter 10 has been considered alongside the other administrative chapters of the One Plan in a separate s35 evaluation.

4 Evaluation scope

The scope of the evaluation is limited to chapters within the One Plan that relate most directly to indigenous biodiversity. These provisions are listed in the following table:

One Plan chapter to be reviewed:	Specific provisions subject to review	Comment
Chapter 6: Indigenous biological diversity, landscape and historic heritage	Those related to indigenous biodiversity: Issue 6-1, Objective 6-1, Policies 6-1 to 6-5 and related methods and AER.	Where these provisions relate to freshwater, including wetlands, they are also reviewed in the freshwater evaluation.
Policy 8-4	Policy 8-4 as it relates to indigenous biodiversity.	While Chapter 8: Coast is being considered as part of a separate evaluation, Policy 8-4 includes an IB component.
Chapter 13: Land use activities and indigenous biological diversity	Those related to indigenous biodiversity: Objective 13-2, Policies 13-3 to 13-5 and all rules.	Components of provisions that do not relate to indigenous biodiversity are out of scope and are reviewed as part of separate evaluations.
Chapter 19: Financial contributions	Provisions as they relate to indigenous biodiversity.	Chapter 19 will be reviewed in full as part of a separate evaluation.
Schedule F: Indigenous biological diversity		
Chapters out of scope		
Administration Chapters (1, 10, 11 and 12		These are being considered as part of a separate evaluation.
Chapter 2: Te Ao Māori		A separate evaluation of this chapter is being undertaken, however, Chapter 2 is intrinsically linked to biodiversity management and some cross over exists.
Chapter 6: Indigenous biological diversity, landscape and historic heritage	Provisions related to Landscape and historic heritage .	These are being considered as part of a separate evaluation.
	Methods 6-1, 6-3, 6-4 are partially within scope.	These methods relate purely to aquatic biodiversity, which has been addressed in the freshwater evaluation (the assessments included in this report are supplementary).
Chapters 8 and 18: Coast, Coastal Marine Area	Policy 8-4 is partially within scope.	These are being considered as part of a separate evaluation.

Schedule B: Surface Water Management Values		This schedule is considered in the freshwater evaluation.

Table 1: Specific One Plan Chapters to be evaluated under section 35 of the RMA.

5 Evaluation

The One Plan Regional Policy Statement includes the following issue and objective relating to indigenous biodiversity:

Issue 6-1: Indigenous biological diversity	Indigenous biological diversity is not being maintained in the Region. As a result of historical land development practices, only a small proportion of the original extent of indigenous habitats remains. The diversity within remaining areas is declining owing to their isolation or as a consequence of a range of activities, most notably: (a) pest plants and pest animals (b) stock access (c) land drainage, which impacts upon wetlands (d) perched culverts and other barriers to fish migration (e) run-off and discharges causing poor water quality (f) *vegetation clearance**.

Objective 6-1: Indigenous *biological diversity*^	Protect areas of significant indigenous vegetation and significant habitats of indigenous fauna and maintain indigenous *biological diversity*^, including enhancement where appropriate.

The table below outlines the linkages between the objective, policies and methods, and the anticipated environmental outcomes and performance indicators.

ONE PLAN: indigenous biodiversity linkages				
Objectives (RPS)	Supporting Policy Framework	Methods & other supporting provisions	Anticipated environmental results	Indicators
Objective 6-1 Indigenous *biological diversity*^	Policies 6-1, 6-2, 6-3, 6-4 and 6-5	**RPS:** Methods 6-1, 6-2, 6-3, 6-4, 6-5, 6-6, 6-7 and 6-9 **RP:** Objective 13-2 Policies 13-3, 13-4 and 13-5 Rules 13-1 to 13-9 Chapter 19 Policies	Except for change because of natural processes, or change authorised by a resource consent, by 2017, the extent of *rare habitat**, *threatened habitat** or *at-risk habitat** is the same as (or better than) that estimated prior to this Plan becoming operative, and the number of *at-risk habitats** has not increased.	• Extent of each habitat type compared to former extent • Number of ***rare habitats****, ***threatened habitats**** and ***at-risk habitats**** damaged by unauthorised activities
			By 2017, the Region's top 100 wetlands and top 200 bush remnants will be in better condition than that measured prior to this Plan becoming operative.	• Number of top 100 wetlands and top 200 bush remnants under proactive management • Habitat condition measure(s) which, where possible, will be consistent with those used by the Department of Conservation

5.1 Effectiveness assessment

As shown in the above table, Objective 6-1 is implemented through:

a. Policies 6-1, 6-2, 6-3, 6-4, and 6-5 in Chapter 6 of the Regional Policy Statement.
b. Methods 6-1, 6-2, 6-3, 6-4, 6-5, 6-6, 6-7 and 6-9 in Chapter 6 of the Regional Policy Statement.
c. Provisions in the Regional Plan related to indigenous biodiversity (Objective 13-2, Policies 13-3 to 13-5, all Chapter 13 rules and Chapter 19 policies).

Other instruments such as District Plans also give effect to the objective and policies.

This effectiveness assessment is structured as follows:

1. Effectiveness of Chapter 6 policies
2. Effectiveness of Chapter 6 methods
3. Effectiveness of Chapter 6 AERs
4. Effectiveness of Policy 8-4
5. Effectiveness of Chapter 13 rules
6. Effectiveness of Chapter 19 provisions relating to IB
7. Effectiveness of Schedule F
8. Giving effect to NPS-IB
9. Summary of effectiveness

5.1.1 Effectiveness of Chapter 6 policies

When undertaking the following assessments of policies, methods and rules, a key consideration has been whether they have been effective in achieving Objective 6-1:

Objective 6-1: Indigenous biological diversity^

Protect areas of significant indigenous vegetation and significant habitats of indigenous fauna and maintain indigenous biological diversity^, including enhancement where appropriate.

Objective 6-1 is seeking to address 'Issue 6-1: Indigenous biological diversity' (*"Indigenous biological diversity is not being maintained in the Region. As a result of historical land development practices, only a small proportion of the original extent of indigenous habitats remains..."*).

Anticipated Environmental Results identify the outcomes expected as a result of implementing the policies and methods in the regional policy statement, to achieve the objective. Anticipated Environmental Results are assessed in Section 5.1.3 of this report.

5.1.1.1 Policy 6-1 Responsibilities for maintaining indigenous biological diversity^

Policy 6-1 Responsibilities for maintaining indigenous biological diversity^

In accordance with s62(1)(i) RMA, local authority responsibilities for controlling *land*^ use activities for the purpose of managing indigenous *biological diversity*^ in the Region are apportioned as follows:

(a) **The Regional Council must be responsible for:**
(i) developing objectives, policies and methods for the purpose of establishing a Region-wide approach for maintaining indigenous *biological diversity*^, including enhancement where appropriate
(ii) developing *rules*^ controlling the use of *land*^ to protect areas of significant indigenous vegetation and significant habitats of indigenous fauna and to maintain indigenous *biological diversity*^, including enhancement where appropriate.

(b) ***Territorial Authorities*^ must be responsible for:**
(i) retaining schedules of notable trees and amenity trees in their *district plans*^ or such other measures as they see fit for the purpose of recognising amenity, intrinsic and cultural values associated with indigenous *biological diversity*^, but not for the purpose of protecting significant indigenous vegetation and significant habitats of indigenous fauna as described in (a)(ii) above.

(c) **Both the Regional Council and *Territorial Authorities*^ must be responsible for:**
(i) recognising and providing for matters described in s6(c) RMA and having particular regard to matters identified in s7(d) RMA when exercising functions and powers under the RMA, outside the specific responsibilities allocated above, including when making decisions on *resource consent*^ applications.

Has the Regional Council met its responsibilities under Policy 6-1(a)?

Yes – Policy 6-1(a) is achieved through the inclusion of the indigenous biodiversity provisions in the One Plan[7]. This was achieved when the One Plan became operative in 2014. This s35 report is evaluating the effectiveness and efficiency of those provisions.[8]

[7] The indigenous biodiversity provisions being referred to are those which are the focus of this report. They are discussed in greater detail over the coming pages of this report.
[8] Source: One Plan

The policy allocates responsibility for maintaining indigenous biodiversity in the region to the Regional Council. The One Plan does not map SNAs; instead, any area that meets the description of a rare, threatened or at-risk habitat type (in Schedule F) is subject to regional plan rules.

Have Territorial Authorities met their responsibilities under Policy 6-1(b)?

There are seven Territorial Authorities that fall entirely within the Horizons Region, and three Territorial Authorities that partly fall within the Horizons Region. The below table identifies whether Policy 6-1(b) is achieved within their District Plans[9].

Territorial authority[10]	Comment
Part Waitomo	The Waitomo District Plan does not include a schedule of notable trees and/or amenity trees. Feedback from staff at Waitomo District Council is that this is less applicable to their district. There are large quantities of significant indigenous biodiversity in the Waitomo District.[11]
Part Stratford	The Stratford District Plan includes a schedule of 'notable trees identified for protection', alongside provisions for the purpose of protecting their values.
Part Taupo	The Taupo District Plan includes a 'notable trees register' and an 'amenity tree register', alongside provisions for the purpose of protecting their values.
Ruapehu	The Ruapehu District Plan includes a schedule of notable trees, alongside provisions for the purpose of protecting their values.
Whanganui	The Whanganui District Plan includes 'Appendix C – Protected Trees', alongside provisions for the purpose of protecting their values. The trees in this register include an 'amenity' and 'notable' assessment.
Rangitikei	The Rangitikei District Plan includes a schedule of 'notable trees', alongside provisions for the purpose of protecting their values.
Manawatū	The Manawatū District Plan includes a schedule of 'notable trees', alongside provisions for the purpose of protecting their values. It also includes provisions for protecting natural areas and clearance of indigenous vegetation (including Appendix 1I and 1J).
Palmerston North City	The Palmerston North District Plan includes 'Appendix 17C Schedule of Notable Trees, Groups of Notable Trees, and Habitats of Local Significance', alongside provisions for the purpose of protecting their values.
Tararua	The Tararua District Plan includes schedules of natural resources, including a 'Schedule of Significant Trees', alongside provisions for the purpose of protecting their values.
Horowhenua	The Horowhenua District Plan includes a schedule of 'notable trees', alongside provisions for the purpose of protecting their values.

[9] A future plan change may also consider exploring whether any territorial authorities are not attempting wholesale protection of indigenous biodiversity in their district, due to the policy allocating responsibility to Horizons (this has not been identified as an issue within this evaluation report).
[10] Source: District Plans
[11] Source: C O'Callaghan, Waitomo District Council, personal communication, 19 June 2024.

On the whole, all of the region's Territorial Authorities give effect to policy 6-1(b) to varying extents in their district plans. Procedures are in place to ensure Horizons is involved in district plan changes and reviews, as detailed later in this report (see Method 6-7).

Have responsibilities under Policy 6-1(c) been met?

Yes - the responsibilities outlined in Policy 6-1(c) are legislative requirements. Under the RMA, "all persons exercising functions and powers..." have these responsibilities.[12]

It is noted that this provision has been harder to understand in the context of the slight tension between it and 6-1(a) and (b). Where Council have landed with the Territorial Authorities, after some initial difficulties with interpretation, is that this means the Territorial Authorities still need to include provisions that allow them to consider impacts on IB habitats in situations where Horizons have no jurisdiction – particularly their subdivision provisions[13].

Note: In relation to Policy 6-1(a-c), more analysis about the region's unique approach is included later in this report (see Section 5.1.7).

How has Policy 6-1 been applied to resource consents?

Data obtained from Horizons' consents database, IRIS, indicates 22 individual consents that refer to Policy 6-1 have been granted since the plan became operative[14].

The majority of these were land use consents, and there were also a small number of water permits and discharge permits.

Based on an assessment of a sample of these consents, reasons this provision has been tagged to consents include that the activities involve ecological effects to Schedule B values, and/or vegetation clearance within Schedule F rare, threatened or at-risk habitats. It could be said that the policy is being applied correctly to relevant resource consent applications (seeing as they relate to indigenous biodiversity sites). In saying this, Policy 6-2 is a more relevant provision because it relates to "regulation" as opposed to "responsibilities". Unsurprisingly, many of the 22 individual consents that are tagged to Policy 6-1 are also tagged to Policy 6-2.

Is Policy 6-1 being applied appropriately and referenced consistently in consenting decisions?

As stated above, Policy 6-1 is less relevant than Policy 6-2 in the consenting context. Policy 6-1 is far more applicable to plan making, and consent numbers are not particularly relevant.

Summary and assessment of Policy 6-1 effectiveness:

Policy 6-1 is being implemented through the One Plan, District Plans, and consenting processes.

It is also noted that Council's Consents Team have provided feedback that this provision is beneficial in terms of outlining functions to One Plan users.[15]

[12] Source: RMA
[13] Source: P Tucker, personal communication, August 2024.
[14] Source: IRIS. Note: There is a belief among some staff that some consents have not been picked up through IRIS reports. For example, when looking at detailed lists (such as in response to LGOIMA requests), staff have found some consents were missing from the reports. This is something that should be considered throughout this report whenever reference is made to IRIS reports. Source: P Tucker, personal communication, October 2024.
[15] Source: S. Westcott and J. Mitchell, personal communication, 8 March 2024.

Future Considerations:

Because functions are divided between the Regional Council and Territorial Authorities, scenarios exist whereby a landowner may require resource consents from both the territorial authority and regional council. An example is where a landowner wishes to subdivide land containing significant indigenous biodiversity. It is important landowners are aware of this, as there are implications relating to time, cost and risk of consent/s not being granted. During District Plan changes, Horizons has sought the inclusion of an advice note highlighting that for plan users within the Horizons Region, resource consent will also be required for most activities carried out within areas of indigenous biodiversity, and requesting they contact Horizons for more information.

5.1.1.2 Policy 6-2 Regulation of activities affecting indigenous *biological diversity^*

Policy 6-2 Regulation of activities affecting indigenous *biological diversity^*

For the purpose of managing indigenous *biological diversity^* in the Region:

a. Habitats determined to be ***rare habitats**** and ***threatened habitats**** under **Schedule F** must be recognised as areas of significant indigenous vegetation or significant habitats of indigenous fauna.

b. ***At-risk habitats**** that are assessed to be significant under Policy **13-5** must be recognised as significant indigenous vegetation or significant habitats of indigenous fauna.

c. The Regional Council must protect ***rare habitats****, ***threatened habitats**** and ***at-risk habitats**** identified in (a) and (b), and maintain and enhance other ***at-risk habitats**** by regulating activities through its regional plan and through decisions on resource consents^.

d. Potential adverse *effects^* on any ***rare habitat****, ***threatened habitat**** or ***at-risk habitat**** located within or adjacent to an area of ***forestry**** must be minimised.

e. When regulating the activities described in (c) and (d), the Regional Council must, and when exercising functions and powers described in Policy **6-1**, *Territorial Authorities^* must:

   i. allow activities undertaken for the purpose of pest plant and pest animal control or habitat maintenance or enhancement,

   ii. consider indigenous *biological diversity^* offsets in appropriate circumstances as defined in Policy **13-4**,

   iii. allow the ***maintenance****, ***operation**** and ***upgrade**** of *existing structures^*, including infrastructure^ and other physical resources of regional or national importance as identified in Policy **3-1**, and

f. not unreasonably restrict the existing use of production land^ where the effects of such land^ use on ***rare habitat****, ***threatened habitat**** or ***at-risk habitat**** remain the same or similar in character, intensity and scale.

Is Policy 6-2 regulated through the One Plan and District Plans?

Policy 6-2(a-d) is achieved through Regional Plan Chapter 13 provisions (including Objective 13-2, Policy 13-3, Policy 13-4, Policy 13-5, and Chapter 13 Rules), and Schedule F. This is implemented via Horizons' Regulatory Team.

For the Regional Council, Policy 6-2(e-f) is also achieved through Regional Plan Chapter 13 provisions.[16] The effectiveness of these rules are discussed later in this report.

For Territorial Authorities, Policy 6-2(e-f) is achieved through District Plans. Feedback on the effectiveness of these provisions was sought from District Councils, but responses specific to this provision were not provided.

Note: Feedback from staff at Waitomo District Council noted that the large area of the district in comparison to the number of ratepayers can create challenges in exercising functions, including enforcement[17].

How has Policy 6-2 been applied to resource consents?

Data obtained from Horizons' consents database, IRIS, indicates 57 individual consents that refer to Policy 6-2 have been granted since the plan became operative (Note: It is unsurprising this number is higher than consents referring to Policy 6-1, as Policy 6-1 is less relevant than Policy 6-2 in the consenting context).

The majority of these were land use consents, and there were also a small number of water permits and discharge permits.

An assessment of a sample of these consents revealed the same findings as the assessment of the consents that refer to Policy 6-1, i.e. reasons this provision has been tagged to these consents include that the activities include vegetation clearance or other activities within close proximity of Schedule F rare, threatened or at-risk habitats.

From this data, it can be inferred that the policy is consistently being applied correctly to relevant resource consent applications.[18]

It is also noted that Horizons offers free habitat assessments to identify Schedule F habitat prior to a resource consent application being lodged. These are carried out by the Science team ecologists. The result is generally that, if Schedule F habitat is found, the applicant doesn't continue to pursue the proposed activity, so it has the effect of reducing the number of resource consents that get lodged in Schedule F habitat. Dozens of assessments are undertaken each year[19].

Summary and assessment of Policy 6-2 effectiveness:

Policy 6-2 is implemented through the One Plan, District Plans, and consenting processes.

5.1.1.3 Policy 6-3 Proactive management of indigenous biological diversity^

Policy 6-3 Proactive management of indigenous biological diversity^

a. The Regional Council will aim to maintain or enhance indigenous *biological diversity*^ by working in partnership with relevant landowners, other parties with a legal interest in the *land*^, and relevant consent holders to establish a management plan and incentive programme for the voluntary proactive management of identified ***sites**** by 2016.

b. For the purposes of (a), separate programmes will be established for *wetlands*^, bush remnants, native fish communities and coastal ecosystems.

[16] Source: One Plan
[17] Source: C O'Callaghan, Waitomo District Council, personal communication, 19 June 2024.
[18] Source: IRIS
[19] Source: L Cook, personal communication, September 2024.

c. The management plans under (a) will generally address the following matters as a minimum:

i. fencing and prevention of stock access

ii. pest plant and pest animal control

iii. planting

iv. agreed land^ uses

v. work and materials to be provided by the Regional Council or a third party

vi. financial assistance to be provided by the Regional Council or a third party

vii. monitoring

viii. legal options for ensuring longevity of the measures implemented.

Were management plans and incentive programmes established for the voluntary proactive management of identified sites*, in accordance with Policy 6-3?

Prior to 2019, the Top 200 bush remnants and Top 100 wetlands programmes were active, having become operative in 2007/08. The scoping work for these programmes resulted in a huge number of forest and wetland sites being identified, mapped and surveyed across the region. Many of the sites surveyed were later the recipients of biodiversity protection works and/or became an ongoing part of the Top 200/100 programme. Thanks to those programmes, more than 700 biodiversity sites were fenced and/or received pest plant control with assistance from Horizons.

In 2019, the Top 200 bush remnant and Top 100 wetland programmes were replaced by the Priority Habitats programme. The primary objective of the Priority Habitats programme is to manage a representative range of all the natural ecosystems that originally gave the region its character. Of the 71 ecosystem types in the Horizon region, 34 types are considered high priority for protection due to there being less than 50% of their former extent remaining and only small amounts represented on public conservation land[20].

The biodiversity Team actively works to increase the number of priority ecosystems receiving ongoing protection. There are 34 ecosystem types identified as a priority for protection. The Priority Habitats programme currently manages 95 sites which contain 31 of the priority ecosystems as well as 7 other native ecosystem types[21].

The Priority Habitats programme seeks out sites where remnants of these priority ecosystems persist, in order to protect and preserve the natural biodiversity there. The programme is non-regulatory, relying on the willing participation of the landowners[22]. Horizons' Biodiversity Team produce management plans[23] for priority habitats - staff write the plans and implement the work.

Prior to the establishment of the Priority Habitats Programme, Horizons would undertake protection work (such as fencing and pest control) but not ongoing maintenance. Ongoing maintenance did not occur due to lack of resourcing, and also due to different priorities (i.e. the Top 200 bush remnants and Top 100 wetlands programmes were more about protecting as many sites as possible from immediate threats (grazing and transformer weeds), rather than about managing them for ongoing restoration purposes).

Records of how many sites Horizons has provided one off funding for are shown below[24].

[20] Source: L Cook, personal communication, July 2024. Figures as at July 2024.
[21] Source: L Cook, personal communication, July 2024. Figures as at July 2024.
[22] Source: https://www.horizons.govt.nz/managing-natural-resources/biodiversity-and-totara-reserve/priority-habitats-programme
[23] All of our managed sites have planned works – whether site visits for weed surveillance, or fencing etc. The management plans are in the form of a 'planned works spreadsheet' that records the planned management actions at each site (as opposed to written documents). Source: R Fleeson, personal communication, September 2024.
[24] Source: L Cook, personal communication, July 2024. Figures as at July 2024.

	# of known biodiversity sites in Horizons region	# sites assessed by Biodiversity staff	Proportion of known sites assessed	Total # of sites that have received Horizons contribution	Proportion of known sites with Horizons contribution	# of sites that are now part of PH programme (i.e. that are actively managed)
Terrestrial	1010	620	61%	537	53%	70
Wetland	375	186	50%	214	57%	25
Total	**1,385**	**806**	**58%**	**751**	**54%**	**95**

In relation to Policy 6-3(b), two separate programmes have been established since the One Plan was made operative:

- Native fish communities – refer to Freshwater evaluation.
- Wetlands^, bush remnants, and coastal ecosystems (the Priority Habitats Programme)[25].

The Management Plans prepared by the Horizons Biodiversity Team address the matters outlined in Policy 6-3(c). In relation to Policy 6-3(C)(iv), the surrounding site is also addressed (e.g. ensuring paddocks by a wetland are not drained). In relation to Policy 6-3(C)(vii & viii), staff do not:

- monitor Schedule F sites (but staff do assess and map as them as required for public information requests or resource consents), or
- undertake monitoring for QEII or Department of Conservation covenants.

Incentive Programme

An incentive programme has been established, in accordance with Policy 6-3(a). This has been achieved through the establishment of Horizons' Kanorau Koiora Taketake - Indigenous Biodiversity Community grant.[26] This grant empowers communities to reconnect with and improve indigenous biodiversity. The programme operates as a contestable process, supporting both one-off and multi-year project grants. Projects may involve the restoration and guardianship or kaitiakitanga of indigenous biodiversity, supporting the regeneration and continuation of mātauranga Māori (Māori knowledge) through the enhancement and regeneration of biodiversity. Since the grant's establishment in 2021, 36 projects have been funded. These projects include dune restoration, riverbank stabilisation, pest plant/animal control, fencing to exclude stock, purchasing tools for community planting days, native bat monitoring, and the development of a plant nursery[27].

Icon Projects and Totara Reserve

The Biodiversity Team supports Icon biodiversity projects where there is significant community interaction with these sites. The Icon projects are Te Āpiti Manawatū Gorge, Kia Wharite in the Ruapehu, Pūkaha Mount Bruce, Bushy Park and Manawatū Estuary. As a part of the 2024-34 Long-term Plan process Council added a sixth Icon site (Ruahine Kiwi Trust).

Horizons also implements Policy 6-3 by undertaking ecological enhancements at Totara Reserve. Totara Reserve has a separate reserve management plan, prepared in accordance with the Reserves Act 1977[28].

How has Policy 6-3 been applied to resource consents?

[25] The Top 200 bush remnants and Top 100 wetlands programmes were also established, but they have been superseded by the Priority Habitats Programme.
[26] Source: https://www.horizons.govt.nz/about-our-region-and-council/grants-and-sponsorship/biodiversity-grants
[27] Source: L Cook, personal communication, September 2024.
[28] Source: C Davey and R Fleeson, personal communication, 12 March 2024.

Data obtained from Horizons' consents database, IRIS, indicates 17 individual consents that refer to Policy 6-3 have been granted since the plan became operative[29].

Activities ranged from undertaking land disturbance and vegetation clearance within Schedule F habitats to construction works and discharges.

Based on an assessment of a sample of these consents, consent conditions did not require the establishment of management plans (nor were management plans provided as part of applications). Instead, other initiatives were utilised, such as voluntary establishments of QEII covenants, and consent conditions that required new plantings, access restrictions, vegetation clearance outside of bird nesting seasons, and compliance with an erosion and sediment control plan. In each case, reference to Policy 6-3 was likely to have been made due to the consent relating to proactive management of indigenous biological diversity.

The wording of Policy 6-3 indicates that management plans are to be non-regulatory, and refers to "voluntary proactive management". Therefore it is appropriate that consent conditions have not required the establishment of management plans.

Summary and assessment of Policy 6-3 effectiveness:

Policy 6-3 is being implemented, as management plans and incentive programmes have been established. The physical works and ongoing maintenance are helping to maintain and enhance indigenous biodiversity in the region. Community grants have proven particularly successful in empowering communities to contribute to the health of our region's ecosystems.

Future consideration:

The wording of Policy 6-3(b) contains ambiguity in regards to whether four separate programmes are required. When this provision is revisited as part of a future plan change, there is an opportunity to reconsider and remove ambiguity around the number and scope of programmes.

The wording of Policy 6-3 should also be revisited to consider better alignment with changes in policy approaches (i.e. the Top 200 bush remnant and Top 100 wetland programmes being replaced by the Priority Habitats programme).

5.1.1.4 Policy 6-4 Fostering an ethic of stewardship

Policy 6-4 Fostering an ethic of stewardship
The Regional Council will equip landowners and others with the information they need to act as good stewards for indigenous biodiversity, and to act responsibly and proactively. These initiatives will be additional to the Council-led programmes under Policy 6-3.

How has the Regional Council equipped landowners and others with the information they need to act as good stewards for indigenous biodiversity, and to act responsibly and proactively?

In addition to the Council-led programmes previously discussed under Policy 6-3, Council has undertaken numerous other initiatives[30]. These include:

[29] Source: IRIS
[30] Source: C Davey and R Fleeson, personal communication, 12 March 2024.

Initiative	Comments
Rural based workshops	Staff hold ad hoc rural based workshops to provide ecological advice. This involves experts running workshops/providing advice/doing show-and-tells onsite. These often occur on private properties, at ecological sites or in woolsheds.
Ballance Farm Environment Awards	Ballance Farm Environment Awards (BFEA) is an annual awards programme celebrating and promoting sustainable land management and good practices on New Zealand farms. Horizons Regional Council is a sponsor of the regional awards, which celebrate the best sustainable farm industry practices from entrants across the Manawatū-Whanganui region.
Rural Games, Central District Field Days, Tōtara Reserve Open Days	Horizons run stalls at both events, with staff available to answer questions about its activities, including in relation to indigenous biodiversity.
Staff time	Staff provide advice to landowners and others when this is sought – e.g. phone conversations, site visits and onsite management advice. This includes the 'free advice' service provided by the Consents, Biodiversity and District Advice teams, as well as on-site advice provided by land Management Officers. Note: The freshwater evaluation (Section 10.3) includes a section outlining the number of enquiries received by the Biodiversity Team. In a lot of cases, this advice helps support land owners make informed decisions and ensures, where needed, consents are applied for[31].
Publications	One Plan Information Sheets, Land Management Environmental Grants Sheets, Growing Poplars Factsheet, etc. – available from Horizons' website.[32]
Website	Horizons' website contains information to equip landowners and others with information they need to act as good stewards for indigenous biodiversity, and to act responsibly and proactively.

How has Policy 6-4 been applied to resource consents?

Data obtained from Horizons' consents database, IRIS, indicates three individual consents that refer to Policy 6-4 have been granted since the plan became operative[33].

These were for the following activities, which involved Schedule B values and/or Schedule F habitats to:

- Undertake the discharge of agrichemicals onto and into a wetland. The primary purpose of the application was to facilitate wetland enhancement.
- Create a new entrance to the Manawatū River from within a park.
- Undertake land disturbance and vegetation clearance along the banks of a stream. The purpose of removing this vegetation was to establish a mix of native vegetation along the banks of the stream to improve biodiversity and to support aquatic life in the stream.

[31] Source: L Shirley, personal communication, July 2024.
[32] Source: https://www.horizons.govt.nz/publications-feedback/one-plan-supporting-documents/one-plan-factsheets & https://www.horizons.govt.nz/managing-natural-resources/land
[33] Source: Iris

Policy 6-4 is being implemented through a variety of non-regulatory methods. Therefore it is logical that Policy 6-4 has rarely been referred to in consenting assessments. In those examples where it has been used in consenting decisions, the policy has been applied and referenced appropriately.

Is there any evidence of resistance from landowners to receiving this information and changing their practices, which has resulted in enforcement action being undertaken?

On a limited number of occasions, Horizons' Consents Monitoring Team have encountered instances of unauthorised activities. This team have provided records of nine instances whereby abatement notices have been issued, two instances whereby infringement notices have been issued, and two instances of prosecutions[34]. See Section 5.1.3 of this report.

Summary and assessment of Policy 6-4 effectiveness:

Through various non-regulatory initiatives, Council has equipped landowners and others with the information they need to act as good stewards for indigenous biodiversity, and to act responsibly and proactively. This policy is therefore considered to be effective.

5.1.1.5 Policy 6-5 Pest plants and pest animals

Policy 6-5 Pest plants and pest animals

a. To the extent that they relate to the maintenance of indigenous biodiversity, the pest plant and pest animal management functions of the Regional Council will primarily target pests threatening ***rare habitats****, ***threatened habitats**** and ***at-risk habitats****

b. When exercising functions and powers as set out in Policy **6-1**, *Territorial Authorities*^ must take into account the risks of introducing pest plants or pest animals into ***rare habitats****, ***threatened habitats****, at-risk habitats* and nearby areas.

Have the pest plant and pest animal management functions of the Regional Council been delivered in accordance with Policy 6-5(a)?

The pest plant and pest animal management functions of the Regional Council are largely addressed through the Regional Pest Management Plan. The Regional Pest Management Plan exists to prevent new invasions of pest plants and manage the impacts of those pest plants already established.

There is a lack of alignment between the way Policy 6-5 is worded and the way the Regional Pest Management Plan 2017-37 is structured[35]. A key point of difference is that:

- Policy 6-5 requires a 'site led' approach, focussing efforts within rare habitats, threatened habitats and at-risk habitats.
- The Regional Pest Management Plan takes a 'species led' approach, focusing efforts on the exclusion, eradication, progressive containment or sustained control of specific pest animal and pest plant species.[36]

[34] Source: P Kinaston and A Stacey-Matthews, personal communication, 11 July 2024.
[35] This is likely to be the result of changes to the Biodiversity Act requirements after the One Plan was made operative.
[36] Source: https://www.horizons.govt.nz/HRC/media/Media/Pests/2017-2037-Regional-Pest-Management-Plan.pdf

Note: This lack of alignment does not inherently create an issue - if the species identified by Regional Pest Management Plan are primarily species which threaten Schedule F habitats. However, some of the rare habitats, threatened habitats and at-risk habitats contain pests that are not identified species in the RPMP (e.g. goats).[37]

A challenge identified with a 'site led' approach is in relation to landowner buy-in, including in relation to their ability to contribute time and money.

It is worth noting that:

- The Regional Pest Management Plan is developed under the Biosecurity Act 1993, whereas the One Plan is developed under the RMA. Each plan has strict legislative requirements, which will contribute to differences in approaches[38], and
- Sections 71 and 74 of the Biosecurity Act 1993 outline requirements for the preparation of Regional Pest Management Plans to consider whether the council is satisfied that the proposal is not inconsistent with a regional policy statement or regional plan.

A 2024 Evaluation of Horizons Regional Council Pest Management Plan included the following findings:

Pest category	Summary of findings
Exclusion plants	"Excellent progress has been made in preventing many plants establishing."
Eradication plants	"There are some good signs that progress towards eradication of these plants is being achieved. However, more effort and funding is needed for the majority of listed pests, which will have impacts on other species and activities."
Progressive containment plants	"While a lot of good work has occurred on controlling mapped progressive containment plants, progress towards achieving objectives has slipped."
Pest Animals	Excellent and timely efforts are being made to prevent wallabies establishing." "Rook control is on target, due to recent successes." "A number of suggestions for improvement (for possum control) are made." "Maintaining regional overview on rabbit issues is required."

It is noted that some of the non-regulatory initiatives undertaken by various council departments also contribute to pest plant and pest animal management, including within Priority Habitats Programme sites.

Have the Territorial Authorities' exercised functions and powers in accordance with Policy 6-5(b)?

This is a legislative requirement. Section 73 of the RMA requires district plans to give effect to a regional policy statement. During drafting of this evaluation report, Territorial authorities were invited to provide feedback on Policy 6-5. The feedback staff received did not include comments or concerns relating to Policy 6-5(b).

[37] Source: C Davey and R Fleeson, personal communication, 12 March 2024.
[38] Sections 70 and 71 of the Biosecurity Act 1993 have requirements that must be met when proposing species to be included in the Regional Pest Management Plan, including weighing up benefits versus costs of potential eradication or management approaches.

How has Policy 6-5 been applied to resource consents?

Data obtained from Horizons' consents database, IRIS, indicates four individual consents that refer to Policy 6-5 have been granted since the plan became operative[39] [40].

These were for the following activities (note: the first three bullet points below involved Schedule B values and/or Schedule F habitats):

1. For land disturbance and vegetation clearance in a threatened habitat and erection of a bridge over a river (the vegetation clearance was associated with the construction of the bridge).
2. To undertake the discharge of agrichemicals onto and into a wetland. The purpose of this consent included controlling pest plant species.
3. To construct fish passes, undertake vegetation clearance, and associated ancillary activities within watercourses. This included consent conditions in relation to preventing the spread of pest plants.
4. To discharge secondary treated domestic waste water into and onto land. This appears to be a case whereby a data entry errors has been made (the decision document for the consent does not refer to Policy 6-5).

For the first three consents listed above, the policy has been applied correctly. However, it is difficult to make generalisations from a sample size this small. As previously discussed, Policy 6-5 has largely been addressed through the implementation of the Regional Pest Management Plan.

Summary and assessment of Policy 6-5 effectiveness:

There is a lack of alignment between the way Policy 6-5(a) is worded and the way we actually undertake our pest management functions.

Regardless of the above, a 2024 Evaluation of Horizons Regional Council Pest Management Plan found that Council has been partially effective in its pest plant and pest animal management functions.

Future consideration:

Investigate opportunities to rectify the dis-alignment between One Plan Policy 6-5 and the Regional Pest Management Plan during the review of both documents.

[39] Source: IRIS

[40] Anecdotally, there is a concern that not all consents have been accurately recorded in IRIS. There may be instances where applicable One Plan provisions were not recorded (particularly for projects decide through appeal or by direct referral to the court. Considering that projects involving significant areas of IB habitat are often contentious and contested, there may be important consent decisions not captured via IRIS searches). Source: P Tucker, personal communication, August 2024.

5.1.2 Effectiveness of Chapter 6 methods

5.1.2.1 Method 6-1 Wetlands - Biodiversity

Method	Target
The Regional Council and other agencies will work with landowners to protect and enhance priority wetlands throughout the Region. Resources will be directed towards the most significant *sites**. Wetland owners will be provided advice and financial/project management assistance to carry out enhancement and protection measures including fencing, planting, and pest (plant and animal) control. The Regional Council will seek funding from third parties to assist with this method, and encourage the establishment of covenants. Monitoring of the effectiveness of the protection and enhancement works will be undertaken. This method will include publicity to increase public awareness about the importance of wetlands and indigenous biological diversity.	The top 100 wetlands in the Region are actively managed, including protection or enhancement measures, within 10 years of this Plan becoming operative.

Note: Method 6-1 was addressed from a water quality perspective in a separate freshwater evaluation. The assessment below adds to the findings of that evaluation by considering the method to a deeper extent.

What are the 'priority' wetlands in the region? Has the Regional Council and other agencies worked with landowners to protect and enhance priority wetlands? Were resources directed towards the most significant sites?

Due to the scale of wetland loss in the Horizons Region, all remaining wetlands have intrinsic value[41]. Most remaining wetlands are threatened by pest plants and animals and adverse surrounding land use. However, those that still retain a high degree of natural value and ecological integrity are recognised by Schedule F of the One Plan as being a higher priority for protection.

Since the One Plan became operative, the Top 100 Wetlands programme surveyed more than 300 wetlands in the region and ranked them on a priority scale of A (being high quality/high ecological condition) through to D (being of low quality or lacking natural ecological function), with the view of protecting up to 100 of the top ranked wetlands. This programme has been replaced with the Priority Habitats Programme in 2019 (discussed earlier in this report – see Policy 6-3). Council now manages priority wetlands as part of the Priority Habitats Programme. The Priority Habitats Programme is a habitat-led programme working with landowners to maintain and enhance priority sites on private land.

The Biodiversity and Science teams work with landowners or iwi to carry out ecological surveys to assess the type, structure and hydrological regime of a wetland, as well as provide information on the threats to wetland health (e.g. drainage, pest plants and animals) and suggest potential methods to help improve the wetland integrity (e.g. stock exclusion, restoration planting etc.).

Staff help direct landowners to funding for further help, e.g. through the contestable biodiversity (KKT) fund, the freshwater fund or the Priority Habitats programme within Horizons, or through

[41] All remaining wetland, regardless of ecological condition, is recognised nationally for its value, and is now protected through the policies and regulations established by the NES-F in 2020.

QEII and Nga Whenua Rahui. The Freshwater Team and Land Teams also often help with financial assistance for wetland fencing and planting.

In all cases, an effort is made to direct resources towards the most significant sites. While staff provide initial assessments and advice for any site regardless of quality, the subsequent funding sources (e.g. KKT fund, Priority Habitats Programme) all have criteria that help identify the most significant sites to direct funds and work towards.

The eligibility of sites for the Priority Habitats Programme is determined by the biodiversity values of the site and the work that needs to be completed in order to improve ecosystem functioning. A committee uses ecological assessments and other regional information to select sites for the programme and determines the most effective use of funds to provide the greatest biodiversity gains. Priority is given to wetland ecosystem types that are underrepresented in the programme, with the ultimate goal being to manage a representative range of all rare or threatened ecosystem types, including wetland types, in the region[42].

Have wetland owners been provided with advice and financial/project management assistance to carry out enhancement and protection measures including fencing, planting, and pest (plant and animal) control? Did the Regional Council seek funding from third parties to assist with this method, and encourage the establishment of covenants?

Yes, non-financial assistance has included:

- Site visits and advice
- Ecological assessments and site summary covering the significant flora and fauna present, the main threats, and any management recommendations
- Advice on how to apply for KKT grant and/or freshwater riparian planting grant

Financial assistance has been provided through grants, for:

- Fencing
- Weed control programmes
- Animal pest control programmes
- Supply of plants and labour for restoration/revegetation plantings[43]

Information on recent funding recipients (including the amount of funding granted) is available on Horizons' website.[44]

On ad-hoc occasions, landowners have been encouraged to apply for funding (to assist with this method) from QEII, Ducks Unlimited, and Fish and Game[45].

Staff recommend the establishment of covenants through QEII and Ngā Whenua Rāhui trusts where appropriate, and work closely with both of these organisations[46]. It is standard practice for staff to encourage covenants when working with landowners to protect and enhance sites[47].

Was monitoring of the effectiveness of the protection and enhancement works undertaken?

A report called 'The state and ecological condition of wetlands in the Horizons Region' was written in 2017. It used data from 74 wetlands that were surveyed over the study period, between 2015 and 2017. It found that there has been a general trend of improvement for fully HRC managed

[42] Source: L Cook, personal communication, March 2024.
[43] Source: L Cook, personal communication, March 2024.
[44] Source: https://www.horizons.govt.nz/about-our-region-and-council/grants-and-sponsorship/biodiversity-grants
[45] Source: C Davey and R Fleeson, personal communication, 12 March 2024.
[46] Source: L Cook, personal communication, March 2024.
[47] Source: C Davey and R Fleeson, personal communication, 12 March 2024.

sites, whereas the partially managed sites' scores were generally maintained across the scoring indices. This maintenance or improvement across the scores is more pronounced than the changes that have occurred in the unmanaged sites, where a few sites were seen to have declined. The results concluded that the wetland management regimes undertaken by Horizons were effective, for those sites, at meeting the One Plan objectives to halt the further decline of our region's indigenous biodiversity.[48] [49]

The above report notes that some unmanaged sites were seen to have declined. Most wetlands in the region are unmanaged, so it is possible that many of these have also declined.

Note: A 2015 review of the Top 100 wetlands project (by Nicholas Singers Ecological Solutions) suggested improvements to the method to determine the ecological condition of a wetland. The report found that the policy performance measure doesn't specify what "protect and enhance" means in terms of ecological condition, and suggested it should be amended to: What area and diversity of priority wetland habitat types are being sustainable protected or enhanced to a healthy and functional state?[50]

The Section 35: Freshwater Report provides further information on the quality and extent of the region's known and monitored wetlands[51].

Staff also undertake Rapid Ecological Assessments at wetland sites being managed under the Priority Habitats programme[52]. These are five-yearly assessments where staff revisit sites where work has been undertaken to assess ecological conditions. This includes collecting information on vegetation structure and diversity, regeneration, the presence of native fauna, the presence and abundance of pest plants and animals, and threats to the site[53]. The focus of these is to monitor native vegetation over time. Very limited analysis or reporting has been undertaken to identify trends. Information that is collected during the Rapid Ecological Assessments is recorded in our biodiversity database. The data shows that deer presence (and subsequent damage) in our managed sites has risen steadily over the last 10 years. Now around 50% of managed sites are impacted by introduced ungulates (deer, goats and pigs)[54].

Has the regional council undertaken publicity to increase public awareness about the importance of wetlands and indigenous biological diversity?

Council's Biodiversity Team and Communications Team promotes and educates the public on the ecological importance of wetlands and biodiversity in our region. Their work also extends to areas such as management of our icon sites (Bushy Park, Manawatū estuary, Pukaha, Te Apiti, Kia Wharite) and Totara Reserve[55]. Methods include:

- Social media posts on World Wetlands Day, and other social posts relating to the work we do around wetland restoration as and when it arises.
- Kanorau Koiora Taketake - Indigenous Biodiversity Community grants (KKT) projects which have a wetland focus are showcased on social media as and when they arise.
- Signage at publicly accessible wetlands and at the gorge[56].
- Interactive games at Enviroschools events.
- On occasions, wetlands and indigenous biological diversity has been a focus at events such as Rural Games, Fielddays and Totara Reserve Open Days.

[48] Source: \\file\herman\E\BM\01\02\Archive\Retain\Wetland Inventory and Monitoring\2016-2017 Wetlands project\Current State of Wetlands final.pdf
[49] Source: L Cook, personal communication, March 2024.
[50] Source: \\file\herman\E\BM\01\02\Archive\Retain\Wetland Inventory and Monitoring\Top 100 Wetlands project
[51] Source: Section 35 Freshwater, Section 10.3.
[52] These started around 2006. If we include earlier versions of REAs (i.e. ecological assessments of some form), these go back in our database to 2002/03. Ecological assessments exist for 375 wetlands. Source: R Fleeson and L Cook, personal communication, September 2024.
[53] Source: C Davey and R Fleeson, personal communication, 12 March 2024.
[54] Source: L Cook, personal communication, July 2024
[55] Source: L Cook, personal communication, March 2024.
[56] Source: S Williams, C Davey and R Fleeson, personal communication, March 2024.

Were the top 100 wetlands in the Region being actively managed, including protection or enhancement measures within 10 years of the One Plan becoming operative?

No - Council's approach changed after the One Plan became operative.

Ecosystem type mapping was completed for the Horizons Region as per the Singers and Rogers ecosystem typology. Ecosystem types present in the region were then prioritised for management by comparing historic cover with current cover and the extent protected on public conservation land. From this process, a finalised list of ecosystem types was then produced, which led to the identification that several ecosystem types in our region were not under protection and that there was a limited range of ecosystem types represented in both the Top 200 bush remnants and Top 100 wetlands programmes. This led to a shift in focus from just protecting wetlands and bush remnants to protecting and managing a wider range of ecosystems. The top 100 wetland programme was then replaced with the Priority Habitats programme.

Note: More detailed commentary of changes over time to this programme was provided in a report to Council on 15 December 2021 (Section 16)[57]. It includes a summary which noted the following:

- The programme has been reviewed at several stages since its origins in 2007 with some reviews reducing resources and others leading to increases.
- There is an ongoing challenge with continued addition of sites reducing funding available for maintenance on a per site basis.
- Several reviews have resulted in sites that have been part of the programme, no longer being eligible for funding from the programme.
- New site selection criteria and processes for the programme have been introduced to work systematically to the new goal set by Council.

Additional historic issues, prior to the establishment of the Priority Habitats Programme, included:

- An issue with the "top 100 wetlands" target was in relation to being granted access to these sites. Some landowners of priority wetlands chose not to be involved, making the target unachievable[58].
- Prior to the establishment of the Priority Habitats Programme, Horizons would undertake protection work but not ongoing maintenance. Ongoing maintenance did not occur due to lack of resourcing[59].

The Priority Habitats programme aims to manage and restore a representative range of the rare or threatened ecosystem types in the Horizons region. There are 34 ecosystem types identified as a priority for protection. The Priority Habitats Programme currently manages 95 sites which contain 31 of the priority ecosystems as well as 7 other native ecosystem types. This includes bush remnant sites. Management for a site in the programme typically involves fencing, ongoing weed/animal pest control and an ecological survey[60] that is completed every five years to monitor any changes in the ecological condition of the site[61].

Summary and assessment of Method 6-1 effectiveness:

This method is being partially implemented.

The target for this method has not been achieved, partly due to changes in approach since the One Plan became operative (however, it is also noted that Method 6-1 and 6-2 envisages 300 sites

[57] Source: https://www.horizons.govt.nz/HRC/media/Media/Agenda-Reports/Horizons-Regional-Council-(2)/Regional-Council-Meeting-2021-15-12/21171%20Non%20Regulatory%20Programme%20Reserves.pdf
[58] Source: 2015 review of the Top 100 wetlands project (by Ecological Solutions Limited)
[59] This approach could be seen as 'one-off', as opposed to the 'active management' approach stated in the target for Method 6-1.
[60] Findings from the ecological survey are used to decide what management actions are needed, and this is fed into the management plans.
[61] Source: L Cook, personal communication, March 2024. Figures as at July 2024.

being managed, and the Priority Habitats Programme currently manages 95. This suggests that even if the programme was not changed, it is unlikely it would be achieved).

While the target has not been implemented as stated in the method, the alternative approach taken by Council contributes to the intent of the method, which is to work with landowners to protect and enhance priority wetlands.

The report mentioned above ('The state and ecological condition of wetlands in the Horizons Region') concluded that the wetland management regimes undertaken by Horizons were effective at halting the further decline of those sites receiving management. However, most wetlands in the region are unmanaged, so it is possible that many of these sites have declined.

Another reason this policy has been only partially implemented is that no formal, quantitative, strategic programme currently exists to monitor the effectiveness of the protection and enhancement works. Rapid Ecological Assessments provide some qualitative information on ecological condition at managed sites, but do not act as a comprehensive monitoring programme.

Future considerations:

1. During a future plan change, the "...top 100 wetlands..." target will need to be revisited, due to dis-alignment with approaches currently being undertaken.

2. Further consideration should be given to the (Nicholas Singers Ecological Solutions) suggestion that the "protect and enhance" wording within this method should be amended to specify what this means in terms of ecological condition.

3. Horizons has limited resourcing to combat the challenges around protecting and enhancing wetlands. Working with landowners remains an important mechanism to combat the loss of wetlands, including due to activities such as drainage associated with farming, roading and development.

4. Establish and resource a strategic wetland monitoring programme to monitor effectiveness of protection and enhancement works.

5.1.2.2 Method 6-2 Bush Remnants - Biodiversity

Method	Target
The Regional Council and other agencies will work with landowners to protect and enhance priority bush remnants throughout the Region. Resources will be directed towards the most significant *sites**. Bush remnant owners will be provided with advice and financial/project management assistance to carry out enhancement and protection measures including fencing, planting, and pest (plant and animal) control. The Regional Council will seek funding from third parties to assist with this method, and encourage the establishment of covenants. Monitoring of the effectiveness of the protection and enhancement works will be undertaken. This method will include publicity to increase public awareness about the importance of bush remnants and indigenous biological diversity.	The top 200 bush remnants in the Region are being actively managed, including protection or enhancement measures, within 10 years of this Plan becoming operative.

What are the 'priority' bush remnants in the region? Has the Regional Council and other agencies worked with landowners to protect and enhance priority bush remnants throughout the Region? Were resources directed towards the most significant sites?

Priority bush remnants are defined first by Schedule F of the One Plan, whereby threatened, at risk and rare forest types are protected by rules and regulations.

Note: As above, ecosystem type mapping was completed for the Horizons region as per the Singers and Rogers ecosystem typology. Ecosystem types present in the region were then prioritised for management by comparing historic cover with current cover and the extent protected on public conservation land. From this process, a finalised list of ecosystem types was then produced, which led to the identification that several ecosystem types in our region were not under protection, i.e. that there was a limited range of ecosystem types represented in both the Top 200 bush remnants and Top 100 wetlands programmes. This led to a shift in focus from just protecting wetlands and bush remnants to protecting and managing a range of ecosystems.

Since the One Plan became operative, the top 200 bush remnants programme has been replaced with the Priority Habitats Programme. The reasons for this have been outlined above (See Method 6-1). Council manages priority bush remnants as part of the Priority Habitats Programme.

The Biodiversity team works with landowners to carry out ecological surveys to assess the forest composition and structure, provide information on the threats to bush health (e.g. pest plants and animals) and suggest potential methods to help improve forest integrity (e.g. stock exclusion, deer fencing, restoration planting etc.). If the site is accepted into the Priority Habitats Programme, the site will receive funding for activities such as fencing, animal pest control, weed control and planting.

The Land Team have also worked with landowners to protect bush blocks (through stock exclusion) for the Sustainable Land Use Initiative (SLUI) programme. Council also helps landowners protect and enhance bush remnants through the Kanorau Koiora Taketake - Indigenous Biodiversity Community grants fund.

In all cases, an effort is made to direct resources towards the most significant sites (the comments provided earlier in this report in relation to wetlands (see Method 6-1) also apply here).

Have bush remnant owners been provided with advice and financial/project management assistance to carry out enhancement and protection measures including fencing, planting, and pest (plant and animal) control? Did the Regional Council seek funding from third parties to assist with this method, and encourage the establishment of covenants?

Yes. The comments provided earlier in this report in relation to wetlands (see Method 6-1) also apply here.[62] Horizons has a grants policy in relation to fencing. In certain instances Council will fund up to 100% of fencing, pest plants and site specific animal control costs.

Encouraging the establishment of covenants is part of standard processes for staff, when meeting with landowners and discussing methods for protecting biodiversity sites[63].

Was monitoring of the effectiveness of the protection and enhancement works undertaken?

As mentioned above for wetlands, staff undertake Rapid Ecological Assessments at forest sites being managed under the Priority Habitats programme. These are five-yearly assessments where

[62] Source: L Cook, personal communication, March 2024.
[63] Source: C Davey and R Fleeson, personal communication, 12 March 2024.

staff revisit sites where work has been undertaken to assess ecological conditions. This includes collecting information on vegetation structure and diversity, regeneration, the presence of native fauna, the presence and abundance of pest plants and animals, and threats to the site.

Photopoints is a method Horizons staff have used for monitoring effectiveness. This involves the use of baseline photos, followed by further series of photos at later dates, which document ecological restoration and management outcomes[64]. This is an easy approach to monitoring that shows a visual representation of results. However, no analysis or reporting has been undertaken to identify trends, and Photopoints have limited scientific value[65].

Aside from photopoints, there have been limited attempts at monitoring and these have not resulted in any reports being produced. This is partly due to a lack of resourcing, but also due to a lack of methods to use that are nationally consistent, cost effective and able to be used in small forest fragments.[66] Challenges with establishing monitoring programmes have included[67]:

- There is no easy way to monitor the effectiveness of pest plant control (i.e. no easy way to show that pest plant cover has reduced over time as a result of control that takes into account the physical effort expended or the money spent).
- There's also no easy way to monitor the effectiveness of stock exclusion. The nationally recommended methods for monitoring forest health are very resource intensive (expensive and time consuming) and also require a large number of samples to get useful data. A lot of our managed sites are too small to contain the required number of samples. Council would benefit from less intensive, nationally accepted methods to use, and these are currently under development by Manaaki Whenua.
- For monitoring bird and pest numbers, there are methods available but many sites are too small to set up the required amount of samples.
- There has been no specific budget for monitoring - to pay contractors to set it up and carry it out. For bird monitoring this would require a contractor with specialist bird skills, or a specialist botanist for vegetation monitoring. However, this issue is secondary to the issue of a lack of suitable methods.
- Intensive national monitoring methods are costly, and if utilised, could result in less budget for operational activities.

Has the regional council undertaken publicity to increase public awareness about the importance of bush remnants and indigenous biological diversity?

Council's Biodiversity Team and Communications Team promote and educate the public on the ecological importance of biodiversity in our region. Their work also extends to areas such as management of our icon sites (Bushy Park, Manawatū estuary, Pukaha, Te Apiti, Kia Wharite) and Totara Reserve[68]. Methods include:

- Social media posts on biodiversity, relating to the work we do in this space.
- Enviroschools.
- Kanorau Koiora Taketake - Indigenous Biodiversity Community grants (KKT) projects which have a bush restoration focus are showcased on social media as and when they arise.
- Signage at publicly accessible biodiversity sites.
- Biodiversity themed community events. Recent examples have included:
    - a Conservation week themed event in Palmerston North with other partners DOC, Central Energy Trusts' Wil base Recovery Centre, and Rangitane,

[64] Source: C Davey and R Fleeson, personal communication, 12 March 2024.
[65] Note: The photopoints are not considered a scientific monitoring method. No empirical or quantitative data is generated from them and they have limited ability for inference. For example, if an image from a photopoints changes over time, there is no way to say what has caused those changes.
[66] Source: L Cook, personal communication, March 2024.
[67] Source: L Cook, personal communication, July 2024.
[68] Source: L Cook, personal communication, March 2024.

- a Totara Reserve Open day where we showcases pest animals, pest plants, freshwater,
- Totara Reserve night walk,
- Waimarino A&P show which had a focus on pest animals and pest plants where the public could learn about what we do and make connections with staff to support pest control on their own land[69].

Were the top 200 bush remnants in the Region being actively managed, including protection or enhancement measures, within 10 years of the One Plan becoming operative?

No - Council's approach changed after the One Plan became operative.

The comments provided earlier in this report in relation to wetlands (see Method 6-1) also apply here.

Summary and assessment of Method 6-2 effectiveness:

This method is being partially implemented.

The target for this method has not been achieved, partly due to changes in approach since the One Plan became operative. However it is noted that Method 6-1 and 6-2 envisages 300 sites being managed, and the Priority Habitats Programme currently manages 95. This suggests that even if the programme was not changed, it is unlikely it would be achieved.

Council has been partially implementing this method through the Priority Habitats Programme. However, there is insufficient data available to comment on the effectiveness of this method. Challenges have been identified with establishing appropriate methods for monitoring effectiveness.

Future considerations:

1. During a future plan change, the "...top 200 bush remnants..." target will need to be revisited, due to dis-alignment with current approaches.

2. Work further with agencies such as Manaaki Whenua to establish less intensive, nationally accepted methods to monitor the effectiveness of protection and enhancement works in forested ecosystems.

5.1.2.3 Method 6-3 Sites of Significance - Aquatic

Method	Target
The Regional Council and other agencies will work with landowners to protect and enhance water bodies and parts of water bodies that serve an important role in the lifecycle of the Region's rare and threatened native fish. Resources will be directed towards the most significant *sites**. Owners of land adjacent to water bodies will be provided advice and financial/project management assistance to carry out enhancement and protection measures including fencing, planting, replacement of perched	The top 100 Sites of Significance - Aquatic are actively managed, including protection or enhancement measures, within

[69] Source: L Cook, S Williams, C Davey and R Fleeson, personal communication, March 2024.

culverts and pest (plant and animal) control. The Regional Council will seek funding from third parties to assist with this method. Monitoring of the effectiveness of the protection and enhancement works will be undertaken. This method will include publicity to increase public awareness about the importance of native fish and indigenous biological diversity.	10 years of this Plan becoming operative.

Note: Method 6-3 was addressed from a water quality perspective in the freshwater evaluation. The assessment below adds to the findings of that evaluation by considering the method to a deeper extent.

Has the regional council (with other agencies) worked with landowners to protect and enhance water bodies and parts of water bodies that serve an important role in the lifecycle of the Region's rare and threatened native fish?

Horizons Regional Council has for several decades, through Land, Biodiversity and Freshwater teams, offered monetary grants to enhance the region's waterways, improving habitat for freshwater fish.

The Freshwater Team has worked with landowners since its evolution from the Land Team in 2011, and contributes funding to stream and wetland fencing, riparian planting and fish barrier remediation. Encouraging stock exclusion reduces disturbance to waterways and alongside riparian planting, improves water quality, benefiting native fish. During the last 13 years, large areas of waterway where freshwater fish were excluded have been re-opened by the remediation of in-stream structures to allow fish passage.

In addition, the Land Team implements the Sustainable Land Use Initiative (SLUI) program which targets controlling erosion, reducing sedimentation of waterways.

In 2011, the Manawatū River Leaders' Accord was launched, which includes representation from Horizons[70]. This project aims to improve the state of the Manawatū River and catchment by connecting people to the awa.

In 2020, the Jobs for Nature funding from the Ministry for the Environment boosted the existing riparian and fish passage programmes. This allowed for the establishment of the Fish Passage Team and additional capacity (financially and staff numbers) to carry out projects that would otherwise have not been achievable in the short amount of time. This funding is available until June 2025.

In 2023, Horizons Regional Council launched the regional freshwater community grant; a region-wide contestable fund of $100,000. This community grant, which has been co-funded previously through central government and under various names, supported a range of projects that benefited freshwater environments and/or provided education opportunities.

There is also a Horowhenua Water Quality Improvement service, benefiting residents within the Lake Horowhenua catchment area (involving a targeted rate).

In addition to working with landowners and providing monetary enticement to achieve environmental outcomes, Horizons Regional Council contributes towards the protection and enhancement of waterbodies through implementation of the One Plan's rules[71].

[70] Source: https://www.manawaturiver.co.nz/activities/freshwater-improvement-fund-2/
[71] Source: L Hickey, personal communication, 11 March 2024., and C Bond, personal communication, 11 July 2024.

Are resources being directed towards the most significant sites*?

Horizons Regional Council resources, including the fish passage, fencing and planting and SLUI grants, are not specifically targeted towards enhancing the region's most significant waterways (sites of significance – aquatic). Instead, they take a more general approach and aim to protect and enhance all of the region's waterways. This ensures widespread implementation of protection measures, with enhancement carried out in a variety of waterways with a diversity of habitat types.

The following is also noted:

- The SOS-A sites were identified based on the presence of indicator species however, the list of sites where these indicator species are found has not been updated since the plan became operative. Since 2014, many previously unmonitored sites have been surveyed and, rare and threatened species or high value fish communities have been found in many non-SOS-A waterways. Therefore, the SOS-A sites do not fully represent the important waterways in the region.
- The non-regulatory programs we have are voluntary and rely on landowner contribution or permission, regardless of SOS-A status. Therefore at least some aspect of the management of SOS-A sites are out of our hands[72].

Have owners of land adjacent to water bodies been provided with advice and financial/project management assistance to carry out enhancement and protection measures including fencing, planting, replacement of perched culverts and pest (plant and animal) control? Has the Regional Council sought funding from third parties to assist with this method?

In addition to the fish passage, riparian fencing and planting and SLUI programmes mentioned above, Horizons Regional Council provides pest plant and animal control throughout the region, including on land adjacent to water bodies. Pest animal and plant control is implemented as per the Regional Pest Management Plan 2017-2037[73].

Several of the previously mentioned projects utilise third party funding. Both the Fish Passage Team and the riparian planting and stream fencing projects are partially funded by central government Jobs for Nature funding until June 2025.

Information sheets have been created for activities in beds of rivers and lakes. These have been an important tool for land owner and public awareness[74].

A Manawatū River Leaders' Accord contestable grant was funded by Horizons, Manawatū District Council and the Ministry for the Environment combined, but this is no longer running[75].

Has monitoring of the effectiveness of the protection and enhancement works been undertaken?

Freshwater ecosystems are highly dynamic with many factors influencing instream characteristics. Therefore, monitoring the impact of enhancement actions with any degree of certainty is difficult and requires a lot of time and resources, resulting in specific monitoring of the success of enhancement works being limited. In saying this, many studies sit behind the enhancement options implemented. For example, the benefits of riparian stream fencing and planting are well documented in the literature and therefore, specific site studies are not necessarily required to be

[72] Source: Laura Hickey, via email, 11 March 2024.
[73] Source: https://www.horizons.govt.nz/HRC/media/Media/Pests/2017-2037-Regional-Pest-Management-Plan.pdf
[74] Source: https://www.horizons.govt.nz/publications-feedback/one-plan-supporting-documents/one-plan-factsheets
[75] Source: L Hickey, personal communication, 11 March 2024.

confident of the results. State of the environment monitoring is carried out which will reflect the cumulative effect of all of the enhancement actions as well as other influences.

While the benefits of remediating fish passage barriers are also well documented, it is slightly easier to measure and demonstrate this through monitoring. The Fish Passage Team has carried out a BACI (before-after-control-impact) survey to investigate the impact of a culvert remediation on the freshwater fish community at a handful of sites (however, they cannot form a complete picture of the effectiveness of culvert remediation as there are so many variables between the sites) [76].

What publicity to increase public awareness about the importance of native fish and indigenous biological diversity has occurred?

Community engagement to improve public knowledge of native fish and other freshwater fauna has been carried out via various avenues. These include[77]:

- Fish surveys and remediation presentations at catchment care group meetings,
- Native fish tank and interactive games at Enviroschools events,
- Q&A and display beside the native fish tank at Te Manawa,
- On occasions, native fish information has been a focus at events such as Rural Games and Fielddays,
- Staff featured in a documentary (The Turning Point - episode 5) that had a focus on freshwater fish,
- Media releases and social media (e.g. Facebook):
    - Social media accounts post regularly on aquatic issues relating to the work we do in this space as and when it arises.
    - Staff have showcased on our Manawatū River Facebook & Instagram page all the different native fish species in depth.
    - Grants such as the regional freshwater community grant and the Kanorau Koiora Taketake - Indigenous Biodiversity Community grants (KKT) projects which have freshwater themed focus are showcased on social media.

Has the Regional Council achieved the target (The top 100 Sites of Significance - Aquatic are actively managed, including protection or enhancement measures, within 10 years of this Plan becoming operative)?

This target has not been achieved in the sense that these sites are not actively managed. However, as stated above, these sites have more than likely benefited from the more general enhancement projects (fish passage, riparian stream fencing and planting, SLUI etc.). In addition, these sites are afforded extra protection measures by the regional plan provisions.

It is noted that Council carries out State of the Environment monitoring across the region, to gather data on the state and trends of our freshwater environments and communities. Our monitoring networks include water quality, periphyton, macroinvertebrate and freshwater fish monitoring. These datasets provide insight into the state and long-term trends of these parameters. There is a policy effectiveness component to this monitoring however, it must be noted that state and trend are impacted by both regulatory policy and non-regulatory implementation, as well as other factors such as weather patterns. Therefore, while the key drivers of these parameters can be identified and the effect of these drivers can be observed in the results of the monitoring network, the effect of individual policies or drivers cannot be quantified[78].

[76] Source: L Hickey, personal communication, 11 March 2024.
[77] Source: S Williams and L Hickey, personal communication, March 2024.
[78] Source: L Hickey, personal communication, 11 March 2024.

Summary of Method 6-3 effectiveness:

Method 6-3 is partially being implemented by Council through a variety of methods, including community grants. Despite limited monitoring, there can be confidence that the enhancement works have been effective - the benefits of riparian stream fencing and planting are well documented in literature.

Future Considerations:

1. During a future plan change, the "...top 100 Sites of Significance – Aquatic..." target will need to be revisited.

2. Consider the merits of a change of focus to direct resources towards 'Sites of Significance-Aquatic', or re-word the provision to reflect actual approach.

5.1.2.4 Method 6-4 Inanga Spawning and Native Fishery Sites - Biodiversity

Method	Target
The Regional Council and other agencies will work with landowners to protect and enhance water bodies and parts of water bodies (wetlands and streams) that serve an important role in the lifecycle of the inanga and whitebait* species. Resources will be directed towards the most significant sites*. Owners of land adjacent to water bodies will be provided advice and financial/project management assistance to carry out enhancement and protection measures including fencing, planting, replacement of perched culverts and pest (plant and animal) control. The Regional Council will seek funding from third parties to assist with this method. Monitoring of the effectiveness of the protection and enhancement works will be undertaken. This method will include publicity to increase public awareness about the importance of native fish and indigenous biological diversity.	The top 30 inanga spawning and native fishery sites* are actively managed, including protection or enhancement measures, within 10 years of this Plan becoming operative.

Note: Method 6-4 was addressed from a water quality perspective in the freshwater evaluation. The assessment below adds to the findings of that evaluation by considering the method to a deeper extent.

How is the Regional Council (with other agencies) working with landowners to protect and enhance water bodies and parts of water bodies (wetlands and streams) that serve an important role in the lifecycle of the inanga and whitebait* species?

The galaxiid whitebait species are unique as they utilise stream margins and low gradient riparian banks for spawning. The riparian stream fencing and planting program (mentioned above – see Method 6-3) has likely benefited these species by improving both instream and spawning habitats. Waterways important for īnanga spawning are identified in the Schedule 2 site specific values, and provisions exist in the One Plan to protect this spawning habitat.

Fish passage improvements have likely been significant for the whitebait species, all of which are migratory. Īnanga are weak swimmers and (unlike the other whitebait species) lack the ability to climb. These characteristics leave īnanga extremely vulnerable to instream structures preventing their migration, making the remediation of fish passage barriers significant for this species. River

reaches important for whitebait migration are identified in the Schedule 2 site specific values of the One Plan[79].

It is common practice to place consent conditions on Beds of Rivers and Lakes consents restricting works during inanga spawning. This is also a general condition in Chapter 17 (RP-LF-Land and Freshwater, table 15) for permitted and controlled activities. This also applies to whitebait migration[80].

Have resources been directed towards the most significant sites*?

Horizons Regional Council resources, including the fish passage, fencing and planting and SLUI grants, are not specifically targeted towards enhancing the region's most significant sites for inanga/native fish spawning. Instead, they take a more general approach and aim to protect and enhance all of the region's waterways. This ensures widespread implementation of protection measures, with enhancement carried out in a variety of waterways with a diversity of habitat types.

It is also noted that there are reaches identified as having inanga spawning value in Schedule 2 of the One Plan. However, there are less than 30 sites listed and no work has been done to rank sites in terms of value[81].

Have owners of land adjacent to water bodies been provided advice and financial/project management assistance to carry out enhancement and protection measures including fencing, planting, replacement of perched culverts and pest (plant and animal) control? Has the Regional Council sought funding from third parties? Has monitoring of the effectiveness of the protection and enhancement works been undertaken? What publicity to increase public awareness about the importance of native fish and indigenous biological diversity has occurred?

Refer to the comments previously provided (in relation to Method 6-3).

Has the Regional Council achieved the target (the top 30 inanga spawning and native fishery sites* are actively managed, including protection or enhancement measures, within 10 years of this Plan becoming operative)?

This target has not been achieved in the sense that these sites are not actively managed. However, these sites have more than likely benefited from the more general enhancement projects (fish passage, riparian stream fencing and planting, SLUI etc.). In addition, these sites are afforded extra protection measures throughout the consenting and compliance processes by imposing consent conditions restricting works that impact these species in beds of rivers and lakes during spawning and migration times[82].

Summary and assessment of Method 6-4 effectiveness:

Method 6-4 is being partially implemented via Method 6-3. The approach for implementing Method 6-4 has not resulted in its target being achieved.

Future Considerations:

[79] Source: L Hickey, personal communication, 11 March 2024.
[80] Source: L Shirley, personal communication, July 2024.
[81] Source: L Hickey, personal communication, 11 March 2024.
[82] Source: L Hickey, personal communication, 11 March 2024.

1. During a future plan change, consider the merits of combining Method 6-3 and 6-4?

2. During a future plan change, the "...top 30 inanga spawning and native fishery sites..." target will need to be revisited.

3. Consider the merits of a change of focus to direct resources towards the most significant sites, or re-word the provision to reflect actual approach.

5.1.2.5 Method 6-5 Biodiversity (Terrestrial and Aquatic) Research, Monitoring and Reporting

Method	Target
The aim of this method is to develop an integrated research, monitoring and reporting programme that supports delivery and refinement of existing policies and methods, guides implementation planning, and allows implementation effectiveness to be assessed.	A research, monitoring and reporting programme that supports delivery and refinement of existing policies and methods, and guides and assesses implementation.

Has the Regional Council developed an integrated research, monitoring and reporting programme that supports delivery and refinement of existing policies and methods, guides implementation planning, and allows implementation effectiveness to be assessed?

This method has not been fully implemented. For terrestrial biodiversity this is due to a mix of limited resourcing, a lack of suitable methods to use, and a lack of information needed to inform design (e.g. before we can implement a wetland monitoring programme, we need to know where the wetlands are and what type of wetland system they are in order to design a representative, strategic monitoring programme)[83].

While this method has not been fully implemented, some work has occurred. It is noted that Horizons has prepared a 2019 State of the Environment Report, which contained a section on biodiversity initiatives being undertaken[84]. Council staff also provide regular reports to the Integrated Catchment Committee that provide updates on initiatives being undertaken.

Staff also produced monitoring dashboards for a period between 2016 and 2018, with reporting on implementation of One Plan methods[85].

It is also noted that establishing and resourcing an integrated research, monitoring and reporting programme in a region as large as Horizons' would be a challenging, time consuming and resource intensive task. In the past there wasn't enough knowledge nationally to allow implementation of such a programme; however, work has been going on to progress this goal and we're getting closer. For instance, over the last five or so years, council ecologists have been working with Crown Research Institutes and MfE to develop nationally consistent methods for monitoring and reporting on wetlands, forest remnants and dune land environments. Methods are now ready for wetlands and dunelands, and Horizons' Science Team is currently designing an implementation proposal for our region. For forest remnants, development of monitoring methods is still ongoing but expected to be finished by 2026[86].

[83] Source: L Cook, personal communication, July 2024.
[84] Source: https://www.horizons.govt.nz/HRC/media/Media/Publication/2019-State-of-the-Environment.pdf?ext=.pdf
[85] Source: https://www.horizons.govt.nz/publications-feedback/one-plan-supporting-documents/one-plan-implementation-monitoring
[86] As noted earlier in the report (see Method 6-3), many studies sit behind the options implemented. Where benefits of enhancement works are well documented in literature, specific site studies are not necessarily required to be confident of the results.

Summary and assessment of Method 6-5 effectiveness:

Method 6-5 has not been achieved. There are significant challenges related to requirements around resourcing, cost and suitable methods. Council is looking to address gaps by working with Crown Research Institutes and MfE to develop nationally consistent methods for monitoring and reporting.

Future Considerations:

Continue to work with Crown Research Institutes and MfE to develop nationally consistent methods for monitoring and reporting. Failure to achieve Method 6-5 creates challenges for assessing the effectiveness and efficiency of existing indigenous biodiversity provisions, and for identifying opportunities for refinement.

5.1.2.6 Method 6-6 Education in Schools – Biodiversity

Method	Target
The aim of this method is to raise awareness amongst the youth of the Region of the significance of indigenous biological diversity, the threats to it, and what they can do to protect/restore it. This will be achieved through various environmental education programmes/initiatives e.g. Green RIG, Enviroschools, Trees for Survival and Youth Environment Forum.	The Regional Council develops and delivers a biodiversity-related environmental education programme.

Has the Regional Council raised awareness amongst the youth of the Region of the significance of indigenous biological diversity, the threats to it, and what they can do to protect/restore it? Has the Regional Council undertaken environmental education programmes/initiatives?

Yes – Council has primarily implemented this through their enhanced environmental education provision, and to a lesser extent through the Enviroschools programme.[87]

The environmental education provision is broad and includes bush exploration around invertebrates, birds, fungi, native trees, pest animals and pest plants. Council has consistently exceeded Annual Plan targets[88], which shows the value and calibre of the programme. Schools contact staff with specific requirements, and in most cases staff make a bespoke programme for them.

There are 110 Enviroschools in our region[89] and the programme is financially supported by all territorial authorities in the region. They are supported by a team of seven facilitators with Horizons being the regional coordinators of the program. Enviroschools has been considered to be a successful method. This has been communicated by teachers (through ad hoc feedback). Our success is also based on repeat business from schools and teachers (especially when teachers move from one school to the next, as they tend to introduce us to a new school we haven't worked with before)[90].

In addition to the Enviroschools programme, Council also undertakes other ad hoc approaches that contribute to Method 6-6. For example:

[87] Source: C Davey and R Fleeson, personal communication, 12 March 2024.
[88] For example, the 2022/23 target was 77 Enviroschools and the actual result was 104, an increase from 96 in 2021-22.
[89] This includes schools in Waitomo, Stratford and Taupō Districts which are in our region. However, Marco School which is in Stratford District is looked after by the Taranaki Regional Council.
[90] Source S Williams, personal communication, 9 July 2024

- While Horizons does not have a set wetland programme to offer to schools, the Environmental Educators and the Freshwater Team provide ad hoc sessions to schools.
- Staff have supported education activities at Bushy Park Tarapuruhi and at Awahuri Forest Kitchener Park.

Note: Method 6-6 states that it will be achieved "through various environmental education programmes/initiatives e.g. Green RIG, Enviroschools, Trees for Survival and Youth Environment Forum". Of these four examples, Enviroschools is the only programme still operating. The other three initiatives were superseded by Enviroschools. Funding and resourcing has contributed to the changes in approaches. Objectives have remained the same but approaches have needed to adapt[91].

Summary and assessment of Method 6-6 effectiveness:

Method 6-6 has been achieved, due to the success of the Enviroschools programme. Awareness has been raised amongst the children and youth of the Region as the programme has grown.

Future considerations:

During a future plan change, remove references to education programmes/initiatives that have been disestablished. Apply a more general approach to enable flexibility as programmes change or new ones are added.

5.1.2.7 Method 6-7 District Planning – Natural Features, Landscapes, Historic Heritage and Indigenous Biological Diversity

Method	Target
The Regional Council will formally submit on resource consent applications received by Territorial Authorities for land use activities where there is potential for effects on outstanding natural features, landscapes or indigenous biological diversity. The Regional Council will formally seek changes to district plans if necessary to ensure provisions are in place to provide an appropriate level of protection to natural features, landscapes, historic heritage and indigenous biological diversity. The Regional Council will formally seek changes to district plans if necessary to ensure district plan rules requiring protection of significant indigenous vegetation and the significant habitats of indigenous fauna do not contradict rules on indigenous biodiversity in this Plan.	• Submissions completed on consent applications. • District plan changes sought if necessary after this Plan becomes operative.

Has the Regional Council formally submitted on resource consent applications received by Territorial Authorities for land use activities where there is potential for effects on indigenous biological diversity?

It is not common for Horizons to formally submit on resource consent applications. Instead, staff seek to provide relevant information and comments to land owners and Territorial Authorities. Horizons' District Advice Team have reviewed many resource consent applications and provided information and advice in relation to indigenous biodiversity. Staff share information that is held,

[91] Source: C Davey and R Fleeson, personal communication, 12 March 2024.

such as from LocalMaps, ArcMap and the One Plan. The District Advice Team seek input from other teams (e.g. Biodiversity, Science, Consents, Policy) when their expertise is required[92].

Has the Regional Council formally sought changes to district plans, if necessary, to ensure:

- **provisions are in place to provide an appropriate level of protection to indigenous biological diversity, and**
- **district plan rules requiring protection of significant indigenous vegetation and the significant habitats of indigenous fauna do not contradict rules on indigenous biodiversity in the One Plan?**

Horizons is actively engaged in district plan reviews and changes (by Territorial Authorities in the region), including by providing advice during the preparation phases (prior to public notification). Where necessary, Horizons also provides formal submissions on proposed district plan changes. When preparing submissions, staff consider whether:

- The proposal would create inconsistency with the One Plan,
- The proposal would create inconsistency with other higher level documents, and
- Concern exists that the proposal may not provide an appropriate level of protection.

The processes followed by the District Advice Team and the Policy Team (with the assistance of other departments e.g. Science and Biodiversity) allows concerns to be identified and responded to during the RMA Schedule One Plan change process.

Note: In relation to district plans giving effect to the One Plan, Horizons' staff have implemented this method using a reactionary approach (i.e. at such time that Territorial Authorities have undertaken relevant district plan reviews or plan changes). However, Horizons has also actively supported LTP or AP proposals to fund district plan review programmes with a view to progressing compliance with s75 (3) and (4) of the RMA[93].

Anecdotally, there is a belief that the approach taken to implementing this method has largely resulted in successful outcomes, and the relief Horizons has sought has generally been included in district plan changes[94].

Summary and assessment of Method 6-7 effectiveness:

Horizons staff are actively engaged with land owners and Territorial Authorities to seek outcomes in resource consents and district plan reviews/changes that achieve this method. This has included an emphasis on raising awareness prior to consent applications being lodged and plan changes being notified. Therefore this method has been implemented.

Anecdotally, there is a belief that the approach taken to implementing this method has largely resulted in successful outcomes.

Future Considerations:

1. It is noted there is no reference within Method 6-7 to notices of requirement (proposals for designations – see s168 (a) RMA). Notice of requirements provide another planning mechanism whereby the regional council may wish to formally submit. During a future plan change, consider the merits of including reference to notices of requirement.

[92] Source: S Carswell, S. Westcott and J. Mitchell, personal communication, March 2024.
[93] Source: P Tucker, personal communication, August 2024.
[94] Although it is noted that recently this has become more challenging because of the uncertainty around whether our approach could remain under the proposed NPS-IB. Outcomes might not have been exactly what we sought in a submission, but staff are careful to include "or similar and/or consequential relief" statements in submissions.

5.1.2.8 Method 6-9 Indigenous Biodiversity Advice and Information

Method	Target
The aim of this method is to provide landowners and other parties with an interest in biodiversity with advice and information about the state of biodiversity in the Region, information about the rules and methods contained within this Plan to manage indigenous biodiversity, and advice about how these methods and rules will be implemented. This includes providing guidance on the rules contained within this Plan so that they can be easily understood and used by landowners.	An education and advice programme that is freely available and allows those interested to understand and use the methods and rules provided for in this Plan.

Has the Regional Council produced and made the following available to the public:

- **advice and information about the state of biodiversity in the Region,**
- **information about the rules and methods contained within this Plan to manage indigenous biodiversity,**
- **advice about how these methods and rules will be implemented, and**
- **guidance on the rules contained within the One Plan.**

Indigenous biodiversity advice and information has been produced and made available to the public. This has occurred through a variety of methods, including[95]:

- Media releases and social media (e.g. Facebook).
- Horizons' website.
- State of environment reporting.
- District Advice services (including sharing of a 'General Considerations' document that includes a section on Indigenous Biodiversity & Natural Inland Wetlands)[96].
- Duty Planner services, providing information on resource consent queries.
- A dedicated email address for One Plan enquiries (including in relation to indigenous biodiversity). These enquiries are responded to by the Policy Team.
- Services provided by Horizons' Biodiversity Team, including sharing of educational booklets.
- Horizons' information sharing at community events such as Field Days and A&P shows.
- One Plan Information Sheets, Land Management Environmental Grants Sheets, Growing Poplars Factsheet, etc. – available from Horizons' website[97] [98].
- Horizons' quarterly newsletter – 'Across the Region'.

Advice and information has also been provided via face-to-face meetings and site visits by staff.

Summary and assessment of Method 6-9 effectiveness:

Method 6-9 is being implemented through a variety of methods.

[95] Source: S Williams, personal communication, March 2024.
[96] Source: S Carswell, personal communication, March 2024.
[97] Source: https://www.horizons.govt.nz/publications-feedback/one-plan-supporting-documents/one-plan-factsheets & https://www.horizons.govt.nz/managing-natural-resources/land
[98] Source: https://www.horizons.govt.nz/HRC/media/Media/One%20Plan%20Documents/20240617-Working-in-beds-of-rivers-and-lakes-v2.pdf?ext=.pdf

5.1.3 Effectiveness of Chapter 6 Anticipated Environmental Results

5.1.3.1 The extent of rare habitat*, threatened habitat* or at-risk habitat*

AER	AER Indicators	Data Source
Except for change because of natural processes, or change authorised by a resource consent, by 2017, the extent of *rare habitat**, *threatened habitat** or *at-risk habitat** is the same as (or better than) that estimated prior to this Plan becoming operative, and the number of *at-risk habitats** has not increased.	Extent of each habitat type compared to former extent Number of *rare habitats**, *threatened habitats** and *at-risk habitats** damaged by unauthorised activities	Landcare Research: Land Environments NZ Tool, EcoSat tool and Land Cover Database 2 tool Regional Council's incidents database

What is the extent and number of each habitat type compared to the former extent and number?

This information is not recorded because the extent of rare, threatened, and at-risk habitats has never been accurately mapped in our region.

The One Plan uses a predictive approach to managing activities affecting indigenous biodiversity habitat, by describing significant habitats (in Schedule F) and identifying them as rare, threatened or at-risk. Activities affecting those habitats are regulated, with a non-complying activity status for rare and threatened habitats and discretionary for at-risk. Activities adjacent (within 5, 10 or 50 metres) to some habitat types are also regulated.

Resource consent is needed for many activities that adversely affect any area of indigenous biodiversity or habitat that meets the criteria of at-risk, rare or threatened, or for certain discharge permits located within 50 m of a rare, threatened or at risk habitat.

The way Horizons manages the identification of rare, threatened and at-risk habitats is through the use of:

- Indicative modelling or desktop assessments, which are used to identify potential rare, threatened and at-risk habitats in the area of interest, and
- In the field assessments, which confirms the presence of a rare, threatened or at risk habitat based on the criteria listed[99].

While accurate mapping does not exist, information is held that shows indicative extents where there may be potential biodiversity sites. Horizons hold three types of information[100]:

a) A database of known sites of indigenous terrestrial biodiversity. These mostly but not all classify as Schedule F habitats.
b) A database holding all the information from all the ecological assessments that have been done over the years of wetlands, bush remnants etc.
c) A database of potential biodiversity sites which is based on the Land Cover Database and predictive modelling of ecosystem types.

These datasets do allow basic analysis of trends, for example:

5 years ago:	Today:

[99] Source: L Cook, personal communication, March 2024.
[100] Source: L Cook, personal communication, July 2024.

Of the mapped indigenous habitat (769,063ha), Horizons has some information on 480,254 ha or 62% of this (through external surveys, Horizons site assessments, Department of Conservation (DOC), Queen Elizabeth II National Trust and Ngā Whenua Rahui (NWR). The remaining 288,808 ha, or 38%, is predicted indigenous habitat on private land identified through modelling, which has yet to be confirmed through site assessment. Biodiversity area that is verified through assessments but unmanaged by Horizons is 84,899 ha, and managed area is 2,874 ha.	Of the mapped indigenous habitat (778,409ha), Horizons has some information on 491,710 ha or 62% of this (through external surveys, Horizons site assessments, Department of Conservation (DOC), Queen Elizabeth II National Trust and Ngā Whenua Rahui (NWR). The remaining 296,699 ha, or 38%, is predicted indigenous habitat on private land identified through modelling, which has yet to be confirmed through site assessment. Biodiversity area that is verified through assessments but unmanaged by Horizons is 91,856 ha, and managed area is 3,610 ha.

The above table shows that Horizons has added more indigenous habitat to its database, assessed about 6000 ha of that habitat since 2019 and increased the hectares under management.

How many changes have been authorised by a resource consent? What were the impacts on the habitat types?

This information is provided later in this report, when assessments are undertaken of the effectiveness of Rules 13-8 and 13-9 (Note: These assessments indicate that Rules 13-8 and 13-9 have been given appropriate weighting during consenting conditions, and these provisions are effective in triggering consent conditions to avoid, mitigate or remedy any effects on indigenous biodiversity of proposed works that are considered to be more than minor).

How many rare habitats*, threatened habitats* and at-risk habitats* have been damaged by unauthorised activities?

This information is not recorded[101]. This indicator cannot accurately be measured, because people who undertake unauthorised activities will generally do so unknowingly, or wish to ensure the regional council remains unaware of this.

Horizons has a Consents Monitoring Team. On occasions, they encounter instances of unauthorised activities relating to indigenous biodiversity. This team have provided records of nine instances whereby abatement notices have been issued, two instances whereby infringement notices have been issued, and two instances of prosecutions[102].

Year	Notice	Summary
2017	Abatement	Council gave notice that the following actions must cease: - undertaking land disturbance and vegetation clearance within 10m of a wetland identified in Schedule F of the One Plan - Disturbing the bed of a lake - The diversion of water
2018	Abatement	Council gave notice that the following actions must cease: - unauthorised large scale land disturbance, including earthworks (immediately adjacent to a Schedule F site)
2018	Abatement	Council gave notice that the following actions must occur:

[101] Source: L Cook, personal communication, March 2024.
[102] Source: P Kinaston and A Stacey-Matthews, personal communication, 11 July 2024.

		- stabilisation of unauthorised large scale land disturbance, including earthworks (immediately adjacent to a Schedule F site)
2020	Abatement	Council gave notice that the following actions must occur: - stabilisation of unauthorised land disturbance by the formation of a track in a Schedule F site
2021	Abatement	Council gave notice that the following actions must cease: - undertaking land disturbance including vegetation clearance in a Schedule F site
2022	Abatement	Council gave notice that the following actions must cease: - The unauthorised vegetation clearance and/or land disturbance of rare or threatened habitat as defined by Schedule F
2023	Abatement	Council gave notice that the following actions must occur: - Remove culverts installed under earthworks, and install replacement culvers in accordance with the National Environmental Standards – Freshwater Regulations 2020 and the One Plan (in a Schedule F wetland site).
2023	Abatement	Council gave notice that the following actions must cease: - Unauthorised vegetation clearance and/or land disturbance of a Schedule F habitat
2023	Abatement	Council gave notice that the following actions must cease: - The unauthorised harvesting of Radiata Pine within a Schedule F habitat
2022	Infringement	Vegetation clearance of a threatened habitat that contravened Rule 13-9 of the One Plan. The fee for the infringement was $300.
2023	Infringement	Unauthorised vegetation clearance, land disturbance activities and installation of unauthorised structures (culverts) within an area identified as a "Threatened Habitat Type" in Schedule F of the One Plan. The fee for the infringement was $300.
2019	Prosecution	The defendant pleaded guilty on one charge of breach of s 13(1)(e) Resource Management Act 1991 in that they drained the bed of a lake without resource consent. In the best possible interpretation there were some real adverse effects from the lowering of the lake level, the loss of fish and inundation of surrounding dunes (including inundation of vegetation and animal species), as well as other potential adverse effects identified by the ecologists. The defendant was sentenced to 80 hours' community work.
2023	Prosecution	The defendants accepted and acknowledged they undertook land disturbance actions that caused more than minimal harm to a wetland of international importance. Each dependant paid approximately $10,000 (being contributions to Coastal Restoration Trust of New Zealand, and to the Regional Council to cover expenses incurred by obtaining technical reports and legal costs). The defendants also agreed to attend four working bees to assist with weed control in sand dunes.

In one instance, the recipient of an infringement notice had previously received an abatement notice.

Through the 2024-34 Long-term Plan a number of new roles have been budgeted for within the Consents Monitoring Team. Increased resourcing will allow for increased monitoring, which may in turn increase instances whereby Council becomes aware of unauthorised activities.

Summary and assessment of AER effectiveness:

Systems have not been established to fully measure this AER.

The extent of rare, threatened, and at-risk habitats has never been accurately mapped in our region. While accurate mapping does not exist, datasets are held that shows indicative extents where there may be potential biodiversity sites. These datasets do allow basic analysis of trends - including that Horizons has added more indigenous habitat to its database, assessing about 6000 ha of that habitat since 2019 and increasing the hectares under management.

Furthermore, instances of unauthorised activities cannot accurately be measured. Horizons' Consents Monitoring Team have provided records of nine instances whereby abatement notices have been issued, two instances whereby infringement notices have been issued, and two instances of prosecutions.

Future Considerations:

1. During a future plan change, increase efforts to establish robust AERs and AER Indicators that are measureable, and whereby commitments are in place for long-term monitoring and resourcing. Some aspects of these indicators pose challenges (e.g. identifying the extent of changes that have occurred as a result of natural processes, identifying instances of unauthorised activities). In addition, the way this AER is worded (i.e. with carve outs) is not representative of what Objective 6-1 would look like if achieved (even if the AER was, in fact, measurable, it may not measure progress towards achievement of the objective).

2. The NPS-IB 2023 includes monitoring requirements for regional councils, which may also be suitable AER indicators for Objective 6-1.

3. The way this AER is currently worded could be considered confusing (where it states that "...the number of *at-risk habitats** has not increased"). I.e. having more *at-risk habitats** could be considered desirable, if these are sites that were previously not identified.

5.1.3.2 The Region's top 100 wetlands and top 200 bush remnants

AER	AER Indicators	Data Source
By 2017, the Region's top 100 wetlands and top 200 bush remnants will be in better condition than that measured prior to this Plan becoming operative.	Number of top 100 wetlands and top 200 bush remnants under proactive management Habitat condition measure(s) which, where possible, will be consistent with those used by the Department of Conservation	Regional Council's identification and assessment of significant indigenous aquatic, coastal and terrestrial habitat types Regional Council's progress reports on results of proactive management of top wetland and bush remnant habitats

How many of the top 100 wetlands and top 200 bush remnants under proactive management?

As discussed earlier in this report, Council has taken the approach of managing priority wetlands and bush remnants through the Priority Habitats Programme.

The number of wetlands and bush remnants under proactive management is shown in the below table[103].

Year	Wetlands	Bush Remnants	Coastal
Prior to the Plan becoming operative	Not recorded	Not recorded	Not recorded
2017	64	127	1
2024*	25	67	3

*Note: Council's approach to defining 'active management' has changed and that has led to fewer sites being classed as actively managed. Previously, resourcing challenges limited ability for follow-up work at numerous sites. A focus was placed on a fewer number of sites to ensure adequate resourcing for proper ongoing management (i.e. the number of sites where staff worked was reduced to a core number that they could manage on an ongoing basis, i.e. visit regularly, follow up on pest plant control and implement any other restoration work like planting or pest animal control).

Much of the remaining indigenous biodiversity in the region is in poor condition and health with ecosystem processes more often than not interrupted. This decline in indigenous biological diversity is one of the four most critical issues addressed through the One Plan. Preservation of the natural character of wetlands and the protection of areas of significant indigenous vegetation are matters of national importance. The One Plan approach has been to at least maintain, and enhance where appropriate, the current degree of natural character of wetlands and indigenous biodiversity by:

- Continuing to provide a regional policy on natural character to guide decision making.
- Protecting and managing indigenous biological diversity and important wetlands.
- Restoring and rehabilitating natural character where appropriate[104].

Are priority sites in better condition than prior to the One Plan becoming operative? Are habitat condition measures consistent with those used by the Department of Conservation?

It is not possible to compare the current condition to the condition prior to the One Plan becoming operative[105]. While condition reports are now being undertaken, very few existed prior to the plan becoming operative. Furthermore, the condition measures used have changed, which means accurate comparisons cannot be undertaken.

Condition measures are not consistent with those used by the Department of Conservation. The condition measures used by the Department of Conservation are very time and resource intensive, and require specialist skills. Resourcing and budget constraints have prevented this approach[106] [107].

[103] Source: L Cook, personal communication, March 2024.
[104] Source: Section 35 – Freshwater & RMA 1991.
[105] There was a study done in 2002, which was used as a baseline for another report created in 2015-17. However this was only for wetlands (and is not linked to Priority Sites). This is discussed in the freshwater evaluation.
[106] For wetlands Horizons used a method for monitoring condition that is widely used by regional councils (DOC sometimes use that method too). It is a suitable alternative to the time and resource intensive method that DOC use in their main national biodiversity monitoring programme. For forests, Horizons tried an alternative approach to DOC's recommended gold-standard method but it was not suitable or fit for purpose.
[107] Source: L Cook, personal communication, March 2024.

Summary and assessment of AER effectiveness:

The indicators for this AER have not been measured. As discussed earlier in this report, Council has taken the approach of managing priority wetlands and bush remnants through the Priority Sites Programme.

Future considerations:

1. During a future plan change, increase efforts to establish robust AERs and AER Indicators that are measureable, and whereby commitments are in place for long-term monitoring and resourcing.

2. During a future plan change, reconsider whether it is feasible to propose habitat condition measures which will be consistent with those used by the Department of Conservation. An alternative approach, or increased budgeting and resourcing, is likely to be required.

Note: AERs identify the outcomes expected as a result of implementing the policies and methods in the regional policy statement (i.e. what you might see if the objective is achieved). They link directly to plan monitoring and provide indicators to measure the effectiveness and success of the plan. Unmeasurable AERs restrict the ability to establish whether or not the objective has been achieved or the expected change has occurred.

5.1.4 Effectiveness of Policy 8-4

Policy 8-4: Appropriate use and development

Any use or development in the CMA must:

(a) have a functional necessity to be located in the CMA,

(b) facilitate restoration or rehabilitation of natural features where reasonably practicable, and

(c) avoid, as far as reasonably practicable, any adverse *effects*^ on the following important values:

(i) any characteristic listed in Table I.1 in Schedule I: Part B for each Protection Activity Management Area

(ii) elements and processes that contribute to the natural character and open space characteristics of the CMA

(iii) the landscape and seascape elements that contribute to the natural character of the CMA

(iv) areas of significant indigenous vegetation and significant habitats of indigenous fauna, and the maintenance of indigenous *biological diversity*^

(v) the intrinsic values of ecosystems

(vi) the natural integrity and functioning of physical processes (including recognition of *sea level rise**)

(vii) *historic heritage*^.

When avoidance is not reasonably practicable, the adverse *effects*^ must be remedied or mitigated.

Have any use or development in the CMA avoided, as far as reasonably practicable, any adverse effects^ on areas of significant indigenous vegetation and significant habitats of indigenous fauna, and the maintenance of indigenous biological diversity^? When avoidance is not reasonably practicable, have the adverse effects^ been remedied or mitigated?

Data obtained from Horizons' consents database, IRIS, indicates 1 individual consent that refers to Policy 8-4 has been granted since the plan became operative[108]. This was an application (by Horizons Regional Council) for a resource consent to redevelop the northern moles at the mouth of the Whanganui River, Whanganui. The Applicant engaged an ecologist to undertake an assessment of the project on the existing marine ecology along the northern mole, and consulted with the Department of Conservation. The effects on the aquatic ecology were considered to be less than minor.

Conditions included the preparation of a construction environment management plan (CEMP). The CEMP was required to include (among other things):

- Methods to minimise the effects on marine biota;
- Proposed methodology to minimise the effects on Kekeno (fur seals) and Korora (little blue penguins);
- a Spill Management Plan;
- a certified erosion and sediment control plan;

[108] Source: IRIS

Other conditions included:

- A survey of the stage to identify if there are any Kekeno (New Zealand Furseals) or Korora (Little Blue penguins) prior to any works commencing. If such birds are present, then a buffer must be established around the birds. The buffer distance and measures to minimise the effects on these birds must be developed in conjunction with the Department of Conservation.
- The Consent holder shall ensure the works are undertaken in a manner that minimises the impact on the existing marine biota.

Summary and assessment of Policy 8-4 effectiveness:

Seeing as IRIS indicates only 1 individual consent that refers to Policy 8-4; there is insufficient data to make a definitive assessment.

Future Considerations:

There is a lack of clarity around the relationship between One Plan Objective 6-1 and the Coastal Marine Area (in particular, Policy 8-4). There would be benefit in specifying if Objective 6-1 is intended to apply to the Coastal Marine Area.

If Objective 6-1 is intended to be a parent provision to Policy 8-4, there is a conflict between the wording that should be addressed (Objective 6-1 has a focus on protection and enhancement, whereas Policy 8-4 has a focus on avoidance as reasonably practicable).

5.1.5 Effectiveness of Chapter 13 rules

Objective 13-2 and Policies 13-3, 13-4, 13-5 are implemented through Rules 13-1 – 13-9.

Objective 13-2: Regulation of activities affecting indigenous *biological diversity*^

The regulation of resource use activities to protect areas of significant indigenous vegetation and significant habitats of indigenous fauna or to maintain indigenous *biological diversity*^, including enhancement where appropriate.

Policy 13-3: *Regional rules*^ for activities affecting indigenous *biological diversity*^

The Regional Council must require *resource consents*^ to be obtained for *vegetation clearance**, *land disturbance**, *cultivation**, *bores**, *discharges*^ of *contaminants*^ into or onto *land*^ or *water*^, taking, use, damming or diversion of *water*^ and activities in the *beds*^ of *rivers*^ or *lakes*^ within *rare habitats**, *threatened habitats** and *at-risk habitats**, and for *forestry** that does not minimise potential adverse *effects*^ on those habitats, through *regional rules*^ in accordance with Objectives 12-1, 12-2 and 13-2 and Policies 12-1 to 12-8.

Policy 13-4: Consent decision-making for activities in *rare habitats, *threatened habitats** and *at-risk habitats****

(a) For activities regulated under Rule 13-8 and 13-9, the Regional Council must make decisions on consent applications and set consent *conditions*^ on a case-by-case basis:

(i) For all activities, having regard to:

(A) the Regional Policy Statement, particularly Objective 6-1 and Policy 6-2,

(B) a *rare habitat** or *threatened habitat** is an area of significant indigenous vegetation or a significant habitat of indigenous fauna,

(C) the significance of the area of habitat, in terms of its representativeness, rarity and distinctiveness, and ecological context, as assessed under Policy 13-5,

(D) the potential adverse *effects*^ of the proposed activity on significance,

(E) for activities regulated under ss13, 14 and 15 RMA, the matters set out in Policy 13-2(k) and relevant objectives and policies in Chapters 5, 14, 16 and 17, and

(F) for activities involving a *discharge*^, the matters in Policy 14-9.

(ii) For electricity transmission and renewable energy generation activities, providing for any national, regional or local benefits arising from the proposed activity.

(b) Consent must generally not be granted for resource use activities in a *rare habitat**, *threatened habitat** or *at-risk habitat** assessed to be an area of significant indigenous vegetation or a significant habitat of indigenous fauna under Policy 13-5, unless:

(i) any more than minor adverse *effects*^ on that habitat's representativeness, rarity and distinctiveness, or ecological context assessed under Policy 13-5 are avoided.

(ii) where any more than minor adverse *effects*^ cannot reasonably be avoided, they are remedied or mitigated at the point where the adverse *effect*^ occurs.

(iii) where any more than minor adverse *effects*^ cannot reasonably be avoided, remedied or mitigated in accordance with (b)(i) and (ii), they are offset to result in a net indigenous *biological diversity*^ gain.

(c) Consent may be granted for resource use activities in an *at-risk habitat** assessed not to be an area of significant indigenous vegetation or a significant habitat of indigenous fauna under Policy 13-5 when:

(i) there will be no significant adverse *effects*^ on that habitat's representativeness, rarity and distinctiveness, or ecological context as assessed in accordance with Policy 13-5, or

(ii) any significant adverse *effects*^ are avoided.

(iii) where any significant adverse *effects*^ cannot reasonably be avoided, they are remedied or mitigated at the point where the adverse effect occurs.

(iv) where significant adverse *effects*^ cannot reasonably be avoided, remedied or mitigated in accordance with (c)(ii) and (iii), they are offset to result in a net indigenous *biological diversity*^ gain.

(d) An offset assessed in accordance with b(iii) or (c)(iv), must:

(i) provide for a net indigenous *biological diversity*^ gain within the same habitat type, or where that habitat is not an area of significant indigenous vegetation or a significant habitat of indigenous fauna, provide for that gain in a *rare habitat** or *threatened habitat** type, and

(ii) reasonably demonstrate that a net indigenous *biological diversity*^ gain has been achieved using methodology that is appropriate and commensurate to the scale and intensity of the residual adverse *effect*^, and

(iii) generally be in the same ecologically relevant locality as the affected habitat, and

(iv) not be allowed where inappropriate for the ecosystem or habitat type by reason of its rarity, vulnerability or irreplaceability, and

(v) have a significant likelihood of being achieved and maintained in the long term and preferably in perpetuity, and

(vi) achieve conservation outcomes above and beyond that which would have been achieved if the offset had not taken place.

Policy 13-5: Criteria for assessing the significance of, and the *effects*^ of activities on, an area of habitat

(a) *Rare habitats** are areas of significant indigenous vegetation or significant habitats of indigenous fauna under criterion (ii)(E) below. *Threatened habitats** are areas of significant indigenous vegetation or significant habitats of indigenous fauna under criterion (i)(A) below. An area of *rare habitat** or *threatened habitat** may also be an area of significant indigenous vegetation or significant habitat of indigenous fauna under one or more of the other criteria below. An *at-risk habitat** may be recognised as being an area of significant indigenous vegetation or a significant habitat of indigenous fauna if one or more of the following criteria are met:

(i) in terms of representativeness, that habitat:

(A) comprises indigenous habitat type that is under-represented (20% or less of known or likely former cover), or

(B) is an area of indigenous vegetation that is typical of the habitat type in terms of species composition, structure and diversity, or that is large relative to other areas of the same habitat type in the Ecological District or Ecological Region, or has functioning ecosystem processes.

or

(ii) in terms of rarity and distinctiveness, that habitat supports an indigenous species or community that:

(A) is classified as threatened (as determined by the *New Zealand Threat Classification System and Lists**), or

(B) is distinctive to the Region, or

(C) is at a natural distributional limit, or

(D) has a naturally disjunct distribution that defines a floristic gap, or

(E) was originally (ie., prehuman) uncommon within New Zealand, and supports an indigenous species or community of indigenous species.

or
(iii) in terms of ecological context, that habitat provides:
(A) connectivity (physical or process connections) between two or more areas of indigenous habitat, or
(B) an ecological buffer (provides protection) to an adjacent area of indigenous habitat (terrestrial or aquatic) that is ecologically significant, or
(C) part of an indigenous ecological sequence or connectivity between different habitat types across a gradient (eg., altitudinal or hydrological), or
(D) important breeding areas, seasonal food sources, or an important component of a migration path for indigenous species, or
(E) habitat for indigenous species that are dependent on large and contiguous habitats.
(b) The potential adverse *effects*^ of an activity on a *rare habitat**, *threatened habitat** or *at-risk habitat** must be determined by the degree to which the proposed activity will diminish any of the above characteristics of the habitat that make it significant, while also having regard to any additional ecological values and to the ecological sustainability of that habitat.

5.1.5.1 Rule 13-1 Small-scale land disturbance*

Rule	Activity	Classification	Conditions / Standards / Terms	Control / Discretion Non-Notification
13-1 Small-scale land disturbance*	Except as regulated by Rules 13-6, 13-8 and 13-9, any land disturbance* pursuant to s9(2) RMA of a total area up to 2500 m2 per property* per 12-month period and any ancillary: (a) diversion of water^ pursuant to s14(2) RMA on the land^ where the land disturbance* is undertaken, or (b) discharge^ of sediment into water^ pursuant to s15(1) RMA resulting from the land disturbance*.	Permitted	(a) The activity must not take place on land^ that is within a coastal foredune*. (b) Erosion and sediment control methods, which may include bunding, silt traps, interception drains or other alternative methods, to minimise sediment discharge^ to water^ must be installed prior to, and maintained during, the land disturbance* activity (c) Any ancillary discharge of sediment into water^ must not, after reasonable mixing, cause the receiving water body^ to breach the water quality standards for visual clarity set out in Schedule E for that water body^. (d) The activity must not occur on land^ that is in, or within 5 m of: (i) the bed^ of a river^ that is permanently flowing, (ii) the bed^ of a river^ that is not permanently flowing and has an active bed* width greater than 1 m, (iii) the bed^ of a lake^. (e) The activity must not occur on land^ that is in, or within 10 m of: (i) A wetland^ as identified in Schedule F, (ii) Sites valued for Trout Spawning as identified in Schedule B, (iii) Sites of Significance - Aquatic as identified in Schedule B.	

How has this provision been applied to resource consents?

In terms of monitoring consents and housing resource consent data, Horizons use a system called IRIS. However, Rule 13-1 is a permitted activity, which means resource consent is not required to undertake this activity (and therefore data is not entered in IRIS). As a result, limited data is available to monitor how effective permitted activities are.

Anecdotally, Horizon's Consenting Team Leaders have provided feedback that the Indigenous Biodiversity One Plan rules are working effectively, and that they provide an adequate level of teeth to achieve Indigenous Biodiversity objectives. One area for future consideration was identified however, in relation to edge effects in the buffer zones of One Plan Schedule F sites. For example, under the current rules, a forest block could potentially be planted in close proximity to a Schedule F site.[109] In such instances, forestry activities could have negative environmental impacts on these sites including increasing erosion, reducing water quality in streams, and disrupting animal and plant species.

It is also noted that the Section 35 Review – Freshwater identified that:

- "From a compliance perspective, the regulatory framework provided by Rules 13-1 to 13-7 is generally considered to provide a sound basis for monitoring and enforcing activities subject to the plan's permitted activity rules or resource consents.", and
- "The lack of systematic monitoring, raising questions about the level of compliance with permitted activity standards and some resource consents, was identified…".[110] [111]

Summary and assessment of Rule 13-1 effectiveness:

Limited data is available to monitor how effective permitted activities are. Anecdotally, feedback has been provided from Council's Regulatory Team that the Indigenous Biodiversity One Plan rules are working effectively.

Future Consideration:

In future plan changes, give further consideration to whether additional regulatory protection should apply to edge effects in the buffer zones of One Plan Schedule F sites.

[109] Source: S. Westcott and J. Mitchell, personal communication, 8 March 2024.
[110] Source: Section 35 Review – Freshwater
[111] Horizons has a Consents Monitoring Team. On occasions, they encounter instances of unauthorised activities. This team have provided records of 9 instances whereby abatement notices have been issued, 2 instances whereby infringement notices have been issued, and 2 instances of prosecutions. See Section 5.1.3.1 of this evaluation report for further details.

5.1.5.2 Rule 13-2 Large-scale land disturbance*, including earthworks

Rule	Activity	Classification	Conditions / Standards / Terms	Control / Discretion Non-Notification
13-2 Large-scale land disturbance*, including earthworks	Except as regulated by Rules 13-6, 13-8 and 13-9, any land disturbance* pursuant to s9(2) RMA of a total area greater than 2500 m2 per property* per 12-month period and any ancillary: (a) diversion of water^ pursuant to s14(2) RMA on the land^ where the land disturbance* is undertaken, or (b) discharge^ of sediment into water^ pursuant to s15(1) RMA resulting from the land disturbance*.	Controlled	(a) The activity must not take place on land^ that is within a coastal foredune*. (b) The activity must be undertaken in accordance with an Erosion and Sediment Control Plan*. (c) Any ancillary discharge^ of sediment into water^ must not, after reasonable mixing, cause the receiving water body^ to breach the water quality standards for visual clarity set out in Schedule E for that water body^. (d) The activity must not occur on land^ that is in, or within 5 m of: (i) the bed^ of a river^ that is permanently flowing, (ii) the bed^ of a river^ that is not permanently flowing and has an active bed* width greater than 1 m, (iii) the bed^ of a lake^. (e) The activity must not occur on land^ that is in, or within 10 m of: (i) A wetland^ as identified in Schedule F, (ii) Sites valued for Trout Spawning as identified in Schedule B, (iii) Sites of Significance - Aquatic as identified in Schedule B.	Control is reserved over: (a) the location, nature, scale, timing and duration of the activity (b) Additional content of and the standard to which the Erosion and Sediment Control Plan* must be prepared, the implementation of the plan, and the timing of when it must be prepared and submitted (c) the effects^ of the activity and associated sediment run-off on soil conservation, surface water* quality and aquatic ecology and the methods to be taken to avoid, remedy or mitigate them (d) the provision of greater setback distances from water bodies^ than those specified under conditions (d) and (e) to provide greater protection to a water body^ if required (e) duration of consent (f) review of consent conditions^ (g) compliance monitoring (h) the matters in Policy 14-9. Resource consent^ applications under this rule^ will not be notified and written approval of affected persons will not be required (notice of applications need not be served^ on affected persons). **Advice Note:** Examples of alternative methods to avoid, remedy or mitigate sediment run-off can be found in Chapters 3-9 of the "Erosion and Sediment Control Guidelines for the Wellington Region" (September 2002).

How has this provision been applied to resource consents?

Rule 13-2 is a controlled activity, which means resource consent is required to undertake this activity.

Data obtained from Horizons' consents database, IRIS, indicates 84 individual consents that refer to Rule 13-2 have been granted since the plan became operative[112]. Based on an assessment of a sample of these consents (10 consents), this provision appears to be being applied correctly in relation to significant indigenous biodiversity. In each of these consents, the land disturbance was not proposed to occur in, or within 10 metres of Schedule B or Schedule F sites.

In addition, the anecdotal evidence provided by staff in relation to Rule 13-1 also applies to this rule.

Summary and assessment of Rule 13-2 effectiveness:

Anecdotally, feedback has been provided from Council's Regulatory Team that the Indigenous Biodiversity One Plan rules are working effectively.

In addition, this provision appears to be being applied correctly to resource consent applications.

[112] Source: IRIS

5.1.5.3 Rule 13-3 Plantation forestry is regulated under the National Environmental Standards for Plantation Forestry (2017).

Rule	Activity	Classification	Conditions / Standards / Terms	Control / Discretion Non-Notification
13-3A **Non-plantation forestry*** Advice Note: Plantation forestry is not regulated under this Rule. Plantation forestry is regulated under the National Environmental Standards for Plantation Forestry (2017)	Except as regulated by Rule 13-8 and 13-9, any non-plantation forestry* pursuant to s9(2) RMA, and any ancillary: (a) disturbance of the bed^ of a river^ or lake^ pursuant to s13(1) RMA by non-plantation forestry*, or (b) diversion of water^ pursuant to s14(2) RMA on the land^ (but not within a river^) where the non-plantation forestry* is undertaken, or (c) discharge^ of sediment or slash* into water^ or onto or into land^ that may enter water^ pursuant to s15(1) or 15(2A) RMA resulting from the non-plantation forestry*.	Permitted	(a) The activity must not take place on land^ that is within a coastal foredune*. (b) Any earthworks, the formation of any new track* and any planting or replanting of forestry* trees must not occur on land^ that is in, or within 5 m of: (i) the bed^ of a river^ that is permanently flowing (ii) the bed^ of a lake^ (iii) a rare habitat*, threatened habitat* or at-risk habitat*. unless the new track* or earthworks in (b)(i) or (b)(ii) is: (A) necessary to connect to and from a formed river* crossing point that is a consented or permitted activity, and/or (B) for the purpose of the maintenance* or upgrade* of an existing track* or earthwork. (c) Any new planting of forestry* trees and associated formation of any new track* or earthworks must not occur on land* that is in, or within 10 m of wetland^ habitat types (including lakes^) as defined in Schedule F. (d) Any earthworks or the formation of any new track* must not occur on land^ that is in, or within 10 m of a reach of a river^ or its bed^ with a Schedule B Value of Trout Spawning or Trout Fishery, unless the new track* or earthworks is: (A) necessary to connect to and from a formed river* crossing point that is a consented or permitted activity, and/or (B) for the purpose of the maintenance* or upgrade* of an existing track* or earthwork. (e) If any rare habitat*, threatened habitat* or at-risk habitat* is present within 5 m of an area of forestry* prior to undertaking harvesting an Operational Plan*, detailing measures taken to avoid or mitigate adverse effects^ on these areas, must be prepared and submitted to the Regional Council at least 48 hours prior to harvesting commencing and the Operational Plan* must be complied with. (f) Any area of *non-plantation forestry** that is harvested (other than firebreaks, tracks*, landing sites* or areas in (a) and (b)) must be planted or replanted to protect from erosion as soon as practicable and no later than 18 months from the date of the harvesting, unless the area is left to revegetate naturally. (g) Water^ run-off controls must be installed and maintained for tracks* and landing sites*. (h) Batters, cuts and side castings must be established by methods that prevent slumping. (i) Felled vegetation must be felled away from and not be dragged through any water body^ other than where this is necessary to avoid endangering the health and safety of workers, or where it is unavoidable and is the best harvest method such as, but not limited to, hauling through corridors or butt extraction, and	

			(i) any discharge^ resulting from the activity must not, after reasonable mixing, breach the water quality standards for change in visual clarity identified for that water body^ set out in Schedule E, and (ii) the activity must not occur in a water body^ with a Trout Spawning Value identified in Schedule B during the trout spawning season (1 May to 30 September inclusive), and (iii) the activity must not occur in a water body^ greater than 5 m in width, and (iv) the activity must not occur in an area listed in (b) (iii). (j) Harvesting must be planned and carried out so as to minimise the amount of slash* discharging^ into any area listed in (b)(i) and (ii) and entering any area listed in (b)(iii). (k) Slash* must be removed from within areas listed in (b)(i) where it is blocking river^ flow, or is diverting river^ flow and causing bank erosion. (l) Slash* associated with landing sites* and processing sites* must be placed on stable ground and contained to prevent accumulated slash from causing erosion or land instability. (m) The use of mobile machinery in or on the bed^ of a river^ with a Schedule B Value of Trout Spawning in a manner that disturbs the bed^ of the active flowing channel must not take place during the trout spawning season (1 May to 30 September inclusive). (n) The use of mobile machinery in or on the bed^ of a river^ with a Schedule B Value of Whitebait Migration in a manner that disturbs the bed^ of the active flowing channel must not take place 15 August to 30 November (inclusive). (o) The activity must be undertaken in accordance with an Erosion and Sediment Control Plan* which must be submitted to the Regional Council upon request. (p) Any discharge^ resulting from the activity must not, after reasonable mixing, breach the water quality standards for change in visual clarity identified for that water body^ set out in Schedule E. (q) Regional Council must be notified at least 48 hours prior to the activity commencing.	
13-3B **Plantation forestry**	In addition to the regulations contained in the NES-PF, any plantation forestry*(including ancillary activities covered in the NES-PF) pursuant to s9(2) RMA, and any ancillary: (a) disturbance of the bed^ of a river^ or lake^ pursuant to s13(1) RMA by plantation forestry*, or	Permitted	(a) The activity (including afforestation, harvesting, earthworks or forestry quarrying, must not take place on land^ that is within a coastal foredune*. (b) Any earthworks and the formation of any new track* must not occur on land^ that is in, or within 5 m of a rare habitat*, threatened habitat* or at-risk habitat*. (c) Any new planting of forestry* trees and associated formation of any new track* or earthworks must not occur on land^ that is in, or within, 10 m of wetland^ habitat types (including lakes^) as defined in Schedule F (d) Felled vegetation must be felled away from not be dragged through a rare habitat*, threatened habitat* or at-risk habitat*. (e) Harvesting must be planned and carried out so as to minimise the amount of slash* entering any rare habitat*, threatened habitat* or at-risk habitat*.	

	(b) diversion of water^ pursuant to s14(2) RMA on the land^ (but not within a river^) where the plantation forestry* is undertaken, or (c) discharge^ of sediment or slash* into water^ or onto or into land^ that may enter water^ pursuant to s15(1) or 15(2A) RMA resulting from the plantation forestry*.		(f) Any discharge^ resulting from the activity (including planting, harvesting, earthworks and forestry* quarrying) must not, after reasonable mixing, breach the water^ quality standards for change in visual clarity identified for that water body^ set out in Schedule E. (g) If any rare habitat*, threatened habitat* or at-risk habitat* is present within 5 m of an area of plantation forestry* prior to undertaking harvesting an Operational Plan*, detailing measures taken to avoid or mitigate adverse effects^ on these areas, must be prepared and submitted to the Regional Council at least 48 hours prior to harvesting commencing and the Operational Plan* must be complied with. (h) The use of mobile machinery in or on the bed^ of a river^ with a Schedule B Value of Whitebait Migration in a manner that disturbs the bed^ of the active flowing channel must not take place during 15 August and 30 November (inclusive).	

How has this provision been applied to resource consents?

Rules 13-3A and 13-3B are permitted activities, which means resource consent is not required[113]. The comments and anecdotal evidence provided by staff in relation to Rule 13-1 also apply to this rule.

Summary and assessment of Rule 13-3 effectiveness:

The comments provided in relation to Rule 13-1 also apply to this rule.

[113] Rules 13-A & B were recently amended to better give effect to the NES-PF.

5.1.5.4 Rule 13-4 Cultivation*

Rule	Activity	Classification	Conditions / Standards / Terms	Control / Discretion Non-Notification
13-4 Cultivation*	Except as regulated by Rules 13-6, 13-8 and 13-9, any cultivation* and ancillary land disturbance* for the purposes of constructing erosion and sediment control methods to minimise sediment run-off into water^ pursuant to s9(2) RMA and any ancillary: (a) diversion of water^ pursuant to s14(2) RMA on the land^ where the cultivation* is undertaken, or (b) discharge^ of sediment into water^ pursuant to s15(1) RMA resulting from the cultivation* or the use of ancillary erosion and sediment control methods to minimise sediment run-off into water^.	Permitted	(a) The activity must not take place on land^ that is within a coastal foredune*. (b) Bunding, silt traps, interception drains or other alternative methods to minimise sediment run-off to water^ must be installed prior to and maintained during cultivation*. (c) Any ancillary discharge^ of sediment into water^ must not, after reasonable mixing, cause the receiving water body^ to breach the water quality standards for visual clarity set out in Schedule E for that water body^. (d) For vegetable crops listed within the Commodity Levies (Vegetables and Fruit) Order 2007 a paddock assessment must be undertaken in accordance with the Code of Practice for Commercial Vegetable Growing in the Horizons Region (Horticulture New Zealand) Version 2010/2. (e) The activity must not occur on land^ that is in, or within 5 m of: (i) the bed^ of a river^ that is permanently flowing, (ii) the bed^ of a river^ that is not permanently flowing and has an active bed* width greater than 1 m, (iii) the bed^ of a lake^. (f) The activity must not occur on land^ that is in, or within 10 m of: (i) A wetland^ as identified in Schedule F, (ii) Sites valued for Trout Spawning as identified in Schedule B, (iv) Sites of Significance - Aquatic as identified in Schedule B. Advice Note: Examples of alternative methods for minimising sediment run-off can be found in the Code of Practice for Commercial Vegetable Growing in the Horizons Region (Horticulture New Zealand).	

How has this provision been applied to resource consents?

Rule 13-4 is a permitted activity, which means resource consent is not required to undertake this activity. The comments and anecdotal evidence provided by staff in relation to Rule 13-1 also apply to this rule.

Summary and assessment of Rule 13-4 effectiveness:

The comments provided in relation to Rule 13-1 also apply to this rule.

5.1.5.5 Rule 13-5 Vegetation Clearance*

Rule	Activity	Classification	Conditions / Standards / Terms	Control / Discretion Non-Notification
13-5 Vegetation Clearance*	Except as regulated by Rules 13-6, 13-8 and 13-9, any vegetation clearance* pursuant to s9(2) RMA and any ancillary: (a) diversion of water^ pursuant to s14(2) RMA on the land^ where the vegetation clearance* is undertaken, (b) discharge^ of sediment into water^ pursuant to s15(1) RMA resulting from the vegetation clearance.	Permitted	(a) The activity must not take place on land^ that is within a coastal foredune*. (b) Any ancillary discharge^ of sediment into water^ must not, after reasonable mixing, cause the receiving water body^ to breach the water quality standards for visual clarity set out in Schedule E for that water body^. (c) The activity must not occur on land^ that is in, or within 5 m of: (i) the bed^ of a river^ that is permanently flowing (ii) the bed^ of a river^ that is not permanently flowing and has an active bed* width greater than 1 m (iii) the bed^ of a lake^. (d) The activity must not occur on land^ that is in, or within 10 m of: (i) A wetland^ as identified in Schedule F (ii) Sites valued for Trout Spawning as identified in Schedule B	

How has this provision been applied to resource consents?

Rule 13-5 is a permitted activity, which means resource consent is not required to undertake this activity. The comments and anecdotal evidence provided by staff in relation to Rule 13-1 also apply to this rule.

Summary and assessment of Rule 13-5 effectiveness:

The comments provided in relation to Rule 13-1 also apply to this rule.

5.1.5.6 Rule 13-6 Specified vegetation clearance*, land disturbance* or cultivation* in a Hill Country Erosion Management Area*

Rule	Activity	Classification	Conditions / Standards / Terms	Control / Discretion Non-Notification
13-6 Specified vegetation clearance*, land disturbance* or cultivation* in a Hill Country Erosion Management Area*	Pursuant to s9(2) RMA, except as regulated by Rule 13-8 and 13-9, any: (a) land disturbance* of more than 100 m2 per property* per 12-month period, or (b) vegetation clearance* of 1 ha or greater per property* per 12-month period where the age of the vegetation in the area to be cleared is greater than seven years, or (c) cultivation*, undertaken within a Hill Country Erosion Management Area* and any ancillary: (a) diversion of water^ pursuant to s14(2) RMA on the land^ where the vegetation clearance*, land disturbance* or cultivation* is undertaken, or (b) discharge^ of sediment into water^ pursuant to s15(1) RMA resulting from the vegetation clearance*, land disturbance* or cultivation*.	Restricted Discretionary	(a) The activity must not take place on land^ that is within a coastal foredune*. (b) The activity must not occur on land^ that is in, or within 10 m of: (i) the bed^ of a river^ that is permanently flowing, (ii) the bed^ of a river^ that is not permanently flowing and has an active bed* width greater than 1 m, (iii) the bed^ of a lake^, (iv) a wetland^ as identified in Schedule F, (v) sites valued for Trout Spawning as identified in Schedule B, (vi) Sites of Significance - Aquatic as identified in Schedule B.	Discretion is restricted to: (a) the location, nature, scale, timing and duration of the activity, (b) effects^ of the activity and associated sediment run-off on soil conservation, surface water^ quality and aquatic ecology and the methods to be taken to avoid, remedy or mitigate them, (c) the requirement to provide an Erosion and Sediment Control Plan*, the content of and standard to which the plan must be prepared, the implementation of the plan, and the timing of when it must be prepared and submitted, (d) the provision of greater setback distances from water bodies^ than those specified under condition (b) to provide greater protection to a water body^ if required, (e) the extent of non-compliance with the water quality target* for visual clarity set out in Schedule E, (f) duration of consent, (g) review of consent conditions^, (h) compliance monitoring, (i) the matters in Policy 14-9. Resource consent^ applications under this rule^ will not be notified and written approval of affected persons will not be required (notice of applications need not be served^ on affected persons). Advice Note: Examples of alternative methods to avoid, remedy or mitigate sediment run-off can be found in: (a) Chapters 3-9 of the Erosion and Sediment Control Guidelines for the Wellington Region" (September 2002, and (b) The Code of Practice for Commercial Vegetable Growing in the Horizons Region (Horticulture New Zealand).

How has this provision been applied to resource consents?

Rule 13-6 is a restricted discretionary activity, which means resource consent is required to undertake this activity.

Data obtained from Horizons' consents database, IRIS, indicates 28 individual consents that refer to Rule 13-6 have been granted since the plan became operative[114]. Based on an assessment of a sample of these consents (10 consents), this provisions appears to be being applied correctly in relation to significant indigenous biodiversity. In each of these consents, the land disturbance was not proposed to occur in, or within 10 metres of Schedule B or Schedule F sites. Generally, the consent decision included an assessment as to whether these sites existed within close proximity of the proposed activity.

In addition, the anecdotal evidence provided by staff in relation to Rule 13-1 also applies to this rule.

Summary and assessment of Rule 13-6 effectiveness:

Anecdotally, feedback has been provided from Council's Regulatory Team that the Indigenous Biodiversity One Plan rules are working effectively.

In addition, this provision appears to be being applied correctly to resource consent applications.

[114] Source: IRIS

5.1.5.7 Rule 13-7 Vegetation clearance*, land disturbance*, cultivation* or forestry* that does not comply with Rules 13-1 to 13-6

Rule	Activity	Classification	Conditions / Standards / Terms	Control / Discretion Non-Notification
Rule 13-7 Vegetation clearance*, land disturbance*, cultivation* or forestry* that does not comply with Rules 13-1 to 13-6	Except as regulated by Rule 13-8 and 13-9, any vegetation clearance*, land disturbance*, cultivation* or forestry* pursuant to s9(2) RMA that does not meet the conditions^, standards or terms of Rules 13-1, 13-2, 13-3, 13-4, 13-5 or 13-6 and any ancillary: (a) disturbance of the bed^ of a river^ or lake^ by forestry* authorised by those rules^ pursuant to s13(1) RMA (b) diversion of water^ authorised by those rules^ pursuant to s14(2) RMA, or (c) discharge^ of sediment or slash* authorised by those rules^ pursuant to s15(1) RMA.	Discretionary		

How has this provision been applied to resource consents?

An activity that would be in breach of Rules 13-1 to 13-6 Schedule F conditions defaults to Rule 13-7. E.g. If an activity was to require consent because it was located 5 metres from a rare, threatened or at-risk habitat, consent would be required under rule 13-7. The consents planner would consider the effects of the activity on the Schedule F habitat.

Data obtained from Horizons' consents database, IRIS, indicates 57 individual consents that refer to Rule 13-7 have been granted since the plan became operative. Two others were withdrawn. Fifty four were non-notified, 2 had limited notification, and 2 were publicly notified.

An assessment of a sample of these consents has shown that they included:

- Consent for a territorial authority to strengthen a Bridge and install a Debris Deflector. Effects on water quality and vegetation removal were assessed by Horizons' Freshwater and Partnerships Manager.
- Consent for a Trust to undertake works associated with an enhancement of the Manawatū River Loop at Foxton. The objective of the proposed works was to provide water quality improvements and habitat for aquatic and terrestrial organisms as well as improve recreational opportunities for the community. The enhancement works, included dredging, weed clearance and planting. The Manawatū Regional Council's Senior Design Engineer and Water Quality Scientist assessed the actual and potential effects on the environment of allowing the proposed activities.
- Consent for a territorial authority to undertake earthworks adjacent to the Whanganui River, to allow for the realignment of a road, and to discharge cleanfill as part of the works. The application was assessed against water quality, aquatic ecology, and management values.
- Consent to undertake works within 10m of a stream and the construction of a new vehicle bridge.
- Consent to divert a modified watercourse including the installation of a culvert and associated earthworks, abstract groundwater (dewatering during construction) and diversion of water.

In none of these examples were activities occurring within Schedule F habitats. Each one of these included conditions to ensure environmental effects were less than minor. Examples of consent conditions include:

- Construction methodology, erosion and sediment control plan and flood contingency plans.
- The avoidance of discharge of contaminants that are toxic to aquatic ecosystems.
- Requirements to stabilise, re-contour and re-vegetate any disturbed areas within stream beds.
- Ensuring that for every tree that is removed that two of a similar species are replanted.
- The consent holder shall only commence works where there is settled weather forecast.
- The consent holder shall provide an Operations and Management Plan and an Erosion and Sediment Control Plan.
- The consent holder must have a person constantly monitoring the excavation for any freshwater mussels or other aquatic fish that has been removed.
- The consent holder must engage a suitably qualified person to collect as many freshwater mussels as can be found and translocate them to a different reserve area.
- Conditions relating to maintaining visual clarity of the water body.
- The consent holder shall progressively stabilise, re-contour and re-vegetate any disturbed areas.

Based on these examples, this provision has been given appropriate weighting during consenting conditions.

Summary and assessment of Rule 13-7 effectiveness:

This provision has been given appropriate weighting during consenting conditions, and is effective in triggering consent conditions to avoid, mitigate or remedy any effects on IB of proposed works that are considered to be more than minor.

Conversations with Horizons' Consenting Team Leader have indicated this rule serves benefit as a 'catch-all' for activities that do not fall under other Chapter 13 Rules.

5.1.5.8 Rule 13-8 Some activities within at-risk habitats*

Rule	Activity	Classification	Conditions / Standards / Terms	Control / Discretion Non-Notification
13-8 Some activities within at-risk habitats*	Except as regulated by Rules 14-5, 14-13, 14-24, 16-9, 17-2, 17-4, 17-5, 17-7 in relation to any existing small dam structure^, 17-14 and 17-15, any of the following activities within an at-risk habitat*: (a) vegetation clearance*, land disturbance* or cultivation* pursuant to s9(2) RMA (b) forestry* pursuant to s9(2) RMA that does not meet condition^, standard or term of Rule 13-3(b)(iii) or (e) (c) the drilling, construction or alteration of any bore* pursuant to s9(2) RMA (d) activities restricted by s13(1) or s13(2) RMA in the beds^ of rivers^ or lakes^ (e) the taking, using, damming or diverting of water^ pursuant to s14(2) RMA (f) discharge^ of water^ or contaminants^ into water^ or onto or into land^ pursuant to s15(1) or s15(2A) RMA. This rule does not apply to activities described in paragraphs (a) to (f) where they are carried out for the purposes of protecting or enhancing the habitat, including the control of pest animals and pest plants.	Discretionary		

How has this provision been applied to resource consents?

Rule 13-8 is a discretionary activity, which means resource consent is required to undertake this activity.

Data obtained from Horizons' consents database, IRIS, indicates 4 individual consents that refer to Rule 13-8 have been granted since the plan became operative (an additional application was withdrawn)[115] [116]. These consents were processed on a non-notified basis.

An assessment of these consents has shown that they consisted of consent to:

- Construct a pathway through 'at-risk habitats' under Schedule F of the One Plan. The assessment included an expert technical assessment of the 'effects on terrestrial ecology and biodiversity'. Conditions such as sediment control and restorative plantings (in accordance with an approved planting plan) were imposed.
- Construct a new, two span bridge over a stream. Consent was also required for the associated vegetation clearance to construct the bridge. This was due to vegetation adjacent to the waterbody being considered an 'at risk habitat'. The assessment included an expert technical assessment

[115] Source: IRIS
[116] Anecdotally, there is a concern that not all consents have been accurately recorded in IRIS. See earlier footnote (number 14).

of the 'effects on Indigenous Biodiversity and Schedule F Habitat'. A consent condition required the provision of a planting plan and revegetation of the disturbed areas with native species.

- Undertake geotechnical bore testing in the bed and riparian bank of the Manawatū River. The purpose of the works was to enable geotechnical investigations and gathering of information from core samples on the nature of the underlying soils, sediments and aggregates. This application included associated vegetation clearance for machinery access. An expert technical assessment identified the habitat to be an 'at-risk habitat' (due to the potential lizard habitat and SOS-R Dotterel Value), and consent conditions were imposed (including a Lizard Management Plan and a vegetation survey from a herpetologist).
- Enable geotechnical investigations to inform the design and construction of a highway. This included land use consent for land disturbance (drilling of boreholes) and associated discharge of artesian water to water within At-Risk habitats. The assessment included an expert technical assessment of the 'Terrestrial Ecology' effects. The expert was satisfied that the application fully considered the effects on terrestrial and wetland indigenous ecosystems and proposed management regimes and conditions to ensure those effects are adequately managed.

The above bullet points provide brief summaries, and additional considerations and consent conditions also applied. These assessments indicate that this provision has been given appropriate weighting during consenting conditions, and is effective in triggering consent conditions to ensure proposed works on indigenous biodiversity are considered to be no more than minor.

Summary and assessment of Rule 13-8 effectiveness:

This provision has been given appropriate weighting during consenting conditions, and is effective in triggering consent conditions to avoid, mitigate or remedy any effects on IB of proposed works that are considered to be more than minor.

5.1.5.9 Rule 13-9 Some activities within rare habitats* and threatened habitats

Rule	Activity	Classification	Conditions / Standards / Terms	Control / Discretion Non-Notification
13-9 Some activities within rare habitats* and threatened habitats	Except as regulated by Rules 14-5, 14-13, 14-24, 16-9, 17-2, 17-4, 17-5, 17-7 in relation to any existing small dam structure^, 17-14 and 17-15, any of the following activities within a rare habitat*, threatened habitat*: (a) vegetation clearance*, land disturbance* or cultivation* pursuant to s9(2) RMA (b) forestry* pursuant to s9(2) RMA that does not meet condition^, standard or term of Rule 13-3 (b)(iii) or (e) (c) the drilling, construction or alteration of any bore* pursuant to s9(2) RMA (d) activities restricted by s13(1) or s13(2) RMA in the beds^ of rivers^ or lakes^ (e) the taking, using, damming or diverting of water^ pursuant to s14(2) RMA (f) discharge^ of water^ or contaminants^ into water^ or onto or into land^ pursuant to s15(1) or s15(2A) RMA. This rule does not apply to activities described in paragraphs (a) to (f) where they are carried out for the purposes of protecting or enhancing the habitat, including the control of pest animals and pest plants.	Non-Complying		

How has this provision been applied to resource consents?

Rule 13-9 is a non-complying activity, which means resource consent is required to undertake this activity.

Data obtained from Horizons' consents database, IRIS, indicates 20 individual consents that refer to Rule 13-9 have been granted since the plan became operative[117]. Nineteen were non-notified, and one was publicly notified (being a Te Ahu a Turanga Manawatū-Tararua Highway Construction Proposal).

An assessment of a sample of these consents has shown that they included consent to:

- Install two pedestrian bridges on the Fern Walk in Totara Reserve Regional Park. This included removal of Schedule F 'threatened' habitat types. The assessment included an expert technical assessment of the 'effects on biodiversity'. A consent condition was "planting of at least 20 square metres of indigenous vegetation (being more or equal to the amount to be lost from the activity), comprising of the species affected by any vegetation clearance, in an area within the Fern Walk track.
- Discharge filtered stormwater via a treatment system into an Oxbow lake which has been assessed as a 'threatened habitat' under Schedule F of the One Plan. This also included consent to construct a secondary inlet structure for stormwater control purposes within a threatened habitat. The

[117] Source: IRIS

application includes an ecological report, which was reviewed by a Council expert. It was noted that "Despite being assessed as a threatened habitat under the One Plan, the oxbow is located within a highly modified environment and water quality within the oxbow is considered to be highly degraded". A consent condition included riparian planting.

- Legalise an existing water take from a lake. The lake and its margin is identified as "threatened" habitat type in the One Plan. The assessment included an expert technical assessment of the 'ecological effects'. Consent conditions included monitoring of the lake levels and water use.
- Replace existing jetties on the Hokowhitu Lagoon. The lagoon falls under the Schedule F habitat 'Lakes, lagoons and their margins' as a Threatened habitat. The assessment included an expert technical assessment of the 'effects on a threatened habitat (Schedule F)'. The methods and mitigations were assessed to cause low levels of disturbance to an already heavily modified environment, and the effects on the threatened habitat type were assessed to be less than minor.
- Undertake vegetation clearance of a threatened habitat to allow for the construction of a residential dwelling. The assessment included an expert technical assessment of the 'effects on threatened habitat'. Conditions were imposed related to bird nesting, invertebrates and lizard protection, and planting replacements.

The above bullet points provide brief summaries, and additional considerations and consent conditions also applied. These assessments indicate that this provision has been given appropriate weighting during consenting conditions, and is effective in triggering consent conditions to avoid, mitigate or remedy any effects on IB of proposed works that are considered to be more than minor.

The below comments, from the s35 Freshwater (in relation to wetlands), are also worth noting here:

"While there have only been a small number of consents granted, it is possible that this is due to advice given by Horizons' biodiversity team resulting in a proposal being changed or abandoned before it gets to the consenting stage... At present there is no way of assessing how often Horizons' advice has changed the course of a proposal. In the case that a proposal is changed and assessed under a different rule framework or abandoned because the effects are such that the non-complying consent framework is not a viable pathway, it can reasonably be argued that the provisions are effective... Therefore, while it can't be measured with any accuracy, anecdotal accounts from the biodiversity team suggest that the free-advice given by the team (Method 6-9) increases the effectiveness and efficiency of the rule and policy framework. ***...****there is only a small number which is evidence that the objective and rule framework is effective. If multiple applications were granted for many sites, then one would question whether the rules are actually effective in ensuring rare and threatened habitat is maintained and extent is not lost."*

Conversations with Horizons' Consenting Team Leader align with the above comments. Changes to proposals are likely to occur during the pre-application phase in response to advice staff provide, as opposed to after consents have been lodged[118].

Summary and assessment of Rule 13-9 effectiveness:

This provision has been given appropriate weighting during consenting conditions, and is effective in triggering consent conditions to ensure environmental effects are considered to be no more than minor.

[118] Source: S Westcott, personal communications, October 2024.

5.1.6 Effectiveness of Chapter 19 provisions

Policy
19-1 A financial contribution may be imposed as a *condition*^ of consent for the following types of activities and for the following purposes: (c) **Indigenous *Biological Diversity*^** – A financial contribution may be imposed as a *condition*^ of consent for any type of activity that has significant adverse *effects*^ on indigenous *biological diversity*^ in circumstances where such adverse *effects*^ will not be adequately avoided, remedied or mitigated. The purpose of the financial contribution must be to offset the adverse *effects*^ by providing for the protection, restoration or enhancement of indigenous *biological diversity*^ in a location with similar indigenous *biological diversity*^ values.

Guiding questions for evaluation
Has the regional council imposed financial contributions? If so, have they achieved the purpose of policy 19-1(c)?

Chapter 19 provisions have been evaluated in a separate Section 35 report (relating to administration provisions in the One Plan). The below text is a snippet from that evaluation report:

> *"The purpose of enabling a financial contribution to be imposed is generally to offset adverse environmental effects that cannot be avoided, mitigated or remedied. Chapter 19 of the One Plan is included to satisfy the requirements of the RMA in relation to setting out situations when financial contributions may be required, how the level of contribution will be determined and matters Horizons will consider when deciding whether to impose a financial contribution and how they would be used. The three policies that guide these decisions are:*
>
> > *Policy 19-1: Situations where financial contributions may be required and the purpose of financial contributions;*
> >
> > *Policy 19-2: Amount of contribution; and*
> >
> > *Policy 19-3: Matters to be considered for financial contributions.*
>
> *In practice, however, the use of financial contributions has been extremely limited, as signalled in One Plan section 19.1 (Scope and background). This section also notes that, although Horizons' first generation plans also enabled financial contributions, none had ever been imposed. To date, it is understood that Horizons' only use of this mechanism has been in relation to gravel extraction on the Rangitīkei River[119]. While there have been proposals where the applicant has asked for their use to be considered, it appears that the effects they would have compensated for were able to be avoided, remedied or mitigated[120]."*

Discussions with Horizon's Consenting Team Leaders[121] have confirmed the above. It was noted that the policy hierarchy (avoid, remedy, mitigate, offset, financial contributions) provides alternatives that have prevented the need for financial contributions to be imposed.

Summary and assessment of Chapter 19 effectiveness:

There is insufficient evidence to make an assessment.

[119] Noting that the application of Policies 19-1 to 19-3 to consents granted through the One Plan as amended in 2016 and 2018 is unavailable because the Horizons IRIS database does not enable this to be recorded. At the time this was being set up, the 2017 amendments signalled the end of financial contributions so it was considered unnecessary to include these policies.
[120] Source: L. Shirley, personal communication, 16 February 2023.
[121] Source: S. Westcott and J. Mitchell, personal communication, 8 March 2024.

5.1.7 Effectiveness of Schedule F

Schedule F is a component of the Regional Plan. The extent of rare, threatened, and at-risk habitats has never been mapped in our region. The One Plan describes significant habitats (in Schedule F) and identifying them as rare, threatened or at-risk. Activities located within these habitats are regulated, with a non-complying activity status for rare and threatened habitats and discretionary for at-risk. Activities adjacent (within 5, 10 or 50 metres) to some habitat types are also regulated[122].

Resource consent is needed for many activities that adversely affect any area of indigenous biodiversity or habitat that meets the criteria of at-risk, rare or threatened.

The way Horizons manage the identification of rare, threatened and at-risk habitats is through the use of:

- Indicative modelling or desktop assessments, which are used to identify potential rare, threatened and at-risk habitats in the area of interest, and
- In the field assessments, which confirms the presence of a rare, threatened or at risk habitat based on the criteria listed.[123]

Guiding questions for evaluation
Does Schedule F have the support of users – is the plan perceived to work, are the provisions enforceable?

On one hand, Schedule F is considered to work well in protecting the specific types of biodiversity habitats it identifies wherever it is in the region, regardless of whether it is a known site or not (seeing as any area that meets the description of a rare, threatened or at-risk habitat type is subject to regional plan rules). The rules around activities in significant habitat are generally supported[124].

However, plan users have identified a few challenges and considerations for future plan changes:

- It's often hard to apply the Schedule F criteria in the field because the Schedule F habitat descriptions are somewhat broad and vague, creating ambiguity. This can be challenging, even for an ecologist[125].
- Schedule F protects the habitat of only one subspecies of giant land snail but other subspecies need the protection just as much, if not more.
- A suggestion was put forward that the policy around Schedule F habitats (specifically, but perhaps not limited to, wetlands) needing to be indigenous dominant should be revisited. In many cases it is possible to have a functioning wetland ecosystem that is not indigenous dominant due to the (often recent) presence of weed species. Under current policy these are not protected by plan rules[126].
- Some examples have been identified where wetlands have not been assessed as 'rare, threatened or at-risk habitat', despite holding significant ecological value[127].
- Schedule F addresses indigenous flora, but not indigenous fauna (or fungi)[128]. A question has been raised around provision for protecting fauna in sites that do not meet the Schedule F descriptions. A suggestion was put forward that the presence of native wildlife

[122] Rules 13-8 and 13-9 only get triggered if the activity is within the habitat. An activity outside the habitat that affects it will be captured by one of the other rules in the Plan – usually a default discretionary rule (e.g. rule 13-7 for land use activities)
[123] Source: L Cook, personal communication, March 2024.
[124] Source: L Cook, personal communication, March 2024.
[125] Schedule F does clearly note that it is recommended a suitably qualified expert is engaged for assistance with interpreting and applying Schedule F.
[126] Source: E Daly, personal communication, August 2019.
[127] Source: L Jansen, personal communication, August 2019.
[128] Both fauna and fungi are in the definition of IB in the NPS-IB 2023.

should be the trigger for habitat protection, regardless of whether it's indigenous or not[129]. It is noted that:

- Sometimes consent is required for another matter and then, if appropriate, the habitat of threatened species is considered under Policy 13-5 – but this process is not straight forward.
- Many threatened species are protected by the Wildlife Act 1953, however enforcing this in some instances provides challenges (and falls to DOC rather than regional councils).
- As part of our NPS-FM implementation programme, we are exploring how we can improve the scope and methodology of our threatened species mapping beyond what we currently have in Schedule B.
- As part of our NPS-IB implementation programme, we will need to explore avenues for additional protection of species (in addition to habitats). A report by Beca (see Section 5.1.8) identified that *"The One Plan manages indigenous biodiversity through habitats while NPS-IB seeks to manage the effects on species, including highly-mobile species. The One Plan will need to be updated to reflect the importance of managing effects on species including migratory species and identify whether additional controls are necessary".*

- If new habitat types are identified that are appropriate to include in Schedule F, this will need to occur via a RMA Schedule One Plan Change process.
- There is potentially an issue with SNAs being destroyed by people when it is clear that areas will become SNAs, but aren't yet[130].

Horizons' Environmental Scientist Ecology believes all biodiversity area that meets the criteria for Schedule F habitat is highly significant in our region. That is due to the way Schedule F was designed, to represent habitat types that have suffered the greatest (and most significant) losses in extent or are naturally rare and therefore vulnerable. However, they are also of the belief that Schedule F doesn't cover all habitats that are nationally or regionally significant. For example, Schedule F often doesn't cover habitat of critically endangered species and doesn't cover any type localities of any species. It also doesn't cover degraded wetlands, even though all wetlands are considered rare and threatened, and the reality is that most are in a poor ecological condition. It is noted that the NPS-FM provides stronger protection for all wetlands. Many alpine habitats are also not covered by Schedule F because they haven't suffered a great loss in extent[131].

Feedback from staff at Palmerston North City Council noted that:

> *"When the One Plan was developed we were concerned that by not mapping SNAs they might be destroyed without people knowing they need consent. This doesn't appear to have been an issue for us"[132].*

The requirement within the NPS-IB for mapping of SNAs in district plans will have significant implications to the One Plan, including Schedule F. However, at the time of undertaking this evaluation, there is uncertainty in this space. On 14 March 2024 the Government announced they have agreed to suspend the requirement for councils to comply with the SNAs within the NPS-IB for three years. At the time of writing this evaluation, no formal amendment to the NPS-IB has been made[133].

[129] Source: Forest and Bird, personal communication, September 2022.
[130] See point 70 of the NZPI submission on the RM Bill 1.
https://planning.org.nz/resources/Attachment?Action=Download&Attachment_id=1000812
[131] Source: L Cook, personal communication, July 2024.
[132] Source: D Murphy, PNCC, via email, 21 June 2024.
[133] The NPS-IB is discussed further in Section 5.1.8 of this report.

Summary and assessment of Schedule F effectiveness:

Schedule F is considered to work well in protecting significant biodiversity. The rules around activities in significant habitat are generally supported. However, plan users have identified a few challenges and considerations for future plan changes:

The requirement within the NPS-IB 2023 for mapping of SNAs in district plans will have significant implications to the One Plan, including Schedule F.

Future Considerations:

Refer to the bullet points above.

5.1.8 Giving effect to NPS-IB

Early in 2024, Beca was commissioned by Council to assess the extent to which the One Plan aligns with the NPS-IB. On 25 March 2024, Beca completed a report: 'Analysis of Horizons One Plan and the National Policy Statement for Indigenous Biodiversity'. This report captures the NPS-IB requirements and provides commentary on how the One Plan may or may not align with the NPS-IB.

For each NPS-IB requirement, the Beca report includes an assessment of alignment with the One Plan. A summary of the level of alignment is provided below:

Alignment categories	No. of NPS-IB requirements in each category
Good level of alignment between NPS-IB and One Plan, with some amendment required.	10
Some alignment between NPS-IB and One Plan. Further investigation, review and implementation work required. High level of human resource required.	17
Priority to address early. NPS-IB and One Plan not aligned and requires investigation and determination and/or includes a principle which will impact later decisions. Will require considerable resource and/or multiple stakeholders.	14

The above indicates high levels of dis-alignment, or partial alignment, between the NPS-IB and the One Plan. A significant component of a future (indigenous biodiversity focused) plan change will be responding to the NPS-IB requirements. The Beca report identifies considerations for achieving alignment, and recommended next steps, which can be used to help inform a plan change.

Some of the reasons for dis-alignment, or partial alignment, include:

- The One Plan has a focus on 'significant' habitats, whereas the NPS-IB simply refers to IB (all encompassing).
- It is anticipated the focus on 'habitat' within the One Plan is restrictive and limits application of NPS-IB.
- The NPS-IB creates a need to review definitions, to ensure consistency, alignment and relevant definitions are captured. A number of the glossary definitions in the One Plan need to be updated to align with the NPS-IB while others which will require further consideration as the policy and rule framework is developed.
- SNAs will need to be incorporated into the One Plan policy framework.
- Geothermal ecosystems are not identified within One Plan.
- Limited identification of highly mobile fauna within One Plan.
- Need to reflect role of IB in climate change and conversely promote IB's positive contribution to the management of climate change.
- Tangata whenua are recognised as key partners for the effective management and protection of indigenous biodiversity. The NPS-IB has set out a clear minimum engagement standard that Horizons must implement. An engagement plan with tangata whenua will need to be advanced as a priority given the specific duties set out in NPS-IB.
- Need to identify current area of urban and non-urban IB cover within the region. This will include a GIS/aerial mapping project or similar.

It is important that the findings of this evaluation report are read in conjunction with the findings of the Beca report discussed above. The Beca report (Analysis of Horizons One Plan and the National Policy Statement for Indigenous Biodiversity) is provided as **Appendix One**.

It is also noted that at the time of writing this evaluation report the government is considering making changes to the NPS-IB.

5.1.9 Additional effectiveness considerations

In addition to the considerations previously raised in this report, the following issues were identified during the preparation of this report and/or during enforcement of the One Plan.

Do the plan provisions have the support of users – is the plan perceived to work, are the provisions enforceable?

On the whole, the plan provisions relating to indigenous biodiversity appear to work and are enforceable. Potential issues raised by those using the framework for activities in this area is outlined in the table below.

Indigenous Biodiversity: Issues with rule and policy framework	
Subject / issue	**Background/explanation/ notes**
Enhancement of lakes and wetlands	Where lakes are Schedule F habitat and works are proposed to enhance them, there is an inconsistency between the rules in Chapter 17 and Rules 13-8 & 13-9. Latter do not reference section 13 of the RMA, therefore disturbance of lake beds cannot be considered against them; Chapter 17 has to apply. From the consent application to enhance Lake Koputara: *The activity status of project activities involving removal of plants and ancillary activities is assessed as a Discretionary Activity under Rule 17-23 according to the following rationale:* *a. Rule 17-19 Plants Permitted Activity - Condition (e) cannot be complied with because the activity is in a threatened habitat. (Note: In all other respects the activity complies with the Permitted Activity conditions);* *b. Rule Guide refers activities undertaken in threatened habitats to regulation under Rule 13-9;* *c. Rule 13-9 Some activities in rare habitats and threatened habitats – This Rule excludes activities carried out for the purposes of protecting or enhancing the habitat;* *d. Unlike land use activities, there is a presumption in the RMA that an activity cannot be done unless allowed by a planning instrument, so the assessment returns to Chapter 17;* *e. Activities that do not comply with other rules (in this case Rule 17-19) are dealt with as Discretionary Activities under Rule 17-23.* *It is therefore concluded that the removal of plants from the bed of Lake Koputara and ancillary activities requires resource consent. All other project activities (land disturbance and vegetation clearance) can be done as unregulated land use activities.*
Heavily modified lakes with rare and threatened habitats	Lake Koitiata is heavily modified and is no longer classified as a lake, but still technically has rare and threatened status under Schedule F. Therefore any works in and around this area would require resource consent under rules 13-9 as a non-complying activity. There are likely other lakes or areas that will fall into this same category.
The One Plan's approach to indigenous biodiversity management focuses primarily on habitats, rather than on individual species	Feedback from Whanganui DC[134]: *The One Plan's approach to indigenous biodiversity management focuses primarily on habitats, rather than on individual species or genetic diversity, and proposes to take a more active role in coordinating indigenous biodiversity management within the region.* *Of particular note, the plan to halt the decline and actively manage rare, threatened and at-risk habitats, makes the assumption that indigenous fauna will only be living within these environments.*

[134] Source: L Huirua, via email, 4 July 2024.

Indigenous Biodiversity: Issues with rule and policy framework	
Subject / issue	**Background/explanation/ notes**
or genetic diversity	*This is also apparent in Objective6-1: Indigenous biological diversity:* *Protect areas of significant indigenous vegetation and significant habitats of indigenous fauna and maintain indigenous biological diversity, including enhancement where appropriate.* *This objective does not allow for the protection of indigenous fauna that is living in an exotic habitat. An example of this was the discovery of the largest community of skinks which had been corralled out of their native environment as a result of urban development, and were living in rough vegetation area (under an abandoned plywood sign) on a golf course in Whanganui. They were not afforded any protection as they were not within an indigenous habitat. Ongoing urban development is likely to necessitate adaptation of native fauna, where species may have modified their indigenous environment. This is not recognised within the current objectives or policies.* *Policy 6-3: Proactive management of indigenous biological diversity aims to maintain or enhance indigenous biological diversity by working in partnership with relevant landowners or other interested parties. However, in the case above, there was no ability to support the landowner to protect this rare and threatened species, as it was not found in a threatened habitat.* *While rare and threatened habitats are protected through the Regional Policy Statement, we request that consideration be given to broaden this to include rare and threatened species within modified habitats.*
Grazing of bush blocks	The One Plan provisions as currently worded allow landowners to graze bush blocks, which is a really damaging activity.
The separation of terrestrial indigenous biodiversity from aquatic	In the Proposed One Plan, SOS-A were proposed to be classified as at-risk habitats. The separation of terrestrial indigenous biodiversity from aquatic has led to some gaps and overlaps between the regulations, particularly around wetlands and lakes[135].

Are the provisions flexible enough to apply to circumstances which change over time?

Indigenous Biodiversity: Issues with rule and policy framework	
Subject / issue	**Background/explanation/ notes**
Evolving approaches to Indigenous Biodiversity programmes	Some IB programmes have changed or morphed at a reasonably high frequency, which means approaches don't nicely align with some wording in the One Plan[136]. Often this has been a result of resourcing challenges and the need to allocate resources as effectively as possible. Objectives remain the same but approaches adapt. This has meant that some of the methods referred to in the One Plan no longer align with actual approaches. This issue was noted by numerous staff members that contributed to the preparation of this report.
One Plan glossary terms relating to indigenous biodiversity	A future plan change will need to consider the suitability of glossary terms. For example, 'indigenous biological diversity' may be better replaced by the more commonly used 'indigenous biodiversity' (which would also create consistency with the NPS-IB).

Are there emerging issues that are not being addressed?

Deer and goats are one of the big limitations to Horizons' non-regulatory biodiversity work (deer especially). Since the One Plan became operative, they have increased in extent and abundance across the country, and are now a much bigger threat to indigenous biodiversity than in the past.

[135] Source: P Tucker, personal communication, August 2024.
[136] Source: C Davey and R Fleeson, personal communication, 12 March 2024.

They are now preventing regeneration in forests and wetlands throughout the region. This will eventually lead to the collapse of these ecosystems and could cause the extinction of some rare ecosystem types. Horizons has built a lot of stock fences around significant biodiversity sites but they don't keep deer and goats out. Deer-proof fences are hugely expensive and not feasible in a lot of places. Large-scale control of deer and goats is needed but this is beyond what Horizons can do anything about alone. This is an issue that has emerged since the One Plan became operative and any future direction of the One Plan biodiversity policies will need to take this issue into account because it's currently preventing our protection and enhancement works from being fully effective at stopping the decline of biodiversity[137].

The NPS-IB introduces new requirements for Council, but a programme is in place to implement its requirements. This is discussed earlier in this evaluation (see Section 5.1.8).

[137] Source: L Cook, personal communication, September 2024.

5.1.10 Summary of effectiveness

The below table provides a very brief summary of the 'effectiveness' of indigenous biodiversity provisions. It is noted that this report has identified future considerations for improvement in many instances, including for provisions listed below as 'effective'.

Provision	Assessment	Comments
Policies 6-1 & 6-2	Effective	Policies 6-1 and 6-2 are being implemented through the One Plan, District Plans, and consenting processes.
Policy 6-3	Effective	Policy 6-3 is being implemented, as management plans and incentive programmes have been established. Community grants have proven particularly successful.
Policy 6-4	Effective	Through various non-regulatory initiatives, Council has equipped landowners and others with the information they need to act as good stewards for indigenous biodiversity, and to act responsibly and proactively.
Policy 6- 5	Partially effective	There is a lack of alignment between the way Policy 6-5(a) is worded and the way we actually undertake our pest management functions. Regardless of the above, a 2024 Evaluation of Horizons Regional Council Pest Management Plan found that Council has been partially effective in its pest plant and pest animal management functions.
Method 6-1	Partially effective	While the target has not been implemented as stated in the method, the alternative approach taken by Council contributes to the intent of the method, which is to work with landowners to protect and enhance priority wetlands.
Method 6-2	Partially effective	Council has been partially implementing this method through the Priority Sites Programme. However, there is insufficient data available to comment on the effectiveness of this method. Challenges have been identified with establishing appropriate methods for monitoring effectiveness.
Methods 6-3 & 6-4	Partially effective	Methods 6-3 and 6-4 are partially being implemented by Council through a variety of methods, including community grants.
Method 6-5	Not effective	Method 6-5 has not been achieved. There are significant challenges related to requirements around resourcing, cost and suitable methods. Council is looking to address gaps by working with Crown Research Institutes and MfE to develop nationally consistent methods for monitoring and reporting.
Method 6-6	Effective	Method 6-6 has been achieved, due to the success of the Enviroschools programme.
Method 6-7	Effective	Horizons staff are actively engaged with land owners and Territorial Authorities to seek outcomes in resource consents and district plan reviews/changes that achieve this method.
Method 6-9	Effective	Method 6-9 is being implemented through a variety of methods.

AER 1	Unknown	Systems have not been established to fully measure this AER.
AER 2	Unknown	The indicators for this AER have not been measured.
Policy 8-4	Unknown	There is insufficient data to make a definitive assessment.
Chapter 13 Rules	Effective	Anecdotally, feedback has been provided from Council's Regulatory Team that the Indigenous Biodiversity One Plan rules are working effectively. Provisions have been given appropriate weighting during consenting conditions, and have been effective in triggering consent conditions to avoid, mitigate or remedy any effects on IB of proposed works that are considered to be more than minor.
Chapter 19 Provisions	Unknown	There is insufficient evidence to make an assessment.
Schedule F	Partially effective	Schedule F is considered to work well in protecting significant biodiversity. The rules around activities in significant habitat are generally supported. However, plan users have identified a few challenges and considerations for future plan changes.
NPS-IB alignment	Not effective (limited alignment)	There are high levels of dis-alignment, or partial alignment, between the NPS-IB and the One Plan. A significant component of a future (indigenous biodiversity focused) plan change will be responding to the NPS-IB requirements.

5.2 Efficiency assessment

Undertaking an efficiency assessment of One Plan Indigenous Biodiversity provisions has been challenging, as limited evidence is available. Much of the below consists of 'high level' assessments and anecdotal evidence.

Are the regulatory, consenting, administrative costs in line with what was anticipated?

Horizons' Consenting Team Leader has noted that consent applications for activities located within, or close to, Schedule F sites can result in increases to consenting costs. This is because applicants will require an ecological assessment as part of their assessment of environmental effects. Further, the ecological report will need to be peer-reviewed by a Council (or Council engaged) ecologist.

Consideration should be given to whether the One Plan's approach to identifying sites of significant indigenous biodiversity (via Schedule F, as opposed to mapping sites in the region) is efficient. It could be argued that Schedule F passes on the cost of ecological assessments from all ratepayers to consent applicants. However, the following points are noted:

- Consent applicants would likely require ecological assessments as part of their assessment of environmental effects, even if regional mapping had been undertaken, and
- Horizons offers free habitat assessments to identify Schedule F habitat prior to a resource consent application being lodged. These are carried out by the Science team ecologists.

Processing costs for applications are not representative of the true cost of getting a resource consent, as applicants engage planning and ecology experts to develop applications, which can come at a significant cost (what these costs equate to, is unknown).

The above process (and the associated costs) aligns with what would have been anticipated, based on the way the One Plan rule framework was established.

Horizons' Consenting Team Leader also noted that there are occasions when considering the cultural effects can delay consenting timeframes (although the 'clock stops' when Council sends further information requests).

The applicant's willingness to engage with the process is a factor when it comes to consent processing timeframes and costs. An applicant that completes the following actions is likely to go through a more efficient process once their application is lodged (as they will produce a higher quality application):

- engage in pre-application discussions (and factor in staff advice about the One Plan), and
- produce a high quality application (through methods such as engaging a planning consultant, producing a detailed assessment of environmental effects, and producing a detailed assessment of cultural effects)

The above findings demonstrate that **the staff advice functions of council have efficiency benefits** when it comes to regulating the One Plan rules. Conversations with Horizons' Consenting Team Leader align with the above comments. Changes to proposals are likely to occur during the pre-application phase in response to advice staff provide, as opposed to after consents have been lodged[138].

Are non-regulatory methods providing good value for money?

[138] Source: S Westcott, personal communications, October 2024.

Many of the One Plan IB provisions are non-regulatory, as have been discussed earlier in the effectiveness assessment. The earlier effectiveness assessments largely indicated that where non-regulatory methods were being implemented, they were effective, or partially effective. While it is difficult to try quantify benefits, findings do indicate there is value from grants, advice, education and other services. Changes have been made to non-regulatory methods as programmes are reviewed over time, and opportunities to improve efficiencies are identified. For example, Horizons' changes in approach to indigenous biodiversity education in schools.

Within the 2024-34 Long-term Plan, Council:

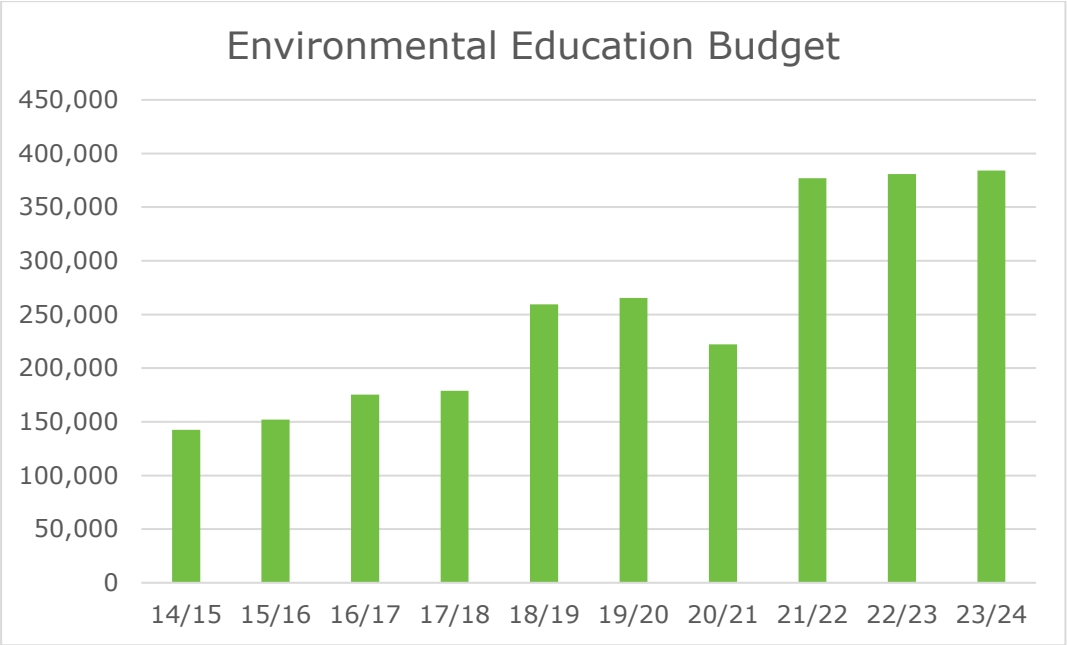
- Added an additional $100k per annum to the Kanorau Koiora Taketake - Indigenous Biodiversity Community grants. The programme has supported over 65 projects since its initiation in 2021.
- Included additional funding to improve the ongoing management of the more than 83 existing sites in the programme. Budgets for the project are forecasted to cost $360K for year 1 (similar to 2023-24 levels), increasing to approximately $810k per annum by year 3.
- Added a sixth Icon site (Ruahine Kiwi Trust) and increased the funding for four of the existing icon sites, increasing the Icon site and targeted rate project budget by $280k in year one of the Long-term Plan to $908k.

Kanorau Koiora Taketake – Indigenous Biodiversity Community Grant

In 2024, 33 community projects were awarded funding through the Kanorau Koiora Taketake – Indigenous Biodiversity Community Grant (27 successful applications) and Pūtea Hapori Urupare Āhuarangi - Community Climate Response Fund (six successful applications). Over 60 applications were received, with a trend showing the number of applications has been growing each year. Through the 2024-34 Long-term Plan process Horizons allocated an additional $100,000 to assisting community groups achieve biodiversity projects. The total funding allocated to both grants (in 2024) was $412,000, which includes funding allocation for eight multi-year projects from previous years. Amongst others, these projects include wetland restoration, animal and plant pest control, coastal restoration works, and tree plantings.

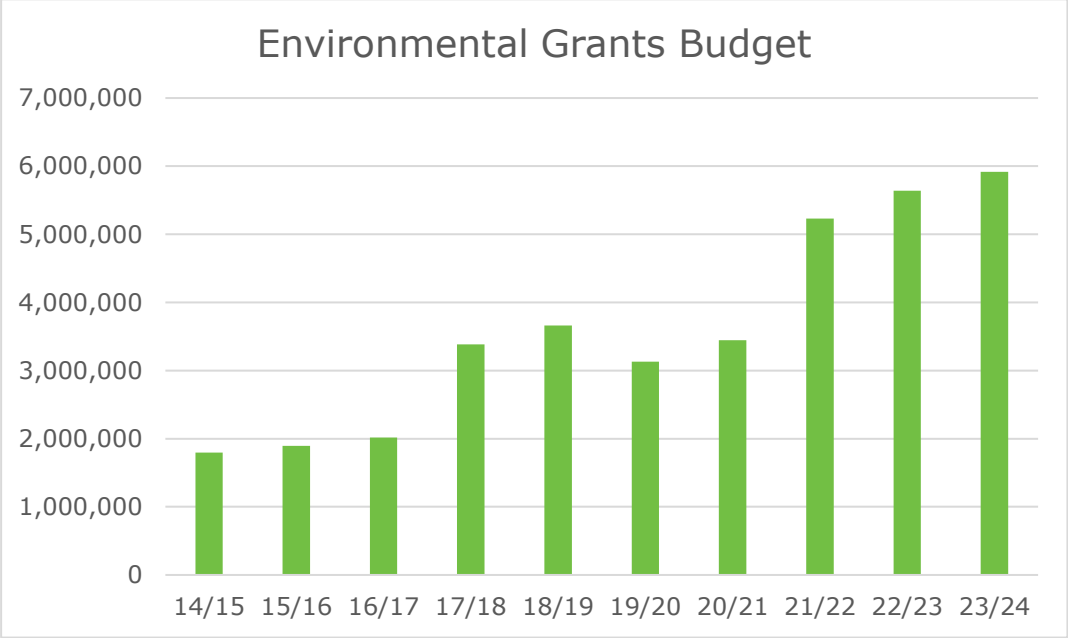
Environmental Education

The below graph shows Horizons' Environmental Education budget over recent years.



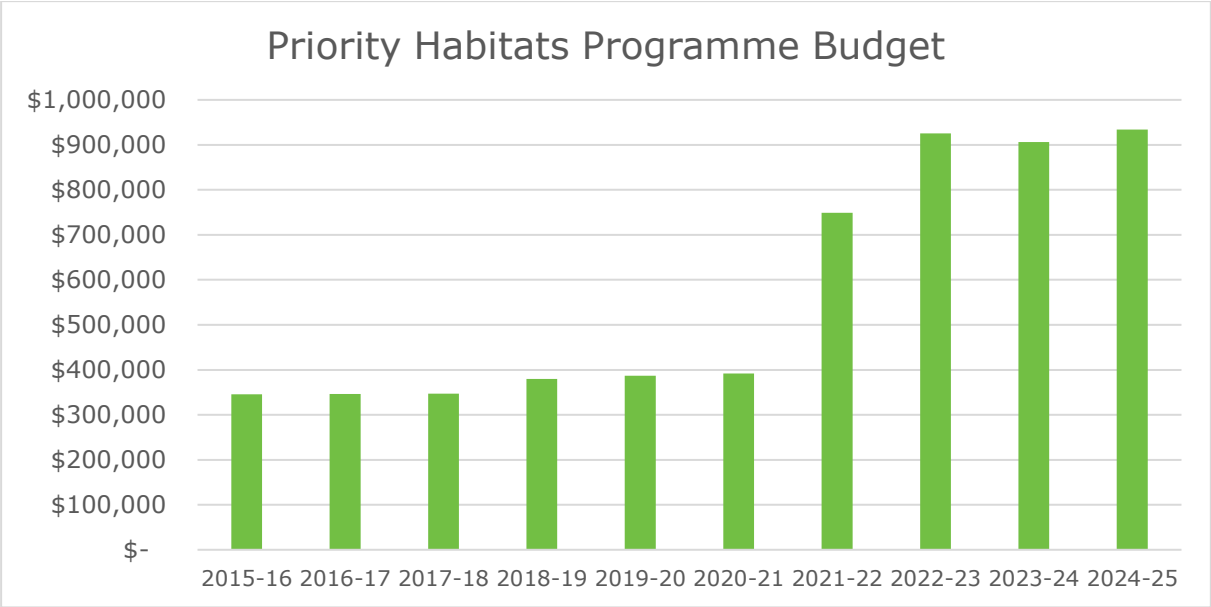
Environmental Grants

The below graph shows Horizons' Environmental Grants budget over recent years. **Note** that this includes grants for non-indigenous biodiversity focused projects.



Priority Habitats Programme

The below graph shows Horizons' Priority Habitats Programme budget over recent years.



The 'value' from non-regulatory programmes, such as environmental education and grants, are difficult to quantify (and measures are not in place to attempt to do so). However, it is known that these programmes have resulted in tangible benefits, such as indigenous biodiversity protection and enhancement (through methods such as fencing, weed control and animal pest control for a range of ecosystems).

Are there any additional costs, risks, legal risks, time/resource implications created as a result of the provisions? Is enforcement efficient?

In relation to unauthorised activities, this report has identified nine instances whereby abatement notices have been issued, two instances whereby infringement notices have been issued, and two instances of prosecutions[139]. In one instance, the recipient of an infringement notice had previously received an abatement notice.

If Council records had showed multiple instances of the same individuals receiving disciplinary action, that could indicate that enforcement action is inefficient and is failing to act as a deterrent. The fact that Council records do not show numerous instances of repeat offenders could be an indication that enforcement action is effective and efficient.

It is noted that Council made a submission to the Ministry for the Environment in March 2023 in relation to the review of the Resource Management Infringement Offences Regulations, expressing a view that "that the fines need to increase in order to support stronger deterrence, and avoid fines being viewed as business costs or licensing fees".[140]

What is the breakdown of activities undertaken by HRC staff and approximate costs?

See 'Appendix Two - Breakdown of activities undertaken by HRC staff and approximate costs (2020)'. This provides some costs that can be used as a baseline for future assessments, to compare changes over time (and potentially assist in assessing efficiency).

Final thought

[139] Source: P Kinaston and A Stacey-Matthews, personal communication, 11 July 2024.
[140] Source: M Reiche, Personal Communication, 12 July 2024.

Due to the nature of environmental monitoring, the multiple factors influencing state and trend data and the difficulty of controlling these influences to quantify the impact of one specific activity, there is no data that can accurately quantify the benefits of the implementation of our non-regulatory programs. However, scientific research and literature informs us of the expected benefits of these actions, as does controlled site-specific studies[141].

Summary and assessment of efficiency

Undertaking an efficiency assessment of One Plan Indigenous Biodiversity provisions has been challenging, as limited evidence is available.

The efficiency assessment identifies that there is benefit from both regulatory and non-regulatory methods, but there is insufficient data to accurately quantify these benefits.

Future Considerations:

The effectiveness assessment identified challenges with establishing effective systems for monitoring and reporting progress towards the indigenous biodiversity objective. To the extent possible, a future indigenous biodiversity plan change should be accompanied by a robust and enduring monitoring plan. This will also allow for a more detailed and accurate assessment of efficiency.

An alternative approach, where appropriate, may be to focus the funding available in to protection and enhancement works, and to rely on existing science documented within literature as an evidence base for this work.

[141] Source: L Hickey, Personal Communication, October 2024.

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Appendix One - Analysis of Horizons One Plan and the NPS-IB

Stored separately – See folder: \\file\herman\O\MS\10\23\NPS-IB Plan Change\Project Plan\Contract\Final Project Plan

Analysis of Horizons One Plan and the National Policy Statement for Indigenous Biodiversity

National Policy Statement for Indigenous Biodiversity Implementation Project Plan

Prepared for Horizons Regional Council
Prepared by Beca Limited

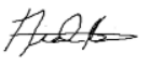
25 March 2024

Contents

Revision History

Revision Nº	Prepared By	Description	Date
1	Nicola Hine	Prepare report in this form.	25/03/2024
2	Nicola Hine	Update post Verification	26/03/2024
3	Nicola Hine	Update post Client Feedback	22/05/2024

Document Acceptance

Action	Name	Signed	Date
Prepared by	Nicola Hine		26/03/2024
Reviewed by	Robert Brodnax		26/03/2024
Approved by	Claire Webb		05/04/2024
on behalf of	Beca Limited		

Executive Summary

This report relates to our commission dated 12 February 2024 to provide Horizons Regional Council (Horizons) with a breakdown of tasks for implementation of the National Policy Statement for Indigenous Biodiversity (NPS-IB).

The NPS-IB came into effect on 4 August 2023. Regional and district councils are directed to implement the policy statement which contains policy, objectives, and implementation matters.

On 14 March 2024 the New Zealand Government announced they have agreed to suspend the requirement for councils to comply with the SNAs within the NPS-IB for three years. At the time of writing, no formal amendment to the NPS-IB has been made, and therefore no consideration of this announcement is contained within this report. We will broach this subject further in our Roadmap (refer to Beca *Expanded Methodology for National Policy Statement: Indigenous Biodiversity Implementation Plan ROI* dated 16 January 2024).

In order to identify the tasks required for successful implementation of the NPS-IB, it is necessary to first understand how the One Plan aligns with the NPS-IB. This report captures the NPS-IB requirements and provides commentary on how the One Plan may or may not align with the NPS-IB. From this analysis commentary, recommended next steps have been identified. These next steps will be further developed at the next stage to provide a breakdown of tasks.

The following table provides further analysis; however, we have identified the following tasks as key implementation matters for Horizons:

Legal review of the hierarchy of NPS-IB and Regional Policy Statements (RPS)

The NPS-IB requires district councils to map Significant Natural Areas provisions (SNAs) within their district plans, and the NPS-IB requires management of adverse effects on SNAs of new subdivision and development while Horizons have retained control over the adverse effects of the use of land on indigenous biodiversity via the One Plan RPS. It is unclear to us which instrument has precedent – and therefore which agency is the lead agency for mapping SNAs. A legal review is recommended to clarify this matter.

Management of species, as well as habitat/area

The One Plan manages indigenous biodiversity through *habitats* while NPS-IB seeks to manage the effects on species, including highly-mobile species. The One Plan will need to be updated to reflect the importance of managing effects on species including migratory species and identify whether additional controls are necessary.

Tangata whenua

Tangata whenua are recognised as key partners for the effective management and protection of indigenous biodiversity. NPS-IB has set out a clear minimum engagement standard that Horizons must implement. An engagement plan with tangata whenua will need to be advanced as a priority given the specific duties set out in NPS-IB.

Effectiveness of IB management under the One Plan

It will be necessary to gain an understanding of the current state of the *habitats* and indigenous biodiversity within the region and consider what has worked well with the One Plan approach, and what may require improvement. For instance, we recommend:

- A resource consent audit with multiple information captures of both regional and district land use consents, which will enable a gauge on the current effectiveness of the One Plan approach.

- Use of land cover data base and other indigenous vegetation information to track changes in the extent of indigenous biodiversity in the region since notification of the One Plan and if possible, to do with the information available to Council undertake some targeted assessment of changes in the state of remaining indigenous vegetation / habitat at some key sites.

Engagement with Territorial Authorities and Department of Conservation

Regardless of the outcome of the recommended legal advice, both NPS-IB and the One Plan require integration between Regional Council, Territorial authorities, and DOC – an ongoing engagement programme and potentially a working group is required to ensure alignment.

Biodiversity Strategy

Review existing strategies and clarify how they work together to achieve the objectives of The One Plan and NPS-IB. Use this review as an initial input to the scoping and preparation of a Regional Biodiversity Strategy that integrates regulatory and non-regulatory approaches to achieving the NPS-IB and One Plan targets.

Definitions

A number of the glossary definitions in the One Plan need to be updated to align with the NPS-IB while others which will require further consideration as the policy and rule framework is developed.

NPS – IB and One Plan Analysis

Methodology application and interpretation: This analysis is based on Horizons 'One Plan': The One Plan has incorporated Plan Amendment 3 (PA3) as at 27 February 2024 to incorporate the National Planning Standard. This overview is based on One Plan- 2014, amended by PA3 2024.

The One Plan acknowledges indigenous biological diversity as one of four critical issues (per RPS-SPMR-I4) and its intention is aligned with the philosophy of the NPS-IB, however the NPS-IB anticipates a stronger regulatory framework.

'Indigenous biological diversity' and 'indigenous biodiversity' are used interchangeably in this document and shortened to IB in most circumstances.

'Traffic Light' Key:

	Good level of alignment between NPS-IB and One Plan, with some amendment required.
	Some alignment between NPS-IB and One Plan. Further investigation, review and implementation work required. High level of human resource required.
	Priority to address early. NPS-IB and One Plan not aligned and requires investigation and determination and/or includes a principle which will impact later decisions. Will require considerable resource and/or multiple stakeholders.

NPS-IB Part 2: Objectives and policies:

NPS-IB Requirements	Implementation Method (how will One Plan satisfy NPS-IB)	One Plan Considerations / Commentary	HRC Requirements (Next Steps) *And comments for workshop*
Part 2: Objectives and policies		**RPS – ECO – Ecosystems and indigenous biodiversity *(Chapter 6)* and RP – ECO *(Chapter 13)***	
2.1 Objective (1) The objective of this National Policy Statement is: (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 (b) to achieve this:	Objectives, Policies, Rules, Methods *(to match intent)* Or Match Objective toe-to-toe	**RPS-ECO-O1: Indigenous biological diversity** - *protect areas of significant indigenous vegetation and significant habitats of indigenous fauna and maintain indigenous biological diversity, including enhancement where appropriate.* **RP- ECO – Ecosystems and IB** **EVO-01: regulation of activities affecting IB** *The regulation of resource use activities to protect areas of significant indigenous vegetation and significant habitats of indigenous fauna or to maintain indigenous*	RPS-ECO-01 will require amendment to align wording. Decide on implementation method(s) to achieve NPS-IB objective. Review of definitions and One Plan update required. ('tangata whenua', 'indigenous biodiversity') Establish base-line data of IB within the region, to gauge future 'at least no overall loss' and other targets/measures.

(i) through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and (ii) by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and (iii) by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and (iv) while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.		*biological diversity, including enhancement where appropriate.* There is good alignment of the intention of the policies, and interrogation of specific wording is required. 'No overall loss' wording reflected in RPs-ECO-PR1 (Principal Reasons) and the objective is reflected within RPS-ECO-AER1 (Anticipated Environmental Results), however wording used in other ECO policies are 'protect' 'maintain' and 'enhance' – is 'maintain' and 'protect' the same as 'no overall loss'? One Plan has a focus on 'significant' habitats – NPS-IB simply refers to IB (all encompassing). Furthermore, if One Plan is protecting 'significant' IB, has IB which is considered to be less than 'significant' been left to its own demise or has been adversely affected. One Plan does not include a definition of 'significant' nor 'significant indigenous biodiversity' but instead states significant natural landscapes to be areas identified as *Habitat.* Consider focus of IB management: One Plan manages the '*habitat*' as the main way to manage and protect IB. How does this align with NPS-IB Objective, and does no loss of habitat correlate with no loss of IB? It is anticipated the focus on 'habitat' within the One Plan is restrictive and limits application of NPS-IB.	Review One Plan *habitats* and the IB covered within the One Plan (physical areas captured within the schedules) against NPS-IB SNAs and IB. And amend to achieve alignment.

		Ecologist view is that habitat is often used interchangeably with ecosystem. Habitat refers to the ecosystem that a species inhabits but not necessarily the species themselves - in the case of fauna. The shift to indigenous biodiversity is a step away from that. Noting that RMA wording is "significant habitat for indigenous fauna". This focus usually plays out as vegetation or habitat / ecosystem focused significance criteria. NPS-IB 2.1(b) has alignment with One Plan. Examples of alignment of the One Plan with 2.1(b) matters apparent within RPS-ECO and RP-ECO, along with RPS-RMIA. *Indigenous means, for the purposes of Schedule F, vegetation comprised predominantly of indigenous species, but which may include scattered* exotic species.* *A rare habitat*, threatened habitat* or at-risk habitat* is an area of vegetation or physical substrate which:* *(a) is a habitat type identified in Table F.1 as being "Rare", "Threatened" or "At-risk" respectively,* *(b) meets at least one of the criteria described in Table F.2(a) for the relevant habitat type, and* *(c) is not excluded by any of the criteria in Table F.2(b)*	
2.2 Policies			
Policy 1: 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.	Objectives, Policies, Implementation methods, Agreements/MoU/Mana Whakahono o Rohe, monitoring, internal processes etc *(The*	One Plan outlines the principles within Statutory Context (Part 1: Introduction and General Provisions) and states that objectives and policies in the One Plan are in alignment with the principles of the Treaty.	No further action. One Plan will be strengthened with the integration of NPS-IB Policy 2 (and relevant implementation methods) as well as strengthened stewardship/kaitiaki principles, share decision making with tangata whenua, and incentivization

	principles of the Treaty are all encompassing) Or Apply toe-to-toe approach to all Policy.	Implementation of NPS-IB Policy 2 will affirm the decision-making principles.	programmes which aim to improve lands for the future generations.
Policy 2: Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through: (a) managing indigenous biodiversity on their land; and (b) identifying and protecting indigenous species, populations and ecosystems that are taonga; and (c) actively participating in other decision-making about indigenous biodiversity.	Implementation methods, Agreements/MoU/Mana Whakahono o Rohe, monitoring	RPS-RMIA provides good alignment with Policy 2 and includes matters such as RPS-RMIA-P1 which outlines hapu and iwi involvement in resource management, and methods such as RMIA-M2 Identification of Sites of Significance by working together (Council and hapu and iwi). Resource issues within RPS-RMIA cover a broad range of matters and are not solely IB focused. Inclusion of Implementation Methods to achieve Policy 2 will need to be included with RPS and RP One Plan Chapters in order to achieve clear direction and alignment (and intention). Note use of 'tangata whenua' in NPS-IB, and 'iwi' and 'hapu' within One Plan. Note wider implications of SNA mapping (NPS-IB 3.9 in relation to RMIA-M2)	Implementation of RPS-RMIA is likely to the key to achieving compliance with NPS-IB. Stock-take of internal processes and how Council is achieving RPS-RMIA, and engagement with iwi, to determine how Council are meeting the Policy. Review Definitions to ensure consistency, alignment and relevant definitions are captured.
Policy 3: A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.	Policy, Rules	**ECO-P1: Regional rules for activities affecting IB** outlines RC requirement to obtain resource consents for certain activities within rivers, lakes, rare, threatened and at-risk habitats, and forestry that does not minimize adverse effects. **ECO-P2: Consent decision-making for activities in rare habitats, threatened**	Consider defining 'precautionary approach' for this region, For instance.: **Precautionary Approach:** Recognizing the relative lack of knowledge about the environment by providing for prohibited, non-complying, or discretionary activities, where:

		habitats and at-risk habitats outlines decision making parameters. The need to obtain a resource consent for certain (specified) activities with quite specific exclusions can provide for a cautionary approach in its application. Unclear on how IB outside of habitats are managed with precaution.	there is insufficient knowledge to predict the effects of an activity; or there is reason to believe that the activity will have significant adverse effects; or it is not practicable to require the applicant to gather sufficient information prior to granting a consent to be able to predict the impact of the effects of the activity (Environment Waikato, 1996) Change One Plan to include a specific, clearly defined, 'precautionary approach' policy. Conduct an audit of resource consents granted to provide an insight into how IB has been managed.
Policy 4: Indigenous biodiversity is managed to promote resilience to the effects of climate change.	Objs, Pols, Rules, Implementation methods	RPS-SRMR - SRMS-13 includes Planning for Climate Change which outlines the issue and regional approach, with further reference to RPS-LF, RPS-EIT, and RPS-HAZ directly or indirectly addressing climate change matters. Climate change matters could not be identified within RPS-ECO and RP-ECO.	RPS-LF, RPS-EIT, and RPS-HAZ have not been reviewed. Review Council Climate Change Strategy documentation (if any available) to understand overall aims, priorities, and strategies for the region. Identify how promotion of IB will help to achieve this. Review Council's completed regional risk assessment (completed at high level) and determine if further investigation will provide further IB management guidance. Review One Plan Climate Change policies and objectives, discuss with

			Council, and develop Climate Change provisions in relation to IB. Investigate coastal resilience issues, changes in range of plant pest species, and other region-specific climate change effects to identify and manage within the One Plan.
Policy 5: Indigenous biodiversity is managed in an integrated way, within and across administrative boundaries.	Policy, Implementation methods	Part 1 includes 'Cross-boundary matters' and identifies the need to work with councils and sets out specific approaches to achieve this. • Refer to *Triennial Agreement for the Manawatu-Whanganui Region.* • One Plan identifies RC and TA roles and by default of the hierarchy of plans, District Plans should achieve Regional Plan requirements. . **RPS-ECO-P1: Responsibilities for maintaining indigenous biological diversity** outlines RC and TA responsibilities. Reflects RMA. **ROS-ECO-P5: Pest plant and pest animals** outlines functions of RC and TA in respect of pest plant and animal management.	Implementation of NPS-IB will require collaboration with Council's within the region. Review existing arrangements. Identify how to achieve coordinated implementation which includes matters such as timeframes and joint public engagement. Develop Comms and Engagement plan for how Horizons wants to engage with District Councils on indigenous biodiversity matters including consideration of a cross boundary working group to identify and resolve alignment issues.
Policy 6: Significant indigenous vegetation and significant habitats of indigenous fauna are identified as SNAs using a consistent approach.		RPS-NFL-P2 and Table 8 provides assessment factors of Natural Features and Landscape. This helps to achieve consistency of assessment. RPS-NFL-M2 Consistent Landscape Assessment aims to achieve this. Good alignment with this NPS-IB intention (to have a consistent approach) however the assessment criteria itself likely requires amendment to achieve alignment with NPS-IB. **ECO-P3: Criteria for assessing the significance of, and the effects of activities**	Policy intention is in alignment; however, amendment is required (refer below to NPS-IB 3.8): Identification of SNAs is required although it is unclear whether this is the duty of Horizons or territorial authorities. Incorporate NPS- IB SNA assessment requirements into One Plan.

		on, an area of habitat provides assessment criteria. *Habitats* are utilized to manage IB within the One Plan. Provision of an assessment criteria provides consistency.	
Policy 7: SNAs are protected by avoiding or managing adverse effects from new subdivision, use and development.		**RPS- ECO-P2: Regulation of activities affecting IB** outlines Habitats and their significance in managing IB. Outlines *protection* of identified rare, threatened and at-risk habitats, and to *maintain* and *enhance* other at-risk habitats by regulating activities. Potential adverse effects within a habitat must be minimized. RP-ECO-P2 applies decision making principles and applies effects hierarchy.	Good alignment between Policy 7 and RPS-ECO-P2 and RP-ECO-P2. Amendments required to reflect updated NPS-IB wording.
Policy 8: The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.		Could not identify explicit management outside of identified *habitats.* Recommend that 'habitat' is replaced for clear alignment with NPS-IB. SNAs are areas of identified significant habitat for *species.*	SNAs to be incorporated in to One Plan policy framework. *References to Habitat* to be removed or expanded to include biodiversity outside of habitats and SNAs. Decide how integration of Policy 8 will be integrated into One Plan framework. *Refer to above Policy implementation commentary in P2.1*
Policy 9: Certain established activities are provided for within and outside SNAs.		**ECO-P2: Regulation of activities affecting IB** outlines Habitats and their significance in managing IB. Outlines *protection* of identified rare, threatened, and at-risk habitats, and to *maintain* and *enhance* other at-risk habitats by regulating activities. Provides for existing structures and certain activities associated with existing use.	One Plan considers established activities. Intention is aligned, with amendments required to update definitions and remove or expand references to *habitats*.

Policy 10: 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.		Existing infrastructure, structures, cultivation, plantation activities are considered under the Plan. Regional and national contribution recognized (RPS-ECO-P2.5.c.)	One Plan considers wider context in the context of the RMA. Implementation of NPS-IB will achieve this overall.
Policy 11: Geothermal SNAs are protected at a level that reflects their vulnerability, or in accordance with any pre-existing underlying geothermal system classification.		Geothermal ecosystems not identified within One Plan. Note Taupo Volcanic Area identified within NPS-IB which is partially within Horizons geographic area.	Identify geothermal SNAs. Implement geothermal framework if geothermal SNAs are identified.
Policy 12: Indigenous biodiversity is managed within plantation forestry while providing for plantation forestry activities.		NES – PF has been incorporated within the One Plan, however MBIE are due to review. Certain activities are provided for in association with plantation forestry and IB.	Management principles have been applied to enable forestry, and avoid or manage effects on IB.
Policy 13: Restoration of indigenous biodiversity is promoted and provided for.		**ECO-P3: Proactive management of IB** recognizes working in partnership with landowners and other parties with legal interest in the land and relevant consent holders, with the aim of establishing a management plan and incentive programme. Also reflected in **Methods, ECO-M1 – ECO-M8**, which captures wider range of stakeholders to work with. **ECO-P4: Fostering an ethic of stewardship** states RC will equip 'landowners and others' with information to act as good stewards. *Freshwater Plan Change may have some alignment here.*	Carry out audit of incentive programme and management plans to determine effectiveness. Determine if incentive programme and management plans create outcomes aligned with Policy 13. Make changes to incentive programme and management plans if these have not achieved the right outcomes.
Policy 14: Increased indigenous vegetation cover is promoted in		Management and enhancement of habitats is promoted; however, it is unclear if this results in	Include Policy 14 requirements within regional biodiversity strategy (Policy 16).

both urban and non-urban environments.		an increase in cover and may just be good management of existing. Existing policy wording is 'protect' and 'enhancement where appropriate'. Management of IB reads as management of existing, and an increase is potentially not provided for. It is understood that restoration (in-filling) planting is the more common activity, with some additional planting on the periphery of established areas, Further review of internal strategies may be required. Methods within EPS-ECO focus on 'enhancement' and 'protection' while working with landowners, RC holders, DoC etc. 'Enhancement' may include an increase in area.	Prepare regional biodiversity strategy to decide which strategies will be reflected within One Plan framework.
Policy 15: 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 highly mobile fauna is improved.		One Plan focuses on habitats. Limited identification of highly mobile fauna within One Plan. Horizons has carried out work in association with the Freshwater Management Plan on freshwater dependent species.	Identify and evaluate extent and health of highly mobile fauna within the region. Determine appropriate management framework and amend The One Plan accordingly.
Policy 16: Regional biodiversity strategies are developed and implemented to maintain and restore indigenous biodiversity at a landscape scale.		**ECO-P3: Proactive management of IB** recognizes working in partnership with landowners and other parties with legal interest in the land and relevant consent holders, with the aim of establishing a management plan and incentive programme. Also reflected in **Methods, ECO-M1 – ECO-M8**, which captures wider range of stakeholders to work with. However, landscape scale typically wants to capture ecological corridors, and a site-based approach only partially satisfies that.	Establish a representative Biodiversity working group continue to understand/identify ecological corridors within the region. Include relevant NPS-IB terminology, assessment criteria etc. in this work. References to *Habitats* to be replaced or extended. Consider how Outstanding Natural Features and Landscapes shall be

			incorporated within the regional biodiversity strategy/ies.
Policy 17: There is improved information and regular monitoring of indigenous biodiversity.		RPS-ECO-P3 and Methods capture intent to monitor programmes implemented. Monitoring is provided for within the One Plan, however implementation may need to be interrogated to understand alignment with NPS-IB. It is understood from Council staff that terrestrial monitoring is not carried out, while some fish monitoring is carried out as part of SoE work.	Evaluate monitoring activities to understand monitoring effectiveness (i.e., outcomes achieved). Review regularity of monitoring and decide if the status quo is sufficient to achieve NPS-IB outcomes. Consider how to capture '*improved information*'. What does this mean in practical terms for Horizons? Capture current process to identify areas for improvement.

NPS- IB Part 3: Implementation

Part 3 is a non-exhaustive list of implementation methods that must be done to give effect to the Objective and Policies in Part 2

NPS-IB Requirements	Implementation Method (how satisfied)	One Plan Considerations /	HRC Requirements (Next Steps)
3.2 Role of decision-making principles (1) – Local authorities must engage with tangata whenua, people and communities (including landowners) to ensure that the decision-making principles inform, and are given effect to, when implementing this National Policy Statement in their regions and districts.	Implementation Principle	Horizons recognize the need to work collaboratively with stakeholders in the region. One Plan identifies engagement with hapu, iwi (RMIA RMIA) and specifically RPS-ECO: ECO-P3 outlines Council's aim to work in partnership with Landowners, those with legal interest in the land and relevant consent holders in the context of creating arrangements for management plans, as well as within RPS-ECO non-regulatory methods.	Develop Communications and Engagement Plan for One Plan Plan Change (if that is the outcome of this process) and carry out engagement requirement. Ensure good record keeping of engagement.
3.3 **Tangata whenua as partners** (1) – Every Local authority must engage with tangata whenua, people and communities (including landowners), and are given effect to, when	Implementation Principle, Internal Process	RPS-RMIA covers a broader range of topics than IB (e.g., waahi tapu, mauri of water, wastewater). HRC and iwi may have entered into management agreement, the details of which are unknown at this time – RMIA-M1 outlines a	Develop Engagement Plan which *at least meets* 3.3(1)(a)-(f) NPS-IB but aims to create meaningful ongoing relationship, and is in accordance with 3.3(2). Engagement will need to consider all of 3.3.

implementing this National Policy Statement in their regions and districts. (a)… (b)… … … (3.3 (1) to (6) lists particular stages to engage with tangata whenua in respect of NPS-IB implementation, how engagement should be carried out, and matters to consider.		Target 'to develop and implement at least three Memoranda of Partnership by 2010.' NPS-IB is prescriptive in of how Councils are to implement NPS-IB and care will need to be taken to ensure all aspects are covered, even if existing arrangements are in place.	*What this looks like/how much work needs to be done depends on the nature of existing relationships and agreements, it is understood a good relationship has been established through works such as NES-FM and NPS- HPL.*
3.4 Integrated Approach (1) Local authorities must manage indigenous biodiversity and the effects on it from subdivision, use, and development in an integrated way, which means… (a)… (b)… (c)…	Obs, Pols, Rules, internal process	RPS-ECO: ECO-P1 outlines the role of RC to establish a region-wide approach and identifies the roles of RC and TAs. This appears limited in terms of conveying agreed principles and objectives for the region and comes across as reflective of RMA requirements. Agreements between councils may include details which provide alignment with NPS-IB 3.4 *NPS update to One Plan removes some of the explanation on how the One Plan was aligned with a region wide consideration of the landscape.*	Confirm whether there are agreements and management plans in place which address cross-boundary issues and evaluate their effectiveness. Identify agreements/plans/methods which aim to manage cross- boundary IB management and protection, RC application management, and carry out review of this information in context of NPS-IB 3.4. Create an infographic that shows how The One Plan, the Biodiversity Strategy, the RPMS and any environmental enhancement funds Council operate fit together to achieve NPS-IB.
3.5 Social, economic and cultural wellbeing (1) Local authorities must consider: (a)… (b).. … (f)…		One Plan implements the RMA, and therefore aligns with consideration of social, economic, and cultural wellbeing, however specific consideration within IB chapters is recommended.	It is expected that this will be Inherently met by existing processes whilst implementing the full extent of NPS-IB and an RMA compliant One Plan.
3.6 Resilience to Climate Change (1) Local authorities must promote the resilience of indigenous biodiversity to climate change, including at least by:	Pols, Objective, Rules, Internal process	RPS-SRMR 'Planning for climate change' outlines Climate Change as an overarching issue, and outlines RC's proposed approach to adapt to the effects of climate change.	Update RPS-SRMR Planning for Climate Change to reflect role of IB in climate change and conversely promote IB's positive contribution to the management

(a) allowing and supporting the natural adjustment of habitats and ecosystems to the changing climate; and (b) considering the effects of climate change when making decisions on: (i) restoration proposals; and (ii) managing and reducing new and existing biosecurity risks; and (c) maintaining and promoting the enhancement of the connectivity between ecosystems, and between existing and potential habitats, to enable migrations so that species can continue to find viable niches as the climate changes. 2) Local authorities must recognise the role of indigenous biodiversity in mitigating the effects of climate change.		RPS-SRMR further refers to obs, pols and rules within RPS-LF, RPS-EIT, RPS-HAZ.	of climate change. Changes may be inserted within RPS-ECO chapter. For example, impacts of sea level rise on coastal wetlands, impacts of changes in temperature and rainfall on the health of tussock lands etc., increased fire risk.
3.7 Precautionary Approach (1) Local authorities must adopt a precautionary approach toward proposed activities where: (a) the effects on indigenous biodiversity are uncertain, unknown, or little understood; but (b) those effects could cause significant or irreversible damage to indigenous biodiversity.	Rules, internal process	Due to One Plan's focus on *habitats* there is likely misalignment with NPS-IB on management of IB outside of *habitats* though there are other rules within the Lands chapter. RP-ECO Policies outline consent decision making for activities in rare habitats, threatened habitats, and at-risk habitats, and RP ECO ECO-P3 outlines identification guidance of habitats. Specified Activities require a resource consent when carried out within beds of rivers and lakes, within rare habitats, threatened habitats, and at-risk habitats. Activities are either Discretionary or Non-Complying (with some listed exceptions).	Consider whether additional policies or restrictions are required to restrict activities where there are significant uncertainties about the extent of the IB issues and the consequences/effects of the activity on them. Implement a rule framework which reflects a precautionary approach.

		ECO-P2 requires identification of significant indigenous vegetation or habitat of indigenous fauna. This approach is viewed as more relevant for highly mobile fauna species as we tend to know less about where they are and how to protect their habitats. We don't tend to feel the need to talk about precautionary when the values are well understood, and the fauna species stays in one place. The other element here is to apply precautionary when the fauna species is 'nationally critical' or a serious threat classification, again like the long-tailed bat. Typically, we can apply more restrictive plan provisions to a location we can map and is relatively contained; and the converse that we go less restrictive when we apply it to vast expanses.	
3.8 Assessing areas that qualify as SNAs (1) Every **Territorial Authority** must under-take a district wide assessment of the land in its district to identify areas of significant indigenous vegetation or significant habitat of indigenous fauna that qualify as an SNAs. (2) *sets out principles…* *(3) …* *…* *(8)* Appendix 1 is the assessment criteria to be used.	Obs, pols	RPS-ECO includes scene-setting in respect to indigenous habitats and loss of habitat, and the protection of IB via protection, management, and enhancement of habitats. Identifies these as *rare habitat*, *threatened habitat*, or *at-risk habitat*. RP-SCHED6 provides identification of habitats and assessment criteria. RPS-ECO ECO-P1 sets out roles of the RC and Territorial Authorities (outlined above). RPS-ECO ECO-P2 describes rare habitats and threatened habitats under RP-SCHED6 must be recognized as areas of significant indigenous vegetation or significant habitats of indigenous fauna. At-risk habitats assess per	Horizons shall obtain a legal opinion which clarifies NPS-IB and RPS hierarchy – it is arguable that Horizons have taken accountability for mapping SNAs by reserving the function of control of the use of land for the purposes of IB. If NPS-IB over-rides RPS then Horizons will need to work with territorial authorities to determine alternative approaches (e.g., Horizons carry out mapping work on behalf of TAs or vice versa)

		ECO-P3 must be recognized as significant indigenous vegetation or significant habitats of indigenous fauna. RP-ECO ECO-P3 includes assessment criteria for assessing the significance of, and the effects of activities on, an area of habitat. There are differing management policies and rules which apply to at-risk habitats, and rare and threatened habitats. This will require consideration when implementing NPS-IB. That is, if all habitats are identified as SNAs, how does this impact the outcomes Horizons seek to achieve through the different management levels between the different habitat?	Amend RPS-ECO ECO-P1 to set out RC and TA roles in NPS-IB (*if these paragraphs are retained*).
3.10 Managing adverse effects on SNAs of new subdivision, use and development (1) This clause applies to any new subdivision, use, or development that is in, or affects, an SNA except as provided for in *[subclause 6, clauses 3.12,3.18.3.13,3.14]* (2) Each of the following adverse effects on an SNA of any new subdivision, use or development must be avoided, except as provided in clause 3.11: (a) loss of ecosystem representation and extent: (b) disruption of sequences, mosaics, or ecosystem function: (c) fragmentation of SNAs or the loss of buffers or connection to other important habitats or ecosystems: (d) a reduction in the function of the SNA as a buffer or connection to	Pols, obs, rules, internal process, monitoring	RP-ECO: ECO-P1 outlines the requirements for consent to be obtained for specific activities (vegetation clearance, land disturbance, and 'forestry that does not minimize potential adverse effects on those habitats') Provides for several activities, including forestry, to be carried out within an *at-risk habitat* as a Discretionary activity. Subject to other regulations within the One Plan (if applicable to that activity) (RP-ECO: ECO-R1). Several activities, including Forestry, are a non-complying activity when within *rare habitats* and *threatened habitats.* Subject to other regulations within the One Plan (if applicable to that activity) (RP-ECO: ECO-R2). One Plan considers activities such as quarrying, minerals, landfill, existing infrastructure in relation to Natural Inland Wetlands (LF-WETL-P3) and appears in	Carry out audit of resource consents. Evaluate status of habitats to determine if there has been effective management. This will provide an indication of what has been working well and what has not. Consult with DCs to understand what outcomes their consent decisions include/have resulted in for IB. Review rule framework which relates to *habitats* against requirements for SNAs. Review and test rules to determine whether adverse effects on SNAs will be avoided. *Habitat* and SNA criteria assessment required (previously mentioned).

other important habitats or ecosystems: (e) a reduction in the population size or occupancy of Threatened or At Risk (declining) species that use an SNA for any part of their life cycle. (3) Any adverse effects on an SNA of a new subdivision, use, or development that are not referred to in subclause (2), or that occur as a result of the exceptions in clause 3.11, must be managed by applying the effects management hierarchy. (4) *outlines applicant to demonstrate application of effects management hierarchy.* (5) *special circumstances* (6) *exceptions* (7) Every local authority must make or change its policy statements and plans to be consistent with the requirements of 3.10.		alignment with NPS-IB 3.11 Exceptions to clause 3.10(2). The terrestrial environment (RP-ECO) does not appear to have the same policy to the extent as applied to wetlands (i.e., LF-WETL-P3 is more detailed in its exceptions). RP-ECO-P2 provides for assessment within habitats on a case-by-case basis, including considerations of public benefit and significance of infrastructure (limited in application). RP-ECP-R2 lists activities within rare and threatened habitats are non-complying. Some exceptions are regulated by further rules (RP - LF -LW -R9, RP -LF -LW -R21, RP -LF -LW - R32, RP - LF -TUD -R4 6, RP -LF -AWBD -R55, RP - LF -AWBD -R57, RP -LF -AWBD - R58, RP -LF -AWBD -R60 in relation to any existing small dam structure *, RP -LF - AWBD -R6 7 and RP -LF -AWBD -R6 8)	
3.11 Exceptions to Clause 3.10(2) (1)(a) – (5) *provides exceptions based on activity purpose (i.e. specified infrastructure, mineral and aggregate extraction, coal mining, functional need and lack of alternative locations, as well as management requirements for pre-approved developments, developments for the purposes of maintaining or restoring SNA …)*	Rules, internal process, monitoring	One Plan provides good alignment with the exceptions provided within RP-ECO-R1 and RP-ECO-R2.	Amend in alignment with overall NPS-IB implementation as necessary (i.e. definitions).
3.12 SNAs on Māori Land (1) SNAs on specified Māori land must be managed in accordance with clause **3.18**, except that	Implementation Principle, internal process	Refer to NPS-IB 3.18 below.	Map Māori land relative to identified areas of IB first to determine scale of risk.

(a) geothermal SNAs on specified ML must be managed in accordance with 3.13, and (b) SNAs within plantation forests must be managed in accordance with clauses 3.14 (2) To avoid doubt, if any specified Māori land ceases to be used for plantation forestry activities, the land must be managed in accordance with clause 3.18, and not under clause 3.14			Carry out targeted conversations with iwi about whether these areas are SNAs and how iwi would wish to manage them. Determine management approaches in agreement with iwi.
3.13 Geothermal SNAs (1) Every local authority that has a geothermal SNA in its region or district must work in partnership with tangata whenua to make or change its policy statements and plans to include objectives, policies, and methods that, in relation to any new subdivision, use, and development, provide a level of protection of the geothermal SNA that: (a)… … (d)… (2) Any assessment of the vulnerability of a geothermal SNA must be undertaken by a suitably qualified ecologist. (3) In relation to a geothermal SNA, this clause prevails over any other provision of this National Policy Statement that might apply to the SNA, other than clause 3.15 (about established activities affecting SNAs), which applies to geothermal SNAs in the same way as it applies to other SNAs.		One Plan does not include geothermal ecosystems. *NPS-IB – 'ecological district' means in relation to geothermal ecosystems in the Taupo Volcanic Zone, the Taupo Volcanic Zone and for all other areas, the ecological districts as shown in McEwen, W Mary (ed) 1987. Ecological regions and districts of New Zealand. Wellington: Department of Conservation*	Refer to Policy 11. Note hierarchy of NPS-IB 3.13(3).

3.14 Plantation forestry activities (1) except as provided for in subclause (2), the adverse effects of plantation forestry activities in any existing plantation forest on any SNA must be managed in a manner that: (a) maintains IB in the SNA as far as practicable, while (b) providing for plantation forestry activities to continue. (2) Despite clause 3.10, any part of an SNA that is within an area of existing plantation forest that is planted or is intended to be replanted in trees for harvest must be managed over the course of consecutive rotations of production in the manner necessary to maintain the long-term populations of any Threatened or At Risk (declining) species present in the area. **3.14(3)** Every local authority must make or change its policy statements and plans to be consistent with the requirements of this clause.	Policy, Rules	NES-PF has been incorporated into One Plan, however MPI have indicated a review. The NES for Commercial Forestry (CF) came into effect on 3 November 2023. Horizons to determine incorporation approach and timing. RPS-ECO – ECO-P2.4 states potential adverse effects on any *habitat* located within or adjacent to an area of forestry must be minimized, and where the forestry activity does not minimize potential adverse effects, a resource consent is required (RPS-ECO - ECO-P1, ECO-R1, ECO-R2). RP-LF provides of Land and Freshwater obs, pols and rules. Provision is here for vegetation clearance, land disturbance, forestry, and cultivation, and refers to significant natural areas per RP-SCED6 and RP-SCHED7. Rules contained in RP-LF provide for certain forestry activities in proximity to habitats i.e., 5m or 10m from.	Carry out review of the balance between IB protection and providing for plantation forestry within the One Plan to determine it is at least in alignment with NPS-IB. Audit resource consents, monitoring and management plans to determine resource management framework has provided the intended outcome. Decide if implementation of NPS-IB is an opportunity for re-evaluation by Horizons based on audit. Determine how NES-CF (and review of NES-PF) may impact implementation of NES-IB. Review of *habitat* and SNA*s (previously mentioned)*
3.15 Managing adverse effects of established activities on SNAs (1) Local authorities must include objectives, policies, and methods in their policy statements and plans to enable specified established activities, or specified types of established activities, to continue where the effects of the activity on an SNA (including cumulative effects): (a) are no greater in intensity, scale, or character over time than at the commencement date; and	Obs, Pols, Rules, methods, internal process	As covered above, the intention of the One Plan is that there is to protect overall loss, and certain activities are provided for within the plan. RPS-ECO ECO-P2.5.c states Council must allow the maintenance, operation, and upgrade of existing structures, including infrastructure and other physical resources of regional or national importance as identified in RPS-EIT-P1, and 5.d. not unreasonably restrict the existing use of production land where effects	Carry out an audit of resource consent outcomes on *habitats* to determine effective management of adverse effects. Identify if infrastructure works are enabled under the One Plan beyond what is intended in NPS-IB. Evaluate implications of the differences in wording – One Plan ‘similar’ and NPS-IB ‘no greater than’.

(b) do not result in the loss of extent, or degradation of ecological integrity, of an SNA.		on a habitat are the same or similar in character, intensity, and scale. RP-ECO ECO-P2 considers renewable and electricity transmission associated activities as a matter for council consideration of resource consent application.	
3.16 Indigenous Biodiversity (1) If a new subdivision, use, or development is outside an SNA and not on specified Māori land, any significant adverse effects of the new subdivision, use, or development on indigenous biodiversity outside the SNA must be managed by applying the effects management hierarchy. (2) All other adverse effects of any activities that may adversely affect indigenous biodiversity that is outside an SNA (other than indigenous biodiversity on specified Māori land (see clause 3.18)), must be managed to give effect to the objective and policies of this National Policy Statement. (3) Every local authority must make or change its policy statements and plans to be consistent with the requirements of this clause.	Rules, internal process, definitions	RP-ECO ECO-P2.2 applies an effects hierarchy to activities in habitats assessed to be an area of significant indigenous vegetation or a significant habitat of indigenous fauna under RP-ECO-P3. RP-ECO-P3:3. Considers activities inside of an at-risk habitat but assessed not to be within a significant indigenous vegetation or a significant habitat of indigenous fauna. Potentially this provides for areas outside of an SNA which holds IB values.	Mapping of SNA required to understand what is outside of an SNA area. Specified Maori land can be mapped, or title check carried out on case-by-case basis (Horizons to determine appropriate approach).
3.17 Maintenance of improved pasture for farming (1) This clause applies to the maintenance of improved pasture for farming where it may affect an SNA.	Rules, internal process	RPS-ECO-P2 5.d. states TAs not to unreasonably restrict the existing use of production land where the effects of such land use on rate habitat, threatened habitat or at-risk habitat remain the same or similar in character, intensity, and scale.	Provided that SNAs and habitats are in alignment (previous comments), intent between NPS and One Plan is aligned.

(2) Local authorities must allow the maintenance of improved pasture to continue if: …		Cultivation is provided for in respect of RP-ECO-R1 as a Discretionary activity within At-Risk Habitats and is noncomplying when within Rare or threatened habitats. RP-LF provides rules regarding cultivation and provides for certain activities in proximity to habitats i.e., must not occur within 5m or 10m from a Wetland within RP-SCHED6.	
3.18 Specified Māori land (1) work in partnership with tangata whenua and owners of specified Māori land to develop, and include policy statements and plans, policies, and methods 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. (2) Objectives, policies, and methods developed under this clause must: (c) enable new occupation, use, and development of specified Māori land to support the social, cultural, and economic wellbeing of tangata whenua; and (d) enable the provision of new papakāinga, marae and ancillary community facilities, dwellings, and associated infrastructure; and (e) enable alternative approaches to, or locations for, new occupation, use, and development that avoid, minimise, or remedy adverse effects on SNAs and identified taonga on specified Māori land,	Obs, pols, rules, implementation, hierarchy statement	RPS-RMIA, through the Methods outlined, appear to have good alignment with NPS-IB through objectives relation to RMA decision making, identifying Sites of Significance, collaboration on projects and intentions to develop a cultural monitoring framework. As specified Māori land and identified taonga are not identified within the plan, NPS-IB (2) may require specific consideration for the One Plan (enablement provisions in particular).	Work with iwi to prepare a plan for implementing this requirement. Create comm's and engagement plan with tangata whenua and specified Māori landowners (note definition within NPS-IB). Create Project Plan with willing participants. Note: aim is for an ongoing relationship/partnership, not tick-box consultation. Council has established relationship from implementing NPS-HPL work. Council to decide how NPS-IB 3.18 will be integrated into the One Plan - Create separate chapter for Specified Māori land or include within RPS-RMIA or included matters within applicable chapters throughout plan. Implement incentive programme (NPs-IB 3.18(5) and existing incentives plan. Refer also to Policy 16. Determine if one incentive plan for all is sufficient.

and enable options for offsetting and compensation; and (f) recognise and be responsive to the fact that there may be no or limited alternative locations for tangata whenua to occupy, use, and develop their lands; and (g) recognise that there are circumstances where development will prevail over indigenous biodiversity; and (h) recognise and be responsive to any recognised historical barriers tangata whenua have faced in occupying, using, and developing their ancestral lands. (3) The decision-maker on any resource consent application must, when considering matters affecting specified Māori land, take into account all the matters in subclause (2). (4) Subclauses (2) and (3) do not apply to specified Māori land to the extent that the land is subject to full or partial legal protection under legislation for the purpose of protecting indigenous biodiversity on that land (such as, for example protection provided by covenants or land classifications under the Reserves Act 1977, the Conservation Act 1987, or the National Parks Act 1980). (5) Local authorities must consider and realise opportunities to			

provide incentives for the protection and maintenance of indigenous biodiversity, and the protection of SNAs and identified taonga, on specified Māori land. (6) Policy statements and plans developed for the purpose of this clause do not prevail over any management strategies or plans developed in the legislation referred to in paragraphs (e) and (f) of the definition of specified Māori land. (7) …			
3.19 Acknowledged and identified taonga (1) Every **TA** mush work in partnership with tangata whenua of any rohe in their district, using an agreed process, to determine the indigenous species, populations, and ecosystems in that rohe that are taonga (and these are **acknowledged taonga).** (2) Local authorities must recognise that tangata whenua have the right not to determine the indigenous species, populations and ecosystems in their rohe that are taonga, and to choose the level of detail at which any acknowledged taonga, or their location or values, are described. (3) describes how **identified taonga** are to be described and mapped within District Plans.		RMIA provides good level of alignment with 3.19. As previous mention RMIA is not integrated within IB chapter.	Address this matter in the broader legal opinion about primacy of RPS reservation of control vs NPS-IB direction. Based on the outcomes of that opinion engagement with DC and tangata whenua to understand extent of management expectations and whether additional processes are required. Determine timing with DC's and map within Horizons NPS-IB roadmap.

(4) Local authorities must work in partnership with tangata whenua to protect both acknowledged and identified taonga as far as practicable and to involve tangata whenua (to the extent that they wish to be involved) in the management of identified taonga. (5) Identified taonga located on specified Māori land must be managed under clause 3.18, but if identified taonga are located within an SNA that is not on specified Māori land: (a) the identified taonga must be managed in a manner consistent with the management approach applying to the SNA; and (b) the matters listed in subclause (6) must be taken into account in managing the SNA. (6) In managing effects on identified taonga, local authorities must recognise that the possible adverse effects on identified taonga include effects on: (a) the mauri of the taonga: (b) the values of the taonga as identified by tangata whenua: the historical, cultural, and spiritual relationship of tangata whenua with the taonga, as identified by tangata whenua.			

3.20 Specified highly mobile fauna (1) Where information about areas used by specified highly mobile fauna is available, every regional council must record areas outside SNAs that are highly mobile fauna areas, by working together with tangata whenua (in the manner required by clause 3.3), any potentially affected landowners, territorial authorities in its region, and the Department of Conservation. (2) If it will help manage adverse effects on specified highly mobile fauna, regional councils must include in their regional policy statements (where practicable) a map and description of each highly mobile fauna area in the region. (3) Local authorities must include objectives, policies, or methods in their policy statements and plans for managing the adverse effects of new subdivision, use, and development on highly mobile fauna areas, in order to maintain viable populations of specified highly mobile fauna across their natural range. (4) Local authorities must provide information to their communities about: (c) highly mobile fauna and their habitats; and	Obs, Pols or Methods	Appears to be limited application within the One Plan. The *habitats* focus acknowledges fauna, and only within the description of the scheduled sites is there mention of species. For example, RPS-SCHED 7: Regionally Outstanding Natural Features and Landscapes identify locations/areas and note ecological significance as a habitat for certain fauna (e.g., whio). One Plan RP-Land (LF) chapter includes rules which manages activities in and around Outstanding Natural Features.	Identify Highly Mobile Fauna within the Region, and their ecological corridors. Identify regional partners with a role in managing highly mobile fauna e.g., DoC, district councils, nature trusts, iwi etc. Create communication engagement and working plan with regional partners to establish collaborative approach. Develop implementation plan for management of highly mobile species. Review cross-over or implications for implementation of NPS-IB and overlap of areas with Outstanding Natural Features, and what this may mean for One Plan Land (LF) Chapter.

(d) best practice techniques for managing adverse effects on any specified highly mobile fauna and their habitats in their regions and districts.			
3.21 Restoration (1) Local authorities must include objectives, policies, and methods in their policy statements and plans to promote the restoration of indigenous biodiversity, including through reconstruction of areas. (3) Local authorities must consider providing incentives for restoration in priority areas referred to in subclause (2), and in particular where those areas are on specified Māori land, in recognition of the opportunity cost of maintaining indigenous biodiversity on that land. (4) In relation to activities in areas prioritised for restoration, local authorities must consider: (a) requiring conditions for restoration or enhancement on resource consents that are new or being reviewed; and (b) recommending conditions on any new designations.	Obs, Pols, rules	One Plan promotes restoration through active management, working with landowners and economic assistance. Schedule F includes list of Habitats in decline, as an area of significant indigenous vegetation or significant habitat of IB, which are afforded a high level of protections. Active Management of habitats are proactively managed in collaboration with landowners. Policy 6-2(c)promotes restoration or enhancement of outstanding natural features and landscapes. Council refers toa *Top 100* wetlands and Top 200 bush remnants programme which aimed to encourage, promote and assist with restoration of these wetlands and bush remnants within 10 years. i.e., RPS-ECO-M1, RPS-ECO-M2. Council staff have advised that this programme has been replaced by a programme called *Priority Habitats.* ECO-R1 (Discretionary activity rule) and ECO-R2 (non-complying activity rule) provides for activities such as vegetation clearance, discharge of water, land disturbance etc. (as listed within the rule) to be carried out if they are '*for the purposes of protecting or enhancing the habitat, including the control of pest animals and pest plants.*'	In alignment with 3.18(5), engage with councils and develop incentive programme, or audit any existing incentive programme to ensure it is achieving the intended outcomes. Evaluate how existing incentives and encouragement has worked and what the results have been. Create monitoring framework to determine how well consent conditions provide for restoration. Audit resource consent conditions which provided for restoration and check against those projects to identify degree of effectiveness. Consider a monitoring requirement for those activities allowed under ECO-RE and ECO-R2 in relation to habitat enhancing works.

3.22 Increasing indigenous vegetation cover (1) Every regional council must assess the percentage of indigenous vegetation cover in: (a) each of its urban environments; and (b) its non-urban environments. (3) Regional councils must: (a) set a target of at least 10% indigenous vegetation cover for any urban or non-urban environment that has less than 10% cover of indigenous vegetation; and (b) consider, in consultation with tangata whenua and territorial authorities, setting higher targets for urban and non-urban environments that already have at least 10% coverage of indigenous vegetation; and (c)include any indigenous vegetation cover targets in their regional policy statements. (4) Local authorities must promote the increase of indigenous vegetation cover in their regions and districts through objectives, policies, and methods in their policy statements and plans: (a) having regard to any targets set under subclause (3) by regional councils; and (b) giving priority to all the following: (i) areas referred to in clause 3.21(2):	Obs, pols, rules? Internal projects (i.e. council as landowner), Anticipated Environmental Results, Methods	The One Plan indicates an understanding of the percentages of IB in terms of its wetlands and bus remnants at the time of writing (RPS-ECO Background). Unsure if by way of active management, monitoring or through RC consent processes that impacts on habitats and IB are recorded. Specified targets not set within One Plan, though percentage of original forest cover and wetland habitats remaining were specified at the time of writing. Note also the Anticipated Environmental Outcomes RPS-ECO-AER1 and AER2 – would monitoring records relating to this help to identify gaps between regions vegetation coverage and NPS-IB 3.22? Protection, management, and enhancement is promoted within the One Plan (RPS-ECO-O1, RPS-ECO-P3, RPS-ECO-P4, ECO-M1 – ECO-M4, ECO-M6-ECO-M8 however these do not read to promote an *increase* of IB cover. RP-ECO-P2. 4 provides for an offset of net IB gain where an activity cannot avoid, remedy, or mitigate the more than minor effects of an activity on IB within a habitat, however this should be a last resort consenting pathway and not deemed as 'promoting' an increase to IB.	Identify current area of urban and non-urban IB cover within the region. This will include a GIS/aerial mapping project or similar. Once IB coverage is known, determine what percentages are required to meet NPS-IB 3.22. Decide if the minimum percentages provided in NPS-IB are sufficient or consider higher targets. Test this through targeted and public engagement. Develop long term strategy and implementation (depending on % targets and current cover as identified in 3.22(1) NPS-IB). This could be reflected as environmental enhancement overlays for erosion prone land, streams and other terrestrial environments the region wishes to see thrive. Determine a methodology or approach i.e., this link with an incentive programme to promote increased cover along an ecological corridor or near existing larger IB areas. *Note the use of IB here instead of SNAs, within the NPS-IB.*

(ii) ensuring indigenous species richness appropriate to the ecosystem: (iii) restoration at a landscape scale across the region: using species, and seed from species, that are local to the area.			
3.23 Regional biodiversity strategies (1) Every regional council must prepare a regional biodiversity strategy that complies with Appendix 5 in collaboration with territorial authorities, tangata whenua, communities and other identified stakeholders. (2) Local authorities must have regard to the relevant regional biodiversity strategy when developing restoration objectives, policies, and methods for inclusion in regional policy statements and plans.	Policy, Implementation	Unable to determine from the One Plan explicitly what strategies are being implemented, however likely that there are strategies which underpin Methods in RPS-ECO, and in relation to the goals set out in RPS-ECO-AER1 and 2 and relating to the region's Top 10- wetlands and Top 200 bush remnants, and ECO-P3 seeks to establish management plans for identified sites by 2016.	Audit One Plan Methods to understand what practical actions are carried out, and to determine success of methods. Prepare Regional Biodiversity Strategy: - Evaluate requirements of Appendix 5 NPS-IB. - Consider relevant stakeholder involvement (identification). - Create working group with targeted timeline. - Biodiversity Strategy reflected within One Plan obs, pols, methods to ensure appropriate integration.
3.24 Information Requirements (1) Every local authority must make or change its policy statements and plans to require that, in relation to an application for a resource consent for an activity that would have more than minor adverse effects on indigenous biodiversity, the application is not considered unless it includes a report that: (a) is prepared by a suitably qualified ecologist and as required, any other person with suitable	Pols, rules, implementation	Effects hierarchy is applied in consideration of more than minor adverse effects (RP-ECO, ECO-P2(2)) and effectively provides a pathway for consideration of activities. Activities are either Discretionary or non-complying. Unsure of internal decision-making considerations and requirements, RP-ECO-P2 set out factors for Council decision making to have regard to when considering a resource consent, and applications and consent conditions are on a case-by-case basis.	Amend RP-ECO to reflect NPS-IB 3.24.

expertise, such as someone with expertise in mātauranga Māori; and (b) complies with subclause (2); and (c) is commensurate with the scale and significance (to indigenous biodiversity) of the proposal. Subclause (2) sets out report requirements.			
3.25 Monitoring by regional councils (1) Regional councils must work with tangata whenua, territorial authorities, relevant agencies and other relevant stakeholders to develop a monitoring plan for indigenous biodiversity in their regions and each of their districts.	Policies, Implementation	Non-regulatory Methods ECO-M1 – ECO-M4 include monitoring as part of the identified action plans. RMIA-I5 outline that monitoring is an issue for iwi and is insufficient at times. RMIA-P1(4) provides for development of hapu and iwi cultural monitoring plans, RMIA-M5, RMIA-M9, and RMIA-M10 implements iwi and hapu involvement with monitoring resource management initiatives, resource consents and natural and physical resources. Note Part IV – Evaluation and Monitoring of One Plan references this chapter does not give full effect to NPS.	RMIA-M9 includes *Implementation of a cultural monitoring framework for natural and physical resources* by June 2011.* Amend existing monitoring plan and framework to meet NPS-IB key intent and requirements (for example, no overall loss, geothermal ecology health check, mobile fauna monitoring etc). Horizons complete the evaluation work which is currently being carried out. Use this information to understand what is required to monitor IB under NPS-IB. IB will have a wider reach than *habitats* within One Plan.

Appendix Two - Break down of activities undertaken by HRC staff and approximate costs (2020)[142]

Activity	Indicative cost	Explanatory notes	Current annual target / capacity
Fencing[143] (riparian – Freshwater team)	$4 – 30 per metre. *Horizons contributes advice and 50% of fencing cost.*	Depends on type of fencing, location, soils, terrain, access to site, machinery required, number of angles.	110-140 km per year (Freshwater team);
Fencing (retiring land – Land Management team)	ca $3,500 per ha for riparian retirement; ca $900 per ha for bush retirement *Horizons contributes advice and 30-50% of fencing cost.*		120 km per year (Land Management)
Riparian planting	$6 – 6.50 per plant, in the ground. *Horizons contributes 30-50% of the cost, including the plant, pre-planting spot spray, planting and one release spray.*	Depends on size and species of plant; plants are also significantly lower in cost in Tararua. Additional costs for the landowner can include pest management.	90,000-150,000 plants per year (equates to approx. area 36-60 ha/per year[144], across approx. 40 sites per FMO - Freshwater team);
Fish pass	$7,000-15,000 for a rock and concrete fish pass. *Broader range of options would cost between $10 and $100,000.* *Horizons contributes up to 100%*	Depends on design and construction. There is a regulatory requirement for owners of structure to make them fish passable; however, Horizons currently offers advice (and also design and oversight of works). Currently there are approx. 240 identified sites needing a remedy.	7 per year (4 in the Manawatū catchment).
Sediment trap[145]	$15,000-20,000 when consent not required; $20,000-30,000 if consent needed. *Horizons contributes 30-50% of the cost.* $500,000 for Arawhata catchment (4[8?] ha)	Includes construction of dam, residual flow pipe, fencing at $18/m and planting (flax, Manuka). Larger (consented) design may include a fish pass.[146] ca $350,000 for design and construction (including consents / legal costs[147]); ca $150,000 to purchase land	Could supervise / provide advice for 40-50 farm-scale projects per year (4-5 per LMO), if there was sufficient funding and demand.

[142] Based on investigation and analysis undertaken by Pen Tucker, 2020
[143] Ferguson, pers. com. 23 January 2020. Fencing costs are split roughly half and half between the cost of labour and cost of materials; Land Management team uses estimated cost of $18 per m (Cooper, pers. com. 4 Feb 2020).
[144] Based on 2x2 m spacing – Ferguson.
[145] A very basic sediment trap can be constructed for ca$500 – consists of an earth dam, no planting or fencing. These are vulnerable to damage by stock and can then collapse, releasing the accumulated sediment. This option would not be supported by Horizons. (Grant McLaren, pers. com. 3 Feb. 2020; Grant Cooper, Malcolm Todd, pers. com. 4 Feb 2020).
[146] The eventual outcome is essentially a constructed wetland, although the landowner may have intended it as a 'duck pond'.
[147] These were relatively high due to the location of the project and a number of long-standing issues in that catchment.

Constructed wetland	Similar to sediment trap, with additional planting costs. *Horizons contributes 30-50% of the cost.*	Same basic method as sediment traps, with more plants and less water. Costs could increase significantly for projects at a bigger scale[148]; for example, if land had to be purchased.	
Regulation (consenting and consents monitoring)	$885-1725 deposit for non-notified consent application for discharge, land use, land disturbance, bridges or culverts; $7,500 or $20,000 additional deposit for limited or fully notified application. Plus any additional actual and reasonable costs. ca$112,000 per year for a Consents Planner & ca$132,000 for a Senior; ca$125,000 for a Consents Monitoring Officer and $140,000 for a Senior. *Applicant is liable for full cost of consents.*	Includes consents for intensive farming land uses; land disturbance (to create a wetland or bioreactor, for example; depending on area and/or proximity to waterway); discharges to land and water; stock crossings. A proportion of staff costs is offset by charging for consent applications and monitoring (approx. 50% for consents planners; more variable for monitoring officers); this is not reflected in these estimates. Planning consultants are routinely contracted to provide additional capacity, or expertise for complex applications and processes.	Consent numbers are demand driven and processing aims to occur within statutory timeframes. Annually, approx. 1500 consents granted (including 5-10 publicly notified, multi-consent applications) Consents monitoring uses a risk-based approach, and responds if there are complaints about unmonitored consented and permitted activities.
Sustainable land use	$6.51 million to fund SLUI, Region & Coast, and nursery activities. *This is the gross cost, which is offset by $1.733m government funding, and up to 50% of implementation costs recovered from farmers.*	See also costs for individual measures (such as advice and education, whole farm plans, fencing; riparian planting; sediment traps, constructed wetlands) for further detail of how this budget is spent.	20 staff with a target of 20,000 ha of new whole farm plans and 3,500 ha of works. In 2020, expecting to complete 6,000 ha of works including some large one-off areas; this is the limit of capacity and is probably not sustainable[149].
Whole Farm Plan	ca $10,000 each for an average farm (550 ha). *Fully funded by SLUI programme.*	Includes staff time to get farmer on board, preparation, and for administration, and for mapping by contractor ($10 / ha)	Target is 20,000 ha (i.e., ca 36 farms)

[148] Construction costs for a 0.75 ha constructed wetland in the Wairarapa in 2013 were at least $55,000, not including design, consenting and potential lost capital value (Praat et. al., 2015, p. 175).
[149] G Cooper, personal communication, 4 February 2020.

Planting erosion-prone land	ca$1,200-1,500 per ha for afforestation (radiata pine); $20-25 per poplar pole (ca $800 per ha).	The cost to establish native forest is estimated to be at least double the cost per hectare to establish pine forest.	ca 1.4 million trees per year (includes target of 30,000 poplar and willow poles)
Advice and education	ca$140,000 per year for a Land Management Officer or Environmental Management Officer, or Rural Industry Advisor (including overheads and vehicle).		Includes engagement through events
Environmental grants	*Fund 30-100% of improvement works, depending on type of grant and what it will deliver.*	See activities above for further detail.	

horizons.govt.nz

24 hour freephone 0508 800 800
fax 06 952 2929 | **email** help@horizons.govt.nz
Private Bag 11025, Manawatu Mail Centre, Palmerston North 4442