

SUBMISSION POINTS BY PLAN CHAPTER – Appendix 1A

Submitter	Submission Point	Provision	Stance	Reasons	Decision Requested
S32 Director- General of Conservation	S32.037	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Support in part	The inclusion of this table is an appropriate reflection of the status of the listed ecosystems and species, and is useful for implementation of the relevant policies. However, there are ongoing changes to our knowledge of the status of ecosystems and species (eg threat classifications for plants are currently under review), so the RPS will need to be able to reflect the most up-to-date information.	Retain Table 17, but prior to finalising decisions on the RPS change either update the table to ensure it is as up-to-date as possible, or add generic reference to threat classifications.
S94 Guardians of the Bays Incorporated	S94.021	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Support	Not stated	Retain as notified
S100 Meridian Energy Limited	S100.027	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Oppose in part	The justification for inclusion of some of the items in proposed Appendix 1A is unclear.	Delete Appendix 1A
S123 Peter Thompson	S123.022	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Support	Limits are needed if the decline in biodiversity is to be halted	Retain as notified.
S144 Sustainable Wairarapa Inc	S144.035	Appendix 1A: Limits to biodiversity offsetting and	Support	Limits are needed if the decline in biodiversity is to be halted	Retain as notified.

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		biodiversity compensation			
S148 Wellington International Airport Ltd (WIAL)	S148.043	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Oppose	<p>WIAL is concerned that the list of species in Table 17 is too broad. This coupled with the limits to offsetting and compensation that are set out in Appendix 1A and associated policies will mean that many projects which include beneficial ecological outcomes involving offsetting and/or compensation will not be able to be considered. For example, Table 17 sets out that "lake margins" meets or exceed Policy 24(b).</p> <p>The explanation set out in the Appendix 1A sets out that ecosystems and species that meet the criteria for Policy 24(b) exceed the limits of biodiversity compensation meaning that applications for compensation cannot be considered. This appears to be very broad for any activity which may affect a broadly defined "lake margin".</p> <p>Giant kelp which is present around the airport coastal area also triggers both Policy 24(a)(i) and NZCPS Policy 11(a) which when read against Appendix 1A appears that any activities which may impact on species would not be able to offer any offsetting or compensation and therefore proposals could not be considered.</p>	Delete both Appendix 1A and Table 17 in their entirety.
S162 Winstone Aggregates	S162.018	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Oppose	<p>The introduction states that 'the setting of limits to the use of offsetting is one of the ten internationally accepted principles of biodiversity offsetting...'. The changes proposed via PPC1 incorrectly interpret this principle are at odds with RMA, case law and direction of the Draft NPSIB (which may or may not become operative), Limiting the total offset to 10% of effects is a crude way to apply limits and in practice will limit and/or prevent opportunities for significant biodiversity gains from our quarrying projects.</p> <p>Limiting offset based entirely on presence of species is inappropriate. The costs and benefits of this approach coupled with Policy 24 have not been properly considered or evaluation in the s32 report. It is unclear what the evidential basis is for the species list inclusion or the information that fed into the cost and benefit evaluation.</p> <p>The proposed changes effectively mean that will be unable to use offsetting or compensation in the most common</p>	Delete Appendix 1A. <i>[Note: Submission reference to prior submission point 009, the rejection of changes to Policy 24]</i>

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				situations where they are most likely to be required, sterilising the aggregate resource and leaving no pathway for quarrying in these circumstances despite the need to occur where the resource is based.	
S168 Rangitāne O Wairarapa Inc	S168.082	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Support	Rangitāne o Wairarapa support this appendix, noting the above comments on Policy 24. The inclusion of ecosystem and species names for clarity is supported, acknowledging that this does not preclude additional species or ecosystems being considered.	Retain as notified
S115 Hutt City Council	S115.0117	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Oppose	<p>While indigenous biodiversity is a key issue, we expect the government to soon gazette a National Policy Statement on Indigenous Biodiversity ("NPS-IB"). The proposed provisions may well conflict with the NPS-IB especially with regards to the process for identifying indigenous ecosystems.</p> <p>We request that all provisions relating to indigenous biodiversity be deleted and if regional direction is thought necessary after the NPS-IB is gazetted, that should occur through a variation or a separate policy statement change.</p>	Delete Appendix 1A.
S131 Ātiawa ki Whakaron gotai Charitable Trust	S131.0158	Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation	Support in part	<p>Ātiawa acknowledge the need for biodiversity offsetting and biodiversity compensation, Ātiawa are concerned that offsetting and compensation may be preferred over protecting existing biodiversity. Ātiawa maintain an interest in ensuring that mana whenua values, including our relationship with our culture, ancestral lands, water, sites, wāhi tapu and taonga (including taonga species) are protected from biodiversity offsetting and biodiversity compensation. It is important to note that not all mana whenua values can be replaced or replicated, therefore it is not appropriate to apply biodiversity offsetting or compensation where an area contains our values.</p>	<p>Amend to include new subclause: Policy 24(a) directs that where policies and/or rules in district and regional plans enable the use of biodiversity offsetting they shall not provide for biodiversity offsetting: where there is no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset (clause (i)); or when an activity is anticipated to causes residual adverse effects on an area after an offset has been implemented if the ecosystem or species is threatened or the ecosystem is naturally uncommon (clause (ii)) or the indigenous ecosystem or habitat contains mana whenua values (including spiritual, historical or cultural significance to mana whenua). (Policy 24(b) directs that where policies and/or</p>

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					<p>rules in district and regional plans enable the use of biodiversity compensation they shall not provide for biodiversity compensation where an activity is anticipated to cause residual adverse effects on an area if the ecosystem or species is threatened or the ecosystem is naturally uncommon or, the ecosystem or habitat contains mana whenua values (including spiritual, historical or cultural significance to mana whenua).</p>
<p>S165 Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)</p>	<p>S165.0148</p>	<p>Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation</p>	<p>Support in part</p>	<p>Threat classification for species and ecosystems change over time.</p>	<p>The appendix is supported but amendment is sought to be clear that Appendix 1A is not fixed in time and recognises that the threat status of species and ecosystems may change over time. If this occurs the most up to date information should be used.</p>
<p>S167 Taranaki Whānui</p>	<p>S167.0192</p>	<p>Appendix 1A: Limits to biodiversity offsetting and biodiversity compensation</p>	<p>Support in part</p>	<p>Taranaki Whānui are keen to understand the method used for compiling and rating/grading the list in Appendix 1A.</p> <p>What input has come from mana whenua?</p> <p>Taranaki Whānui feel strongly that this list needs to be developed in partnership with mana whenua and to include mātauranga Māori. Due to the significance of the list and what it protects, mana whenua should also partner in the management/regulating and monitoring of the implementation of Policy 24.</p>	<p>Amend this provision to address the relief sought. [Note.: This submission point refers back to S167.088 in relation to Policy 24]</p>