

APPENDIX D: ASSESSMENT OF GIVING EFFECT TO THE NPS-IB THROUGH THE ECOSYSTEMS AND INDIGENOUS BIODIVERSITY CHAPTER IN THE PROPOSED KAIPARA DISTRICT PLAN – 2026

Purpose

- This appendix provides a summary assessment of how the Ecosystem and Indigenous Biodiversity chapter (**the ECO Chapter**) in the Kaipara Proposed District Plan (**PDP**) should give effect to certain provisions in the National Policy Statement for Indigenous Biodiversity 2023 (**NPS-IB**).

Statutory context

- The NPS-IB must be given effect to “*as soon as reasonably practicable*”¹. However, the Resource Management (Freshwater and Other Matters) Amendment Act 2024 (**the RMA Amendment Act**) amended Part 4 of the NPS-IB so that local authorities are not required to notify any changes to plans to give effect to the Significant Natural Areas (**SNA**) related provisions in the NPS-IB (subpart 2 of Part 3) until 31 December 2030 and the SNA mapping requirements have been paused for 3-years. .
- Part 3 of the NPS-IB sets out a “*non-exhaustive lists of things that must be done to give effect to*” the NPS-IB. Many of these NPS-IB provisions are highly directive and generally leave little flexibility to choose how they are implemented.
- The scope of the PDP includes an indigenous biodiversity chapter and there are numerous submission points seeking alignment of the PDP with the NPS-IB. As such, there is scope within submissions to recommend amendments to the ECO Chapter to give effect to the NPS-IB.

Key principles guiding where it is not appropriate or practicable to give effect to the NPS-IB

I recommend the ECO Chapter in the PDP **does not** give effect to provisions in the NPS-IB when any of the following apply:

- It would involve significant amendments to the notified ECO Chapter or giving effect to any matters in the NPS-IB that are not already fully, or partially, addressed by the provisions ECO Chapter as notified (e.g. resilience to climate change). This is because I consider that a future planning process (under the RMA or new planning system) will provide a fairer opportunity for interested persons to comment and participate in the process.
- The provisions relate to SNAs as these areas need to be mapped in district plans before the effects management provisions in the NPS-IB apply and those requirements have been paused.
- It would require further engagement and partnership with tangata whenua and landowners or require further technical/ecological work (e.g. identifying highly mobile fauna areas) through the PDP. These need to be given effect through a future planning process (under the RMA or new planning system).

NPS-IB Objective/Policy	NPS-IB Part 3 — Implementation Clause	Relevant provisions in Ecosystems and Indigenous Biodiversity chapter (as notified)	Recommendations to give effect to NPS-IB provision through PDP or future plan change/other process under new legislation
<p>(1) <i>The objective of this National Policy Statement is:</i></p> <p>(a) <i>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</i></p> <p>(b) <i>to achieve this:</i></p> <p>(i) <i>through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and</i></p> <p>(ii) <i>by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and</i></p>	<p>N/A – the NPS-IB objective has no specific Part 3 implementation clause as all policies and implementation clauses of the NPS-IB give effect to the objective.</p>	<p>Objectives ECO-O1, ECO-O2, ECO-O3 and ECO-O4 are strongly aligned with the NPS-IB objective, which includes several related elements. In particular:</p> <ul style="list-style-type: none"> ECO-O1 seeks to protect significant indigenous vegetation and significant habitats of indigenous fauna. ECO-O2 seeks to maintain indigenous biodiversity while providing for the social, economic, and cultural wellbeing of people and communities. ECO-O3 promotes and enables the restoration of indigenous biodiversity. ECO-O4 seeks to recognise the role of landowners as stewards in protecting, maintaining and restoring indigenous biodiversity. 	<p>Overall, I consider that objectives in the ECO chapter are strongly aligned with the NPS-IB objective. However, I have identified opportunities to better align the ECO chapter objectives with the NPS-IB objective:</p> <ul style="list-style-type: none"> It is appropriate to refer to protecting significant indigenous vegetation and significant habitats of indigenous fauna <u>for current and future generations</u> in ECO-O1. This will better give effect to the NPS-IB objective which directs that protection of these environments must be achieved while providing for the social, economic, and cultural wellbeing of people and communities now and in the future (emphasis added). It is appropriate to recognise the role of tangata whenua as kaitiaki of indigenous biodiversity alongside recognising landowners as stewards in ECO-O4. I do not agree that the direction from (1)(a) of the objective to maintain indigenous biodiversity so that there is “at least no overall loss” should be introduced into the ECO chapter objectives (or subsequent policies). My understanding is that this direction to achieve no overall loss in indigenous biodiversity applies at national level, not necessarily at the regional, district or consent level. <p>Recommendation: Retain ECO-O1 to ECO-O4 (subject to amendments discussed above) which collectively give effect to the NPS-IB objective.</p>

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

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<p>(iii) by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and</p> <p>(iv) while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.</p>			
<p>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.</p>	<p>Clause 3.2: Role of decision-making principles</p>	<p>The ECO Chapter does not include any “<i>decision-making principles</i>” as defined in Clause 1.5 of the NPS-IB. There are numerous provisions relating to the principles of the Treaty of Waitangi in the PDP, including in the Tangata Whenua/Mana Whenua and Māori Purpose Zone chapters and there are some provisions that take into account Treaty principles in the ECO Chapter as notified:</p> <ul style="list-style-type: none"> • ECO-O2 recognises that adverse effects on indigenous biodiversity must be managed in a way that provides for cultural well-being. • ECO-P1 and ECO-P2 direct how adverse effects on indigenous species, habitats and ecosystems that are important for traditional or cultural purposes should be managed within and outside the coastal environment. • ECO-P3 directs that significant indigenous vegetation and significant habitat of indigenous fauna should be protected, and indigenous biodiversity maintained, in a way that enables land to be used and developed to support the cultural well-being of people and communities. • ECO-R1.1.g provides for the clearance of indigenous vegetation if it is provided for in a Ngā Whenua Rahui Kawenata (covenant imposed by Māori to protect indigenous biodiversity on Māori land). 	<p>I consider that amendments to the ECO Chapter could be made to better give effect to Policy 1 of the NPS-IB with respect to the principles of the Treaty of Waitangi. More specific acknowledgement of tangata whenua’s role as kaitiaki of indigenous biodiversity should be included in the objectives and policies of the ECO Chapter (specifically in ECO-O4 and ECO-P4).</p> <p>With respect to decision-making principles, clause 3.2 of the NPS-IB directs that local authorities give effect to the “<i>decision-making principles</i>” when implementing the NPS-IB in their regions and districts. This is a procedural requirement which cannot practicably be given effect to through the PDP. Therefore, I recommend that the NPS-IB “<i>decision-making principles</i>” are given effect to through the future plan change or other process under new legislation to give effect to the NPS-IB in full.</p> <p>Recommendation: Policy 1 and Clause 3.2 in the NPS-IB are partially given effect to through amendments to ECO chapter provisions discussed above to better recognise Treaty principles, followed by future plan change to give effect to the NPS-IB or other planning process under new legislation.</p>
<p>Policy 2: Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe.</p>	<p>Clause 3.3: Tangata whenua as partners</p>	<p>No specific recognition of the role of tangata whenua as kaitiaki or partners in managing indigenous biodiversity in the ECO chapter.</p>	<p>Clause 3.3 sets out detailed direction to involve tangata whenua as partners in all aspects of managing indigenous biodiversity, including when developing plan provisions to give effect to the NPS-IB. Clause 3.3 also include specific direction relating to early and meaningful engagement with tangata whenua, providing opportunities for tangata whenua to exercise kaitiakitanga, investigate joint management arrangements etc. This is a procedural requirement, and it is not practicable or appropriate to give effect to Clause 3.3 in full through the PDP, as this requires a partnership approach and consideration of broader arrangements that sit outside the PDP.</p> <p>However, it is practicable and appropriate to give effect to the direction relating to the role of tangata whenua as kaitiaki in the ECO Chapter through amendments to ECO-O4 and ECO-P4, as discussed above.</p>

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			<p>Recommendation: Amend ECO-O4 and ECO-P4 to partly give effect to Clause 3.3(2) in the NPS-IB and give effect to Policy 2 and Clause 3.3 in full through a future plan change or other planning process under new legislation.</p>
	<p>Clause 3.18: Māori lands</p>	<p>There are specific provisions relating to the use and development of Māori land in the Māori Purpose Zone chapter of the PDP. However, the only ECO Chapter provision relating to Māori land is ECO-R1.1.g, which provides for the clearance of indigenous vegetation if it is provided for in a Ngā Whenua Rahui Kawenata (covenant imposed by Māori to protect indigenous biodiversity on Māori land).</p>	<p>Clause 3.19 requires local authorities to work in partnership with tangata whenua and owners of “specified Māori land” to develop provisions that, to the extent practicable: (a) maintain and restore indigenous biodiversity on specified Māori land; and (b) protect SNAs and identified taonga on specified Māori land. This partnership approach is a procedural requirement that will take time to develop and is best done in tandem with the process to identify SNAs based on the principles of partnership and transparency. Therefore, it is not practicable or appropriate to give effect to Clause 3.19 in the NPS-IB through the PDP.</p> <p>Recommendation: Clause 3.18 in the NPS-IB is given effect to through a future plan change or other process under new legislation. This will allow a partnership approach with tangata whenua to be implemented as directed by the NPS-IB.</p>
	<p>Clause 3.19: Identified taonga</p>	<p>N/A – there are no specific provisions in the ECO Chapter relating to the identification of taonga species.</p>	<p>Clause 3.19 prescribes a specific process for territorial authorities to work in partnership with tangata whenua to identify taonga species, populations and ecosystems. This is a process that will take time to develop and requires partnership with tangata whenua. Therefore, it is not practicable or appropriate to give effect to Clause 3.19 through the PDP.</p> <p>Recommendation: Clause 3.19 in the NPS-IB is given effect to through a future plan change or other process under new legislation. This will allow a partnership approach with tangata whenua to be implemented as directed by the NPS-IB.</p>
<p>Policy 3: A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.</p>	<p>Clause 3.7: Precautionary approach</p>	<p>N/A – there are no specific provisions in the ECO Chapter relating to a precautionary approach.</p>	<p>Clause 3.7 does not specifically require local authorities to make changes to plans – the direction is simply to adopt a precautionary approach when there is uncertainty about the effects on indigenous biodiversity, but these effects could potentially be significant. The ECO Chapter as notified does not direct that decision makers take a precautionary approach and, given the likelihood of significant changes to the NPS-IB under upcoming new legislation, I do not recommend giving effect to additional concepts in the NPS-IB not already addressed in the ECO Chapter.</p> <p>Recommendation: Policy 3 and Clause 3.7 are given effect to through a future plan change or other process under new legislation. This will allow all parties to have input into how the precautionary approach is used in indigenous biodiversity management.</p>
<p>Policy 4: Indigenous biodiversity is managed to promote resilience to the effects of climate change.</p>	<p>Clause 3.6: Resilience to climate change</p>	<p>N/A – the ECO Chapter does not include any provisions specific to promoting the resilience of indigenous biodiversity to climate change.</p>	<p>Clause 3.6 does not specifically require local authorities to make changes to plans – the direction sets out actions local authorities should take to promote resilience of indigenous biodiversity to climate change and recognise the role of indigenous biodiversity in mitigating climate change. The ECO Chapter as notified does not consider how to promote resilience of indigenous biodiversity to the effects of climate change. Given the likelihood of significant changes to the NPS-IB under upcoming new legislation, I do not recommend giving effect to additional concepts in the NPS-IB not already addressed in the ECO Chapter.</p> <p>Recommendation: Policy 4 and Clause 3.6 are given effect to through a future plan change or other process under new legislation. This will allow all parties to have input into how resilience of indigenous biodiversity to climate change will be promoted.</p>
<p>Policy 5: Indigenous biodiversity is managed in an integrated way, within and across administrative boundaries.</p>	<p>Clause 3.4: Integrated approach</p>	<p>There are no provisions in the ECO Chapter that relate specifically to the integrated management of indigenous biodiversity. However, the PDP takes an integrated management approach to the use, development or protection of land and associated natural and physical resources. This is reflected in the Statutory Context section in the PDP, which recognises that one of Council’s functions under section 31</p>	<p>Clause 3.4 in the NPS-IB does not require local authorities to make changes to policy statements and plans to give effect to the provision – rather the direction is to manage indigenous biodiversity in an integrated way by setting out what this means in practice (e.g. recognising the interconnectedness of the whole environment and interactions between the terrestrial environment, freshwater and the coastal marine areas).</p>

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		of the RMA is achieving the “ <i>integrated management of the effects of the use, development, or protection of land and associated natural and physical resources</i> ”. The same section also states that “ <i>the plan gives effect to, has regard to (or is not inconsistent with) various related documents to achieve the integrated management of natural and physical resources as directed by the Act.</i> ”	The specific direction in Clause 3.4 is also more focused on how local authorities achieve integrated management across different environments and administrative boundaries rather than the development of specific plan provisions. On this basis, I do not consider that the PDP needs to include specific provisions to give effect to Policy 5 and Clause 3.4 at this point. Recommendation: No amendments to the ECO Chapter but consider whether specific direction relating to integrated management of indigenous biodiversity is required as part of a future plan change or other process under new legislation.
Policy 6: Significant indigenous vegetation and significant habitats of indigenous fauna are identified as significant natural areas (SNAs) using a consistent approach.	Clause 3.8: Assessing areas that qualify as significant natural areas Clause 3.9: Identifying SNAs in district plans	N/A – the ECO Chapter does not include provisions that assess or require identification of areas as SNA.	The NPS-IB provisions relating to SNA mapping are detailed and directive. Giving effect to these provisions will require a robust approach to district-wide SNA mapping that follows a transparent, accurate (physical inspection where practicable) and collaborative process (engagement with landowners and tangata whenua). It is not practicable or appropriate to give effect to these requirements through the PDP for the reasons outlined in the section 42A report. Recommendation: The NPS-IB provisions relating to SNA mapping are given effect to through a future plan change or other process under new legislation.
Policy 7: SNAs are protected by avoiding and managing adverse effects from new subdivision, use and development.	Clause 3.10: Managing adverse effects on SNAs of new subdivision, use, and development Clause 3.11: Exceptions to clause 3.10(2)	N/A – the ECO Chapter does not include provisions that manage the adverse effects on SNAs of new subdivision, use and development.	It is not appropriate or practicable for the PDP to give effect to NPS-IB requirements relating to the protection of SNAs. This is because these provisions are premised on SNAs first being identified in district plans (based on the NPS-IB definition of SNAs). Further, my understanding is that the NPS-IB provisions relating to SNA mapping and subsequent protection of those areas in Part 3, sub-part 2 of the NPS-IB are intended to be implemented together (for a range of reasons). Accordingly, these provisions must be given effect to through a future plan change or other process under new legislation. Recommendation: Give effect to the NPS-IB provisions relating to the protection of SNAs through a future plan change or other process under new legislation.
Policy 8: The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.	Clause 3.16: Indigenous biodiversity outside SNAs	The ECO Chapter does not differentiate between indigenous biodiversity “within” or “outside” SNAs as the PDP does not identify or map SNAs.	The direction in Policy 8 and Clause 3.16 applies “outside SNAs”. It could therefore be argued that it should apply throughout the Kaipara District as the PDP does not include any SNAs (as defined in the NPS-IB). However, this would create a tension with NZCPS Policy 11 and Policy 4.4.1 in the RPS which direct where certain adverse effects need to be avoided and where significant adverse effects need to be avoided. ECO-P1 and ECO-P2 directly give effect to Policy 4.4.1 of the RPS. In my view, it would add unnecessary complexity introducing the effects management hierarchy from the NPS-IB into the PDP at this point of time as ECO-P1 and ECO-P2 already address the key effects on indigenous biodiversity within and outside the coastal environment that need to be avoided, remedied and mitigated consistent with Policy 4.4.1 in the RPS.. Recommendation: Give effect to Policy 8 and Clause 3.16 regarding maintenance of indigenous biodiversity outside of SNAs through a future plan change or other process under new legislation
Policy 9: Certain established activities are provided for within and outside SNAs.	Clause 3.15: Managing adverse effects of established activities affecting SNAs Clause 3.17: Maintenance of improved pasture	ECO-P3 in the ECO Chapter provides direction relating to existing primary production activities and existing structures (including infrastructure). ECO-R1 also enables indigenous vegetation clearance associated with certain existing, lawfully established activities. The ECO Chapter does not specifically address the maintenance of improved pasture.	For the same reasons as outlined above, it is not appropriate or practicable in my view for the PDP to give effect to NPS-IB requirements relating to the protection of the ecological integrity and extent of SNAs from existing activities and the maintenance of improved pasture for farming where this may affect a SNA. This is because the SNAs effects management provisions in the NPS-IB are premised on SNAs first being identified in district plans. This will require a separate plan change or other process under new legislation where the NPS-IB provisions relating to SNA mapping and protection of those areas can be implemented together. Recommendation: The NPS-IB provisions relating to the protection of SNAs from existing activities and improved pasture for farming are given effect to through a future plan change or other process under new legislation.
Policy 10: Activities that contribute to New Zealand’s	Clause 3.5: Social, economic, and cultural wellbeing	There are numerous provisions in the ECO Chapter that relate to social, economic and cultural well-being, including ECO-	I consider that ECO Chapter is broadly aligned with these NPS-IB provisions, in particular ECO-O2 and ECO-P3. Given the potential for future changes to the NPS-IB and/or changes introduced

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<i>social, economic, cultural, and environmental wellbeing are recognised and provided for as set out in this National Policy Statement.</i>		O2 and ECO-P3 and the permitted vegetation clearance associated with different activities under ECO-R1.	through upcoming legislation, I consider that the ECO Chapter provisions as notified (subject to other recommendations in the s42A report) are sufficiently aligned with the NPS-IB at this stage. Recommendation: The NPS-IB provisions relating to providing for activities that contribute to New Zealand’s social, economic, cultural, and environmental wellbeing are given effect to through a future plan change or other process under new legislation.
Policy 11: <i>Geothermal SNAs are protected at a level that reflects their vulnerability, or in accordance with any pre-existing underlying geothermal system classification.</i>	Clause 3.13: Geothermal SNAs	N/A – there are no provisions relating to geothermal SNAs in the ECO Chapter.	The Kaipara District does not contain geothermal systems so these NPS-IB provisions do not need to be given effect to through the PDP. Recommendation: The NPS-IB provisions relating to geothermal SNAs are not applicable in the Kaipara District.
Policy 12: <i>Indigenous biodiversity is managed within plantation forestry while providing for plantation forestry activities.</i>	Clause 3.14: Plantation forests activities	ECO-P3 in the ECO Chapter provides direction to not unreasonably restrict existing primary production activities. Note 3 above the rules table states that “ <i>Indigenous vegetation clearance associated with plantation forestry is regulated under Regulations 93 and 94 of the National Environmental Standards for Commercial Forestry 2017 [NES-CF]. The rules in this chapter apply to vegetation clearance that is carried out before afforestation of commercial forestry but do not apply to indigenous vegetation clearance associated with commercial forestry.</i> ”	For the reasons outlined above, it is not appropriate or practicable for the PDP to give effect to NPS-IB requirements relating to managing the adverse effects of plantation forestry activities on SNAs. This is because these provisions in the NPS-IB are premised on SNAs first being identified in district plans, which requires a future plan change or other process under new legislation. In the absence of SNA mapping, the provisions of the NES-CF that manage indigenous vegetation clearance associated with plantation forestry apply. Recommendation: Policy 12 and Clause 3.14 in the NPS-IB relating to the adverse effects of plantation forestry activities on SNAs are given effect to through a future plan change or other process under new legislation.
Policy 13: <i>Restoration of indigenous biodiversity is promoted and provided for.</i>	Clause 3.21: Restoration	ECO-O3 and ECO-P4 in the ECO Chapter promote and encourage restoration of SNAs and indigenous biodiversity.	The ECO Chapter is broadly aligned with the provisions in the NPS-IB relating to the restoration of indigenous biodiversity. However, the ECO Chapter does not identify priorities for restoration, as outlined in Clause 3.21(2), which district plans are required to give effect to. Although ECO-P4 provides examples of restoration and enhancement activities, these are not ‘priorities’ and, in my view, there is an opportunity to better align the ECO chapter policies with Clause 3.21(2) by introducing a policy that specifically outlines restoration priorities. Recommendation: Policy 13 and Clause 3.21 in the NPS-IB are given effect to through a new ECO policy that aligns with the wording of an equivalent policy that I recommended for the Far North Proposed District Plan.
Policy 14: <i>Increased indigenous vegetation cover is promoted in both urban and non-urban environments.</i>	Clause 3.22: Increasing indigenous vegetation cover	N/A – the ECO Chapter includes does not include specific provisions relating to increasing indigenous vegetation cover in urban and non-urban environments.	Clause 3.22 requires further technical work by NRC to assess indigenous vegetation cover in urban and non-urban environments in the region. Once this exercise is complete, NRC needs to set targets for increasing indigenous vegetation cover in collaboration with territorial authorities and tangata whenua. District plans must then be amended to promote the increase of indigenous vegetation cover having regard to those targets. It is therefore not practicable or appropriate to give effect to Policy 14 and Clause 3.22 in the NPS-IB until the regional council has undertaken these technical assessments and engagement otherwise this would result in inconsistencies and potential rework. Recommendation: Policy 14 and Clause 3.22 in the NPS-IB are given effect to through a future district plan change or other process under new legislation.
Policy 15: <i>Areas outside SNAs that support specified highly mobile fauna are identified and managed to maintain their populations</i>	Clause 3.20: Specified highly mobile fauna	N/A – the ECO Chapter does not include any specific provisions relating to specified highly mobile fauna.	Clause 3.20 requires NRC to undertake further technical work to record areas outside SNAs that are “highly mobile fauna areas” working with landowners, tangata whenua, territorial authorities and DOC. Once these areas have been identified, district plans must include provisions to “ <i>maintain viable populations of specified highly mobile fauna across their natural range</i> ”. It is therefore not practicable or appropriate to give effect to Policy 15 and Clause 3.20 through the PDP

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<i>across their natural range, and information and awareness of highly mobile fauna is improved.</i>			<p>until the regional council has undertaken this technical work and engagement to record highly mobile fauna areas.</p> <p>Recommendation: Policy 14 and Clause 3.22 are given effect to through a future district plan change or other process under new legislation.</p>
Policy 16: <i>Regional biodiversity strategies are developed and implemented to maintain and restore indigenous biodiversity at a landscape scale.</i>	<p>Clause 3.23: Regional biodiversity strategies</p> <p>Appendix 5: Regional biodiversity strategies</p>	N/A – regional biodiversity strategies are outside the scope of the PDP.	Recommendation: No amendments are required as regional biodiversity strategies are to be developed by regional councils and are outside the scope of the PDP.
Policy 17: <i>There is improved information and regular monitoring of indigenous biodiversity.</i>	<p>Clause 3.24: Information requirements</p> <p>Clause 3.25: Monitoring by regional councils</p>	<p>N/A – there are no specific provisions in the PDP relating to information requirements for resource consent applications having more than minor effects on indigenous biodiversity.</p> <p>Clause 3.25 does not apply to district councils.</p>	<p>Clause 3.24 provides clear direction that local authorities must make changes to plans to require that resource consent applications resulting in more than minor adverse effects are not considered unless they contain a report addressing matters set out in Clause 3.24(2). The report must also be prepared by a suitably qualified ecologist and/or person with suitable expertise and be commensurate with the scale and significance of the proposal. The requirements in Clause 3.24 could potentially impose significant costs on applicants as many of the assessment matters are extensive and highly technical (e.g. identification of ecosystem services at the site, assessment of ecological integrity and connectivity). In my opinion, information requirements are better addressed as part of the suite of provisions required to give full effect to the NPS-IB through a future plan change or other process under new legislation. Further, the potential costs of these requirements cannot be properly assessed at this point of time.</p> <p>Recommendation: Policy 17 and Clause 3.24 in the NPS-IB are given effect to through a future plan change or other process under new legislation.</p>