

Appendix XX – S32AA Evaluation

Evaluation of Objectives

This section of the report evaluates the recommended objectives as to whether they are the most appropriate to achieve the purpose of the Act (RMA).

Recommended Objective(s)	Appropriateness to achieve the purpose of the Act
ECO-O1 ~~Maintain Indigenous biological diversity in the Gore District and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna (Significant Natural Areas). Indigenous biological diversity is maintained, and areas of significant indigenous vegetation and significant habitats of indigenous fauna (Significant Natural Areas/Significant Indigenous Vegetation Areas) are protected in the Gore District.~~ ECO-O2 <u>Significant Natural Areas/Significant Indigenous Vegetation Areas are identified and protected by working</u> ~~work~~ in partnership with Local Authorities, Government agencies, mana whenua, stakeholders and landowners ~~to identify and protect Significant Natural Areas.~~ ECO-O3 ~~Provide for appropriate subdivision, use and development within Significant Natural Areas where the values of the area can be maintained and enhanced. Significant Natural Areas/ Significant Indigenous~~	The objectives are considered the most appropriate way to achieve the purpose of the Act because they give effect to the relevant sections of the RMA/NPS-IB and SRPS as outlined below: RMA • Section 5(2) as maintaining indigenous biodiversity and protecting SNAs/SIVAs while providing for appropriate development and cultural values as well as working in partnership with the community will safeguard the life supporting capacity of ecosystems and provide for peoples social, economic and cultural wellbeing; • Section 6 (c) as the objectives seek the protection of Significant indigenous vegetation and significant habitats of indigenous fauna (SNAs/SIVAs); • Sections 6 (e), 7(a), and 8 as the objectives require working in partnership with mana whenua, protect SNAs, maintain indigenous biodiversity, and recognise the relationship of mana whenua and their customs and traditions including kaitiakitanga, mahinga kai, taonga species, and customary use; and • Section 31(b)(iii) as the objective recognise the broader role of maintaining indigenous biological diversity. NPSIB • Objective 1 that seeks to maintain indigenous biodiversity so there is at least no overall loss by recognising mana whenua as kaitiaki and the role of people and communities as stewards while providing for the social, economic wellbeing of communities. • Policies reflect these objectives and require recognition of the Treaty of Waitangi principles and mana whenua as Kaitiaki, a precautionary approach, the identification and protection of SNAs meeting detailed criteria (Appendix 4) and the maintenance

ECO-04 <u>Vegetation Areas are protected by avoiding or managing adverse effects from new subdivision, use and development</u> <u>Indigenous biodiversity is recognised as a taonga to mana whenua and the relationship of mana whenua and their customs and traditions with indigenous vegetation and ecosystems is recognised and provided for including by:</u> ~~The relationship of mana whenua and their customs and traditions with Significant Natural Areas is recognised and provided for including through:~~ <u>1. Enabling the exercise of kaitiakitanga;</u> <u>2. Enabling mahinga kai; and</u> <u>3. Maintaining or where degraded restoring the mauri of indigenous ecosystems.</u> ~~1.—Facilitation and support for the exercise of kaitiakitanga in relation to indigenous species and habitats;~~ ~~2.—Maintenance, enhancement, and restoration of habitats that support mahinga kai activities and sustain taonga species; and~~ ~~3.—Enabling customary use.~~ ~~4.—~~	of indigenous biodiversity outside SNAs while also providing for and managing certain activities. SRPS - Objectives seek to understand the extent of indigenous ecosystems and habitat loss, maintain the protection of indigenous biodiversity, and enhance the range, extent, and condition of indigenous biodiversity. - Policies require the identification of Significant indigenous vegetation and significant habitats of indigenous fauna (SIVAs) in accordance with criteria in SRPS Appendix 3 (BIO.1), maintain indigenous biodiversity (BIO.4), support biodiversity initiatives (BIO.5), active management of indigenous biodiversity including via the Regional Pest Management Plan (RPMP), and recognition of tangata whenua as kaitiaki (BIO.8), along with consideration of biodiversity offsets and compensation, while also recognising the critical role of landowners (BIO.10). Relevance and Usefulness: The objectives are relevant and useful as they address the identified resource management issues, are within scope of Councils functions, and give effect to higher order documents. The objectives provide a broader scope to include indigenous biodiversity rather than just SNAs/SIVAs, recognise mana whenua values, more clearly articulate regional and national direction (including the NPS-IB), and acknowledge the need to work with the community in identifying and protecting SNAs/SIVAs. The objectives will provide clearer guidance to decision makers as they articulate clear outcomes and are aligned with both the NPS-IB and also the SRPS by referencing SNAs and SIVA and identify which mana whenua values need to be recognised and provided for. Reasonableness: In the short term the costs of identifying SNAs/SIVAs and indigenous biodiversity have fallen on ratepayers and via funding provided by Central Government to Environment Southland. Once funding ends in mid-2025 these costs will fall to potentially affected landowners
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	through the consent process. It is anticipated that the risk of landowners having to meet this cost is relatively small given low consenting numbers in Gore and this period will be relatively short as the Council has signalled that mapping will be done as a plan change following engagement with landowners. As outlined in the economic evidence SNA/SIVA and IVA coverage is generally restricted to limited landowners over a small proportion of their land so costs are likely to be minimal. Mapping of SNAs may be costly in the medium term (although some preliminary mapping has already occurred and further funding may be available from other sources) but this will be offset by the greater level of certainty that will be provided to the community and directly affected landowners. Mapping is also deferred by the NPS-IB so will need to be undertaken using SRPS criteria in the meantime, particularly given the long timeframe to implementing the NPS-IB. Focusing on the values of the SNA rather than the SNA/SIVAs as a whole, aligning with the NPS-IB/SRPS, and working with the community to identify SNAs/SIVAs will also mean that rules can be more targeted and enabling to implement these objectives which should help address longer term costs. Having targeted objectives will also help reduce uncertainty and risk to SNAs/SIVAs and indigenous biodiversity and streamline the consenting process and associated costs. <i>Achievability:</i> The objectives are within the scope of Councils responsibilities and the clearer outcomes will help to improve achievability. Council will need to engage ecological expertise to help implement the objectives and provide clear guidance for consenting in the short term and mapping in the medium term. The objectives are consistent with mana whenua outcomes and regional direction which seek a wider focus of also maintaining indigenous biodiversity and cultural values, rights and responsibilities. <i>Costs and Benefits;</i> The amended provisions will increase economic and environmental benefits from the notified version as objectives are now better aligned with national and regional direction and provide more certainty. While there are still some short-term compliance costs it is anticipated that these will be minimal given the low coverage of SNAs/SIVAs and IVAs (indigenous vegetation
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	areas) across the district and low coverage on affected properties. Having a more targeted mana whenua objective will also provide greater certainty and reduce overall costs.
	<i>Risk of Acting or not acting</i>
	There is a risk of not acting that objectives will duplicate policy direction as the notified objectives do read more like policies than outcomes. Objectives will be less aligned with national and regional direction if they do not reference both SNA and SIVA. Also the mana whenua objective will be broader and less certain.

Summary
Overall, the proposed objectives provide greater clarity and certainty for plan users and decision makers whilst also achieving the purpose of the Act in a reasonable, useful, relevant and achievable manner. The Objectives will allow Council to fulfil their obligations under s31 of the Act, are consistent with identified mana whenua outcomes and align with relevant regional and national direction. The proposed objectives are the preferred option to address the key resource management issues identified in sections 2 and 4 of the notified s32 Assessment.

Evaluation of Policies

This section of the report evaluates the recommended policies as to whether they are the most appropriate to achieve the objectives of the PDP.

Recommended Policies	Efficiency and Effectiveness
ECO-P1 Work in partnership with Local Authorities, mana whenua, stakeholders and landowners to: <u>1. Identify areas of indigenous vegetation;</u> 2. identify <u>all areas of significant indigenous vegetation or significant habitats of indigenous fauna as</u> Significant Natural Areas (SNAs/<u>SIVAs</u>) to include: (a) Areas identified as SNA-1 (<u>Waterfall Range Dolamore Park/Croydon Bush</u>) and SNA-2 (Pukerau Red Tussock Reserve) on the planning maps, and	The policies are considered the most appropriate way to achieve the objectives for the following reasons: ECO-P1 implements objective ECO-O1 and ECO-O2 in that they require the identification of IVA, SIVA and SNAs in accordance with NPS-IB and SRPS requirements.

(b) ~~A variation to the Proposed District Plan to~~ identify areas that meet the criteria set out in Appendix 4 <u>or Appendix 3 of the Southland Regional Policy Statement</u>; and 3. <u>map and provide information about specified highly mobile fauna areas once they have been included in the Southland Regional Policy Statement map and describe each specified highly mobile fauna area.</u> ECO-P2 ~~Enable~~ <u>Allow</u> activities within <u>or affecting</u> SNAs/<u>SIVAs</u> that may impact ~~indigenous biodiversity values~~ <u>the extent or ecological integrity of the SNA/SIVA</u> where: 1. the activity is a lawfully established activity; or 2. Their purpose is to facilitate or express Ngāi Tahu rights, interests, or cultural purpose; or 3. The activity has a functional <u>or operational</u> need to be located in the area <u>and there are no alternative locations</u>; or 4. The activity has no more than minor adverse effects on the significant indigenous vegetation or fauna habitat, and/or Ngāi Tahu cultural purpose; or 5. <u>activities are consistent with a biodiversity covenant for the purpose of protecting or restoring the SNAs/SIVAs ecological values; or</u> 6. <u>The activity is no greater in intensity, scale or character: or</u> 7. <u>The activity involves the removal of exotic species and pest plants and pest animals in accordance with the Regional Pest Management Plan.</u> ECO-P3 Any new subdivision, use, or development shall avoid adverse effects on an SNA/<u>SIVA</u> that result in: 1. loss of ecosystem representation and extent; 2. disruption to sequences, mosaics, or <i>ecosystem</i> function; 3. fragmentation of SNAs or the loss of buffers or connections within an SNA; 4. reduction in the function of the SNA as a buffer or connection to other important habitats or <i>ecosystems</i>; and 5. a reduction in the population size or occupancy of <u>Threatened or At Risk (declining)</u> species that use an SNA for any part of their life cycle; Unless they relate to:	• ECO-P2, ECO-P3, ECO-P4, ECO-P5 and ECO-P7 implements ECO-O3 by enabling, managing and avoiding activities affecting SNA/SIVA in accordance with NPS-IB, NES-CF and SRPS requirements. • ECO-P6 implements ECO-O1 by promoting the restoration of indigenous biodiversity in accordance with the NPS-IB and SRPS requirements. • ECO-P8 and ECO-P9 have been deleted to avoid duplication with other policies as amended. • ECO-P10 implements ECO-O1 and more effectively implements NPS-IB and SRPS requirements by addressing the impacts of threatened and endangered species, providing for ecological enhancement, and recognising the benefits of weed and pest control. • ECO-P11 implements ECO-O1 and ECO-O4 by more clearly managing residual effects and recognising mana whenua values • ECO-P12 has been deleted to more effectively implement the SRPS by relying on the RPMP to manage the impacts of weeds and pests generally and ECO-P2(7) to enable the clearance of weeds and pests. • ECO-P13 implements ECO-O1, ECO-O2, and ECO-O3 by identifying SIVA and IVA in the Hokonui Hills area in conjunction with landowners and by seeking to enable an appropriate range of activities within these different areas. • ECO-O4 is more effectively implemented by amending ECO-P6, ECO-P7 and ECO-P11 to reference and target taonga species, mauri and mahinga kai. Relevance and Usefulness: The policies are relevant and useful as they address the identified resource management issues, are within scope of Councils functions, and give effect to higher order documents. The policies now provide a more targeted scope to include indigenous biodiversity rather than just SNAs/SIVAs, recognise specific mana whenua values, more clearly articulate regional and national direction (including the NPS-IB, NES-CF, SRPS, and RPMP), and acknowledge
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6. Construction <u>or upgrade</u> of specified infrastructure that provides significant national or regional public benefit; 7. Mineral and aggregate extraction that provides significant national public benefit that could not otherwise be achieved using resource in New Zealand; 8. The operation or expansion of any coal mine that was lawfully established before 4 August 2023, except that after 31 December 2030 this exception applies only to coal mines that extract Coking coal; and 9. There is a functional need or operational need to be in that particular location and there are no practicable alternative locations. ECO-P4 Manage any adverse effects on an SNA/<u>SIVA</u> from a new subdivision, use or development relating to the following matters in accordance with the effects management hierarchy: 1. Construction of specified infrastructure that provides significant national or regional public benefit; 2. Mineral and aggregate extraction that provides significant national public benefit that could not otherwise be achieved using resource in New Zealand; 3. The operation or expansion of any coal mine that was lawfully established before 4 August 2023, 4. a single residential dwelling on an allotment created before 4 August 2023 and there is no practicable location within the allotment for dwelling construction and on-site infrastructure to avoid adverse effects outlined in ECO-P3(1) to ECO-P3(5), 5. maintaining or restoring an SNA and this does not involve the permanent destruction of significant habitat of indigenous biodiversity, 6. An activity associated with the harvest of indigenous tree species from a SNA carried out in accordance with a forest management plan or permit under part 3A of the Forests Act 1949, such as track clearance and timber storage, but not the harvesting of trees itself. ECO-P5 ~~Plantation Commercial~~ Forest activities in any existing ~~plantation commercial~~ forest within a SNA/<u>SIVA</u> must be managed in a manner that:	the need to work with the community in identifying and protecting SNAs/SIVAs. The amended policies will provide clearer guidance to decision makers as they articulate clear methods and are aligned with both the NPS-IB and also the SRPS by referencing SNAs and SIVA and identify which mana whenua values need to be recognised and provided for. <i>Reasonableness:</i> The changes to policies referencing mapping requirements of SNAs and SIVA/IVA are considered reasonable as indicative mapping has been completed and will be considered further with landowners in the future. The Economic analysis indicates that compliance costs are minor given the comparatively low coverage of SNA/SIVA/IVA across the district and on private properties. Changes to policies are also more enabling as they provide for operational needs, covenanting, removal of weeds and pests, upgrading of specified infrastructure, commercial forestry, restoration work, and specific provision of mana whenua values and activities/clearance in the Hokonui Hills. The removal of policies that result in duplication amongst policies and with other tools such as the RPMP will also reduce implementation and compliance costs so will be more reasonable. <i>Achievability:</i> The policies are within the scope of Councils responsibilities and the clearer direction will help to improve achievability. Council will need to engage ecological expertise to help implement the policies and provide clear guidance for consenting in the short term and mapping in the medium term. The policies are consistent with mana whenua outcomes and regional direction which seek a wider focus of also maintaining indigenous biodiversity and cultural values, rights and responsibilities. The removal of policies that result in duplication amongst policies and with other tools such as the RPMP will also make development and continued operations more achievable. <i>Costs and Benefits:</i>
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1. Maintains indigenous biodiversity in the SNA/~~SIVA~~ as far as practicable while providing for ~~plantation commercial~~ forest activities to continue, and 2. Maintains the long-term populations (~~including population size, age structure and distribution~~) of any ~~Threatened or At Risk (declining)~~ species present in the area. ECO-P6 Promote the restoration of indigenous biodiversity by prioritising: 1. SNAs/~~SIVAs~~ whose ecological integrity is degraded: 2. threatened and rare ecosystems representative of naturally occurring and formerly present ecosystems ~~and taonga species~~: 3. areas that provide important connectivity or buffering functions: ~~4. natural inland wetlands whose ecological integrity is degraded or that no longer retain their indigenous vegetation or habitat for indigenous fauna:~~ 5. areas of indigenous biodiversity on specified Māori land where restoration is advanced by the Māori landowners: 6. any other priorities specified in regional biodiversity strategies, ~~iwi planning documents~~ or any national priorities for indigenous biodiversity restoration: ~~7. initiatives by mana whenua, landowners, land managers, community groups and others to protect, restore and maintain areas of significant indigenous biodiversity~~ ECO-P7 Protect, enhance and restore Significant Natural Areas/~~SIVA~~ by: 1. Minimising the loss, fragmentation and reduction of: (a) Significant Natural Areas/~~SIVA~~ (b) connections between Significant Natural Areas/~~SIVA~~, ~~and~~ (c) threatened or at risk and indigenous species populations, ~~and~~ ~~(d) the mauri of indigenous ecosystems;~~ ~~2. Enhancing mahinga kai;~~ ~~3. Promoting the creation of connections and ecological corridors between Significant Natural Areas;~~ ~~4. Promoting the use of eco-sourced species from the relevant ecological district;~~	The amended provisions will increase economic and environmental benefits from the notified version as policies are now better aligned with national and regional direction, are more streamlined and provide more certainty. While there are still some short-term compliance costs it is anticipated that these will be minimal given the low coverage of SNAs/SIVAs and IVAs (indigenous vegetation areas) across the district and low coverage on affected properties. Having more targeted mana whenua provisions and more enabling policies (see reasonableness above) will also provide greater certainty and reduce overall costs. <i>Risk of Acting or not acting</i> There is a risk of not acting that policies will duplicate work as the notified policies are repetitive. Policies will be less aligned with national and regional direction if they do not reference both SNA and SIVA and enable a broader range of activities. Also, the mana whenua provisions will be broader and less certain.
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5. Enabling opportunities for mana whenua to exercise their customary rights and responsibilities and mana whenua responsibilities as kaitiaki in restoring, protecting and enhancing areas of significant indigenous biodiversity including identified taonga...

6. Supporting initiatives and enabling by landowners, community groups and others to protect, restore and maintain areas of significant indigenous biodiversity.

6. enhancing community knowledge and education

~~ECO-P8~~ When assessing consents for subdivision, land use and development avoid effects which will:

- ~~1. Prevent an indigenous species or community being able to persist in their habitats in the ecological district;~~
- ~~2. Result in a degradation of the threat status, further measurable loss of indigenous cover or disruption to ecological processes, functions or connections in land environments in category one or two of the Threatened Environment Classification at the ecological district level;~~
- ~~3. Result in a reduction in the local population of threatened taxa in the Department of Conservation Threat Categories 1 – 3a – nationally critical, nationally endangered and nationally vulnerable; and~~
- ~~4. discourage mana whenua access to indigenous biodiversity for a mana whenua cultural purpose~~

~~ECO-P9~~ When assessing resource consents in Significant Natural Areas, consider the following matters:

- ~~1. The necessity for the activity to provide for critical infrastructure or renewable electricity generation;~~
- ~~2. Whether formal protection and active management of all or part of any Significant Natural Area will occur as part of the subdivision, land use or development;~~
- ~~3. The extent to which the proposed activity recognises and provides for Ngāi Tahu cultural purposes, rights and interests;~~
- ~~4. The cumulative effects of activities within or adjacent to any area of indigenous vegetation or habitat;~~
- ~~5. The effects the activity may have on the introduction or spread of exotic weed species and pest animals both terrestrial and aquatic;~~

~~6. The impacts on mahinga kai activities and species;~~
~~7. The impact of the activity on the values of any Significant Natural Area, rare or threatened indigenous species or taonga species and how any potential impact could be avoided, remedied or mitigated; and~~
~~8. The appropriateness and effectiveness of any biodiversity offsetting or compensation in accordance with ECO – P7 to offset any residual adverse effects that remain after avoiding, remedying and mitigating measures have been applied.~~

ECO-P10 Maintain indigenous biodiversity across the district by:

1. Avoiding adverse effects of new subdivision, use or development that result in a reduction in the local population of threatened taxa in the Department of Conservation Threat Categories 1 – 3a - nationally critical, nationally endangered and nationally vulnerable.

1A. Managing any significant adverse effects of new subdivision, use or development by applying the effects management hierarchy;
 2. Managing the adverse effects of new subdivision, use or development on highly mobile fauna areas in order to maintain ~~viable~~ populations of specified highly mobile fauna across their natural range
 3. Maintaining, and where appropriate enhancing or restoring, the functioning of ecological corridors and linkages;
 4. Minimising adverse effects on, and encouraging mana whenua access to, areas of indigenous biodiversity which are significant to mana whenua;
 5. Establishing a Biodiversity Stakeholder Group to review District Plan provisions, encourage ongoing non-regulatory assistance, and ~~enhance support~~ landowners s in their engagement with Council;
 6. ~~Developing~~ Contribute to a regional biodiversity strategy that would consider free ecological surveys, financial support to Significant Natural Area landowners, rates remissions for Significant Natural Areas, and advice and support for local conservation groups and programmes;

7. Preserving protected wildlife; and 8. Recognising the benefits of farm management practices and active management of indigenous biodiversity, including ~~the voluntary~~ control of ~~invasive plant and animal species~~ ~~animal and plant pest~~ and ~~voluntary~~ stock control and/or formal legal protection. <u>9. Providing for ecological enhancement works that will restore or enhance areas of indigenous biodiversity.</u> ECO-P11 Provide for ~~indigenous~~ biodiversity offsets and compensation ~~to manage residual adverse effects of an activity~~ where: <u>1. More than minor residual effects of an activity cannot be avoided, minimised, or remedied; and</u> <u>2. The goal of the biodiversity offsets is no net loss and, preferably, a net gain of biodiversity of similar species and location ~~can be achieved~~ where practicable;</u> <u>3. The conservation outcomes are measurable and positive; and</u> <u>4. The biodiversity offsets or compensation are in accordance with best practice, including but not limited to New Zealand Government guidance on biodiversity offsetting; and</u> <u>5. Any off-setting and compensation packages are ~~consistent with Ngāi Tahu cultural purposes appropriate considering the whakapapa, mauri and any mahinga kai values of both sites and areas.~~</u> <del>ECO-P12 Avoid the planting of exotic weed ~~invasive species and the intentional release or farming of animal pests within SNA's~~</del> ~~ECO-P13 Enable a range of activities and associated <i>indigenous vegetation clearance</i> that recognises the scale of farming operations, the different levels of significance of indigenous vegetation, and landowner conservation practises in the <i>Hokonui Hills Area</i>.~~	
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Summary

Overall, the recommended policies provide greater clarity and certainty for plan users and decision makers along with avoiding duplication whilst also achieving the PDP objectives in a reasonable, useful, relevant and achievable manner. The policies will allow Council to fulfil their obligations under s31 of the Act, are consistent with identified mana whenua outcomes and align with relevant regional and national direction. The recommended policies are the preferred option to address the key resource management issues identified in sections 2 and 4 of the notified s32 Assessment.

Evaluation of Rules and Maps

This section of the report evaluates the recommended rules and maps as to whether they are the most appropriate to achieve the objectives of the PDP.

Recommended Rules and Maps	Efficiency and Effectiveness
ECO -R1 has been amended to: • Enable indigenous vegetation clearance and land disturbance for the <u>upgrade</u> as well as maintenance, repair or replacement of a number of structures/infrastructure. • Increase clearance limits associated with the above matters by clarifying that limits are either side of the structure/infrastructure or no greater than existing width of some structures/infrastructure. • Enable clearance associated with a Council Approved Biodiversity Management Plan in order to avoid future consent processes/costs • Clearance in IVAs associated with plantation forestry	The rules/maps are considered the most appropriate way to achieve the objectives for the following reasons: • ECO-R1 implements objective ECO-O1, ECO-O2, ECO-O3 in that they rely on the specific and indicative identification/definition of IVA, SIVA and SNAs in accordance with NPS-IB and SRPS requirements and the protection of SNA/SIVA as a non-complying activity where permitted standards are not met along with the maintenance of indigenous biodiversity as a discretionary activity where permitted standards are not met. ECO-R1 has also been amended to permit a range of activities that the NPS-IB anticipates will be permitted and requires consent for those activities that need to be tested using the effects management hierarchy outlined in the NPS-IB. ECO-R1 has also been tested and amended by Councils consultant ecologist and economist to be shown to enable the communities economic and environmental well-being, safeguarding the life supporting capacity of ecosystems and appropriately addressing adverse effects of activities on the environment. ECO-R1 also provides for clearance in accordance with a Council Approved Biodiversity Management Plan to avoid the need for resource consents in the future. • ECO-R1 also implements ECO-O4 relating to mana whenua values by providing for mahinga kai activities and Ngāi Tahu cultural purposes as well as providing for general protection of IVA and SIVA.

• Enable clearance less than 50m² in any 5 year period or of vegetation less than 15 years old • Make clearance in SIVA as well as SNAs and affecting threatened or at risk species non-complying A new Rule has been included (ECO-R2) in the Hokonui Hills area to permit matters outlined in ECO-R1 as well as clearance shown in mapped improved pasture areas and associated with the maintenance of existing fences and tracks (with no clearance limits). The new ECO-R2 also permits clearance within limits on SIVA and IVA land in the Hokonui Hills Area. Where these limits are not met consent is required as a restricted discretionary activity within IVA and non-complying in SIVA. Notified Rules ECO-R2 and ECO-R3 relating to weed and pest management are deleted due to duplication with the RPMP noting that the removal of weed and pest plants are permitted in ECO-R1 and new ECO-R2. SUB-R4 is amended to clarify that subdivision affecting SIVA and threatened or at-risk species needs discretionary activity consent. Detailed maps have also been included (PDP Appendix 7) that show SIVA, IVA, and improved pasture areas in the Hokonui Hills as well as indicative maps showing SIVA and IVA across the district to guide implementation of ECO-R1 and for landowner engagement purposes until mapping plan changes are undertaken to implement changes to the NPS-IB.	• New ECO-R2 implements the above objectives by specifically identifying SIVA, IVA and improved pasture within the Hokonui Hills area along with a rule framework that, based on ecological assessments achieves a no net loss outcome for indigenous biodiversity. The restricted discretionary setting for works not meeting permitted standards, while different from ECO-R1 which is discretionary, also achieves the outcomes of ECO-O1 because the detailed assessment undertaken have been able to establish appropriate matters of discretion to address anticipated environmental effects. • Deleting notified ECO-R2 and ECO-R3 relating to weed and pest management helps to efficiently address ECO objectives as this avoids potential duplication with the RPMP, noting that if consent is required for indigenous vegetation clearance consent will be assessed against ECO-P10 (8) which includes the control of invasive plant and animal species. It is also noted that ECO-R1(1)(h) and ECO-R2(1)(h) implement ECO-P2(7) by permitting activities involving the removal of exotic species and pest plants and animals in accordance with the RPMP. • Amendments to SUB-R4 implement ECO-O1, ECO-O2, and ECO-O3 by affording protection to SIVA and threatened or at-risk species. Relevance and Usefulness: The amendments to the rules/maps are relevant and useful as they address the identified resource management issues, are within scope of Councils functions, and give effect to higher order documents. The rules/maps now provide a more targeted scope to include indigenous biodiversity rather than just SNAs/SIVAs, recognise specific mana whenua values, and more clearly articulate regional and national direction (including the NPS-IB, NES-CF, SRPS, and RPMP). The amended rules will provide clearer guidance to decision makers as they articulate clear methods and are aligned with both the NPS-IB and also the SRPS by relying on indicative and specific SNA/SIVA and IVA mapping and identify which mana whenua values need to be recognised and provided for. Reasonableness: The changes to rules that generally rely on existing mapping are considered reasonable as indicative mapping has been completed and will be considered further with landowners in the
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	future. The Economic analysis indicates that compliance costs are minor given the comparatively low coverage of SNA/SIVA/IVA across the district and on private properties. Changes to rules are also more enabling as they provide for operational needs, covenanting, removal of weeds and pests, upgrading of specified infrastructure, commercial forestry, restoration work, and specific provision of mana whenua values and activities/clearance in the Hokonui Hills. The removal of rules that result in duplication and rely instead on other tools such as the RPMP will also reduce implementation and compliance costs so will be more reasonable. <i>Achievability:</i> The rule changes are within the scope of Council's responsibilities and the clearer direction will help to improve achievability. Council will need to engage ecological expertise to help implement the rules and provide clear guidance for consenting in the short term and mapping in the medium term. The rules are consistent with mana whenua outcomes and regional direction which seek a wider focus of also maintaining indigenous biodiversity and cultural values, rights and responsibilities. The removal of rules that result in duplication and rely instead on other tools such as the RPMP will also make development and continued operations more achievable. <i>Costs and Benefits:</i> The amended provisions will increase economic and environmental benefits from the notified version as rules are now better aligned with national and regional direction, are more streamlined and provide more certainty. While there are still some short-term compliance costs it is anticipated that these will be minimal given the low coverage of SNAs/SIVAs and IVAs (indigenous vegetation areas) across the district and low coverage on affected properties. Having more targeted mana whenua provisions and more enabling rules (see reasonableness above) will also provide greater certainty and reduce overall costs. <i>Risk of Acting or not acting</i> There is a risk of not acting that rules will duplicate work as the notified rules cover matters addressed in the RPMP. Rules will be less aligned with national and regional direction if they
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	do not reference both SNA and SIVA and enable a broader range of activities. Also, the mana whenua provisions will be broader and less certain.
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Summary
Overall, the amended rules and maps provide greater clarity and certainty for plan users and decision makers whilst also achieving the purpose of the Act and the ECO objectives in a reasonable, useful, relevant and achievable manner. The rules and maps will allow Council to fulfil their obligations under s31 of the Act, are consistent with identified mana whenua outcomes and align with relevant regional and national direction. The amended rules are the preferred option to address the key resource management issues identified in sections 2 and 4 of the notified s32 Assessment.