

Notice is hereby given of the

Strategy and Policy Committee - Rautaki me Mahere

Wednesday 2 April 2025 at 10:00 am

Environment Southland Council chamber, 220 North Road, Invercargill
25/S&P/13

Committee Members

Cr Lyndal Ludlow (*Chair*)
Cr Neville Cook
Cr Paul Evans
Cr Alastair Gibson
Cr Robert Guyton
Cr Peter McDonald
Cr Jeremy McPhail

Cr Jon Pemberton
Cr Phil Morrison
Cr Maurice Rodway (*Deputy*)
Cr Eric Roy
Chairman Nicol Horrell (*ex officio*)
Mr Stewart Bull (*Mana Whenua Representative*)
Ms Ann Wakefield (*Mana Whenua Representative*)

Agenda

This meeting will be livestreamed through YouTube and will be available to view on our website.
<https://www.es.govt.nz/about-us/live-stream>

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Rachael Millar

General Manager Strategy, Policy and Science

RECOMMENDATIONS IN COUNCIL REPORTS ARE NOT TO BE CONSTRUED AS COUNCIL POLICY UNTIL ADOPTED BY COUNCIL

Terms of Reference - Strategy and Policy Committee

Council assigns to the Committee responsibilities from time-to-time, and the Committee provides advice and reports back to Council on:

1. the provision of governance oversight into the development and review of plans, policies, strategies and by-laws;
2. the recommendation to notify proposed changes or variations to proposed plans, policies, strategies and by-laws;
3. the governance oversight of consultation related to regional policies, plans and strategies;
4. the appointment of hearing committees or panels to hear submissions on regional policies, plans and strategies;
5. undertaking Water and Land Plan associated project work;
6. the receipt, and if necessary endorsement of, scientific studies/reports; receipt of SOE reports and/or score cards;
7. the compiling of submissions to Government as needed (if the Council timetable does not provide for same).

1 Welcome I Haere mai

2 Apologies I Ngā pa pouri

Apologies had been received on behalf of Cr Paul Evans.

3 Declarations of interest

At the time of the agenda closing. No declarations of interest had been received for this meeting.

4 Public forum, petitions and deputations I He huinga tuku korero

The purpose of this item is to provide an opportunity for members of the public to convey concerns, make suggestions to, and have input with, the Council. The Council or Committee will provide up to 20 minutes at the commencement of each meeting for members of the public to address the meeting but will allocate only five minutes for each speaker or group.

Mr Scott Hobson will be in attendance to speak on the topic of 'Reductions in nitrate output from pastoral farming – a better path forward'. He will be attending via zoom.

Ms Pip Standish will be in attendance to give the Councillors an update on the upcoming 2025 Ballance Farm Environmental Awards night on 11 April 2025.

5 Confirmation of minutes I Whakau korero

Attached are the minutes from the Strategy and Policy Committee meeting held 24 February 2025.



Minutes of the Strategy and Policy Committee - Rautaki me Mahere

Held at Environment Southland, 220 North Road, Invercargill
Monday, 24 February 2025 at 10:00 am

Present:

Cr Lyndal Ludlow (Chair)
Cr Neville Cook
Cr Paul Evans
Cr Alastair Gibson
Cr Robert Guyton
Cr Peter McDonald
Cr Jeremy McPhail
Cr Jon Pemberton
Cr Maurice Rodway (Deputy)
Cr Eric Roy
Chairman Nicol Horrell (ex officio)

Mrs Rachael Millar (General Manager Strategy, Policy and Science)
Mrs Mikayla Wass (Committee Advisor)

1 Welcome I Haere mai

The chairperson welcomed everyone to the Strategy and Policy Committee meeting for Monday 24 February 2025, and opened the meeting with a karakia.

2 Apologies I Ngā pa pouri

Resolved:

Moved Cr Roy, seconded Cr Rodway that apologies be accepted on behalf of Cr Phil Morrison, Mr Stewart Bull and Ms Ann Wakefield.

Carried

3 Declarations of interest

There were no declarations of interest made by councillors.

4 Public forum, petitions and deputations I He huinga tuku korero

There were no public forum, petitions or deputations presented at the meeting.

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5 Confirmation of minutes I Whakau korero

Resolved:

Moved Chairman Horrell, seconded Cr McPhail that the minutes of the Strategy and Policy Committee meeting held on 12 December 2024 be confirmed as a true and accurate record.

Carried

6 Notification of extraordinary items/urgent business I He panui autaia hei totoia pakihi

There were no extraordinary items or urgent business tabled for inclusion in the agenda.

7 Questions I Patai

There were no questions asked by the councillors.

8 Chairman and councillors reports I Ngā purongo-a-tumuaki me ngā kaunihera

Cr Rodway spoke to his report on the World Wetlands Day Field Trip on 23 February 2025. He gave an overview of the day and noted the low attendance. It was queried whether the potential for more shallow, natural wetlands had been considered. A discussion took place.

Chairman Horrell noted the Rakiura Predator free presentation he had attended.

Resolved:

Moved Cr Rodway, seconded Cr Roy that Strategy and Policy Committee accept the Chairman and Councillor reports.

Carried

9 Reports

9.1 Retrospective Approval of Past Submissions

This item sought retrospective formal approval of Environment Southland's recent submissions which were on the Offshore Renewable Energy Bill, Draft Sandy Point Domain Reserve Management Plan and Draft Implementation Plan, Resource Management (consenting and other system changes) Amendment Bill, Draft Donovan Park Management Plan and Draft Implementation Plan, and Local Government (Water Services) Bill. Councillor input was obtained via workshops and online communications.

It was noted that the select committee had provided an opportunity for staff to speak to their submission on the Resource Management (Consenting and Other System Changes) Amendment Bill.

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**Resolved:****Moved Cr Cook, seconded Cr Gibson that Council:**

- 1 receive the report - Retrospective Approval of Past Submissions.**
- 2 formally approve Environment Southland's submission on the Offshore Renewable Energy Bill**
- 3 formally approve Environment Southland's submission on the Draft Sandy Point Domain Reserve Management Plan and Implementation Plan**
- 4 formally approve Environment Southland's submission on the Resource Management (Consenting and Other System Changes) Amendment Bill**
- 5 formally approve Environment Southland's submission on the Donovan Park Management Plan**

Carried**9.2 Government Policy and Legislation Monitor**

This item provided a comprehensive overview of the current and upcoming national policy changes, with a focus on those expected to significantly impact on Environment Southland's operations and the Southland region. Staff had submitted on the Resource Management Amendment Bill #2 and it was noted that the timeline for consideration had extended. An update would be expected in April 2025 and staff would be seeking more input from Councillors. It was also advised that more changes in the Climate Change space were expected.

Resolved:**Moved Cr Evans, seconded Cr Gibson that Council receives the report - Government Policy and Legislation Monitor.****Carried****9.3 Freshwater science report package**

The purpose of this item was to provide an overview of the suite of science documents that had been prepared for freshwater policy development and catchment management. It was noted that the catchment summaries would be uploaded to the website the following day. The catchment summaries would provide information on effective actions that individuals could take to maximize their impacts.

It was noted that Councillors needed to clarify their understanding of the term 'reference period'.

Resolved:**Moved Chairman Horrell, seconded Cr Ludlow that Council receives the report - Freshwater science report package.****Carried**

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9.4 Update on appeals to the Proposed Southland Water and Land Plan

The purpose of this item was to provide an update on the progress with the outstanding appeals to the proposed Southland Water and Land Plan, as there were three outstanding appeals. It was noted that staff had met with the working group to discuss a package of solutions related to weed and sediment removal. They were actively collaborating with all parties involved to reach a resolution.

Resolved:

Moved Cr Pemberton, seconded Cr Cook that Council receive the report – Update on appeals to the Proposed Southland Water and Land Plan.

Carried

9.5 Climate change and community resilience portfolio update

This item was to give an update of progress being made on the development of the regional framework for action, as well as to seek feedback from the Committee on the 'Proposed components of a Regional Framework for Action' document, which was included in the agenda.

It was discussed that consideration should be given to how the Framework for Action aligned with the Strategic Framework. Incorporating this alignment into the reporting on agenda items would be beneficial and should be discussed further at the next climate change subcommittee meeting.

Cr Ludlow referenced her action from the previous meeting regarding the investigation of an information-sharing portal for Councillors. It was discussed that a climate change information portal would be helpful for Councillors to share relevant resources in a "Dropbox"-style format. Additionally, it was suggested that this portal could be expanded to include contributions from other Councils, following a filtering process for the information.

It was noted that any further feedback on the 'Proposed components of a Regional Framework for Action' should be sent to Anke Habgood following the meeting.

Resolved:

Moved Cr Evans, seconded Chairman Horrell that Council:

- 1 receive the report - Climate change and community resilience portfolio update.**
- 2 provide feedback on the content of Appendix 1 attached.**

Carried

9.6 Group Update

The item provided an update on the work being carried out by the Strategy, Policy and Science Group.

Resolved:

Moved Cr Roy, seconded Cr Gibson that Council receives the report - Group Update.

Carried

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9.7 Update on Councillor Requests and Actions

This item captured Councillor requests and actions that have occurred during Strategy and Policy Committee meetings a provided an update on how they are being responded to.

During the previous committee meeting, it was noted that an additional paper regarding land use change to forestry would be presented at a future committee meeting. It was suggested that this topic could be discussed in a workshop format prior to the presentation of the paper.

Resolved:

Moved Cr Cook, seconded Cr Evans that Council receives the report and approve the letter to the Minister of Resources regarding timeframes - Update on Councillor Requests and Actions.

Carried

10 Extraordinary/urgent business I Panui autia hei totoia pakihi

There were no extraordinary items or urgent business tabled for inclusion in the agenda.

11 Public excluded business I He hui pakihi e hara mo te iwi

There was no public excluded business.

12 Termination

There being no further business, the meeting closed at 12.12 pm.

6 Notification of extraordinary items/urgent business I He panui autaiā hei totoia pakihi

At the time of the agenda closing, there were no notifications of extraordinary or urgent items.

7 Questions I Patai

At the time of the agenda closing, there were no questions asked for this meeting.

8 Chairman and councillors reports I Ngā purongo-a- tumuaki me ngā kaunihera

At the time of the agenda closing, no Councillor Reports were received for the meeting.

9 Reports

9.1 Darwins Barberry Biocontrol Submission

Report by: Polly Bulling, Team Leader Biodiversity

Approved by: Lucy Hicks, General Manager Integrated Catchment Management
 Rachael Millar, General Manager Strategy, Policy & Science

Report Date: 2 April 2025

Purpose

To gain Strategy and Policy support for Canterbury Regional Council's application to import or release Darwin's barberry rust fungus (*Puccinia berberidis-darwinii*) and Darwin's barberry flower weevil (*Anthonomus kuscheli*) as biological control agents for Darwin's barberry (*Berberis darwinii*).

Summary

Canterbury Regional Council has applied to the Environment Protection Agency (EPA) for approval to import and release a foliar rust fungus, *Puccinia berberidis-darwinii* and the flower weevil, *Puccinia berberidis-darwinii* as biological control agents for the invasive weed Darwin's Barberry (*Berberis darwinii*).

Darwin's Barberry is a Progressive Containment species in Murihiku Southland. The plant is an ecological and agricultural pest, invading native and farmland. Control efforts are focused on adjacent buffer control zones preventing its establishment in Fiordland and Rakiura National Park through the Regional Pest Management Plan (RPMP). Recent Jobs for Nature funding significantly increased control work however, ongoing investment is needed to maintain the gains made. Biocontrol is another tool that can be used to progressively contain this pest plant.

Biosecurity staff have drafted a submission for approval that supports the release of Darwin's Barberry biocontrol agents *Puccinia berberidis-darwinii* and *Anthonomus kuscheli* to be introduced to New Zealand and eventually Southland.

Recommendation

It is recommended that the Strategy and Policy Committee resolve to:

- 1 Receive the report - Darwins Barberry Biocontrol Submission.
- 2 Approve the submission to the Environment Protection Agency (EPS) in support of Canterbury Regional Council's application.

Background

Darwin's Barberry (*Berberis darwinii*) is distributed across most regions in Aotearoa. It is classified as a pest species by most regional councils and is a progressive containment species here in Southland. Darwin's Barberry is a significant threat to indigenous ecosystems and biodiversity and farmland as it is a long-lived plant that tolerates moderate to cold temperatures, damp to dry conditions, high wind, salt, shade, damage, grazing (not browsed), and a range of soils. Birds and possibly possums eat the berries and subsequently spread the seeds. Berries are also occasionally spread by soil and water movement.

It is capable of invading pasture, disturbed forest, shrubland, tussock land, along roadsides and other sparsely vegetated sites. The plant forms dense colonies that replace existing vegetation and prevent the establishment of desirable plants. Darwin's barberry will also establish under canopy in forest and shrubland. It can grow more rapidly than native species when suitable conditions arise, allowing it to dominate sites where it establishes.

Darwin's Barberry is widely distributed across Southland with control efforts focused on adjacent buffer control zones preventing its establishment in Fiordland and Rakiura National Park through the Regional Pest Management Plan (RPMP). Recent Jobs for Nature funding significantly increased control work however, ongoing investment is needed to maintain the gains made. Controlling Darwin's Barberry is time consuming and expensive with limited tools available aside from physically controlling it in forest ecosystems. One biocontrol agent has been released for Darwin's Barberry, *Berberidicola exaratus* a seed weevil which predate the seeds as larvae and reduce seed production. The Darwin's Barberry seed weevil has had limited success in New Zealand however has established in Southland but it's slow breeding cycle and dispersal means we are only able to manually shift them to one or two new sites each year. The addition of the two proposed agents will support the control investment already made in the National Park buffer zones and lower the financial burden of control on farmland in Southland.

The Darwin's Barberry Rust (*Puccinia berberidis-darwinii*) is a host specific pathogen which can produce a range of symptoms in its host. Low damage to high levels of infection resulting in chlorotic, premature defoliation and leaf death and damage to fruit. In its native range infected Darwin's Barberry plants overall appeared unhealthy and with less foliage than uninfected plants. This damage will prevent growth of the plants leading to their decline and infected fruits will likely prevent or reduce recruitment through seed dispersal. There are no native *Berberis* species in New Zealand so host range testing was carried out on native *Clematis forsteri* and *Ranunculus acaulis* which are in the Ranunculaceae family with Darwin's barberry. Host testing was carried out on a further 11 exotic species that are closely related and present in New Zealand but in many cases naturalised and classed as a weed. The results shows that the rust is unable to infect and produce spores on any of the plants used in the host testing and does not pose a threat to New Zealand's native plants. Furthermore, literature reviews and field surveys in the native range have only found *Puccinia berberidis-darwinii* on Darwin's Barberry. *No significant environmental or economic risks were identified during host range testing.*

Anthonomus kuscheli is a flower weevil, adults feed on and damage flowers and flower buds causing damage to the flowers and reducing seeding potential. Adults can also feed on new growth in leaf axils and shoots. The main damage comes from the larvae which each consume an entire flower bud, preventing seed production.

This agent was first imported into New Zealand by Manaaki Whenua Landcare Research into containment for host range testing in 2012, with permission to release granted by the EPA in late 2012. Environment Southland supported the application and release at the time. Despite being approved for release no releases were made as efforts were focused on the Darwin's Barberry Seed Weevil establishment with the permission expiring. We are now looking to re-new this permission due to the slow establishment of the seed beetles.

There are no native plants in the Berberidoiceae family and host range testing strongly indicated that *A. kuscheli* will not eat and is unable to reproduce on native plants. Host range testing showed that adults are able to feed on but unable to complete development on other exotic *Berberis* species found in New Zealand with the exception of *Berberis thunbergii atropurpureum* which is exotic to NZ. *No significant environmental or economic risks were identified during host range testing.*

Increasing the number of tools available to councils and community groups who are tackling the Darwin's Barberry problem across New Zealand will increase the chance of successful control and reduce the risk of Darwin's Barberry spreading and re-establishing in the areas where investment has been spent on control in the Southland region. It will also reduce the long-term costs of control work that is needed.

Current situation

Biosecurity staff have assessed Canterbury Regional Council's application to the Environment Protection Agency (EPA) to release the Darwin's Barberry biocontrol agents *Puccinia berberidis-darwinii* and *Anthonomus kuscheli*. Staff have concluded that although Darwin's Barberry is being controlled in some areas in Murihiku, Southland, having another tool that can support the investments already made in the National Park Buffer zones and reducing the burden of control on landowners would be greatly welcomed. Staff have written a submission in support of the application, attached.

The submission period closes 22nd April 2025.

Risks/Opportunities

Staff are comfortable with the risk assessment completed by Canterbury Regional Council in conjunction with Manaaki whenua, Landcare research and believe the risk of releasing the two listed Darwin's Barberry agents is minimal.

The Murihiku Southland specific risk is negligible and will be a benefit to indigenous biodiversity, landowners controlling Darwin's Barberry and support the investment already made in the National Park buffer zones.

Views of affected parties

Canterbury Regional Council and Maanaki Whenua have completed national and regional consultation with Maori and Iwi. As part of this process, Environment Southland, Environment Canterbury and Otago Regional Council met with Ngāi Tahu HSNO komiti who supplied a risk assessment but asked that we still consult locally. Environment Southland biosecurity staff contacted Te Ao Marama Inc (verbally and written), to notify them of the proposed introduction of the two Darwin's Barberry biocontrol agents and to assist in any engagement and consultation, unfortunately Environment Southland did not receive any responses.

Environment Southland also facilitated engagement using an online submission form in the pre-consultation phase of this application through our community engagement team and online services which were shared with Manaaki whenua and Environment Canterbury for their application.

Fit with strategic framework

OUTCOME	CONTRIBUTES	DETRACTS	NOT APPLICABLE
Managed access to quality natural resources	X		
Diverse opportunities to make a living			X
Communities empowered and resilient			X
Communities expressing their diversity			X

Compliance with Significance and Engagement Policy

There are no issues within this report which trigger matters in this policy.

Considerations

Financial implications

There are no financial implications associated with this report

Legal implications

There are no known implications for this submission.

Attachments

1. Submission form for HSNO applications Dar [**9.1.1** - 3 pages]



Environmental
Protection Authority
Te Mana Rauhi Taiao



Te Kāwanatanga o Aotearoa
New Zealand Government

Submission form: For Hazardous Substances and New Organisms applications

Submission details

What application are you submitting on?: Two biocontrols to combat the weed Darwin's barberry

Organisation or submitter name: Environment Southland

Contact person (for organisations only): Jolie Hazley

Postal address (optional): 220 North Road

City/Region (optional): Invercargill

Telephone number: 021355776

Email: jolie.hazley@es.govt.nz

Privacy statement

The EPA is collecting your personal information for the purpose of administering this application under the Hazardous Substances and New Organisms Act and will use the information you provide in this form to contact you in relation to the application. We will store your personal information securely. Your submission and name will be made publicly available on our website, but your personal contact details will not be disclosed. You have the right to access the personal information we hold about you and to ask for it to be corrected if it is wrong. If you would like to access your personal information, or have it corrected, please contact us at info@epa.govt.nz.

Confidential details

The Official Information Act 1982 (OIA) applies to all information held by the EPA (subject to section 55 of the Hazardous Substances and New Organisms Act 1996), and information may be released under the OIA unless there are grounds to withhold it. If you consider any part of your submission is confidential, please clearly label it as such and include the reasons why you think the information is confidential (eg, you may consider some information to be commercially sensitive). Further information on the OIA is at www.ombudsman.parliament.nz

Your submission

What is your view on what is proposed in the application form?

- ☒ I support the application
- ☐ I oppose the application
- ☐ I neither support or oppose the application

The reasons for making my submission are¹: *(further information can be supplied with your submission, see footnote).*

Darwin's barberry is a pest plant in the Southland Regional Pest Management Plan, we are currently trying to progressively contain this pest plant and stop the spread of it into our national parks. We currently have one Darwin's barberry biocontrol agent established in Southland, however the addition of these two agents will add another effective control tool to a plant that is both financially and physically hard to control, yet can cause so much damage to the ecosystems and farm land in Southland.

I wish for the EPA to make the following decision:

Approve the introduction of these two biocontrol agents for Darwin's barberry

All submissions are taken into account by the decision makers. In addition, please indicate whether or not you also wish to speak at a hearing if one is held.

- ☐ I wish to be heard in support of my submission (this means that you can present your submission to the DMC at the hearing but does not allow you to introduce new information at the hearing)
- ☒ I do not wish to be heard in support of my submission (this means that you cannot speak at the hearing)

If neither box is ticked, it will be assumed you do not want to appear at a hearing.

¹ Further information can be supplied with your submission. If you are sending this submission electronically, please attach one or more files in any standard file format.

Send your completed form

You can send us the completed form by either post or email.

Post	Email
 Environmental Protection Authority, Private Bag 63002, Wellington 6140	 submissions@epa.govt.nz

9.2 Retrospective Approval of Past Submissions

Report by: Shana Lee, Policy Planner

Approved by: Rachael Millar, General Manager Strategy, Policy & Science

Report Date: 2 April 2025

Purpose

To seek formal approval of Environment Southland's recent submissions.

Summary

Environment Southland has recently lodged submissions and feedback on Local Government (Water Services) Bill, and two consultations undertaken by the Department of Conservation, titled Exploring Charging for Access to Some Public Conservation Land, and Modernising Conservation Land Management. Formal approval of these submissions is now required, as the submissions were lodged based on unofficial approvals.

Recommendation

It is recommended that the Strategy and Policy Committee resolve to:

- 1 Receive the report - Retrospective Approval of Past Submissions.
- 2 Formally approve Environment Southland's submission on Local Government (Water Services) Bill.
- 3 Formally approve Environment Southland's submission on Modernising Conservation Land Management.
- 4 Formally approve Environment Southland's submission on Exploring Charging for Access to Some Public Conservation Land

Background

Environment Southland's submissions were informed by technical expertise from across the organisation, along with direct feedback from the Council.

Local Government (Water Services) Bill

This Bill is currently being considered by the Finance and Expenditure Committee, with the consultation having closed on 23 February 2025. The Bill is expected to be passed into law by mid-2025.

This Bill provides for arrangements for the new water services delivery system, a new economic regulation and consumer protection regime for water services, and changes to the water quality regulatory framework and the water services regulator.

Environment Southland's submission focused on matters that directly impact our operations as the key regulator of water service infrastructure. Please refer to the attached submission for more details. The key points of this submission were as follows:

- Strong support for proposals intended to strengthen long-term, strategic approach in the management of water services
- Recommendations for strengthening the strategic approach
- Recommendations for providing for greater iwi involvement
- Refine the settings around national standards for stormwater and wastewater management to provide for necessary flexibility.

Modernising Conservation Land Management & Charging for Access to Some Public Conservation Land

These consultations were undertaken by the Department of Conservation to inform the ongoing partial reform of the conservation law. They closed on 28 February 2025. It is unclear when the associated bill will be released.

Modernising Conservation Land Management

The key proposals discussed regarding modernising conservation land management included proposals to simplify and streamline conservation legislation, improve the concession system, improve performance outcomes from concessions, and engage with Iwi on approvals for “classes of activities” rather than individual applications. Furthermore, it was proposed that greater flexibility be introduced for public conservation land exchanges and disposals.

In the submission, Environment Southland expressed support for the overall objective of modernising conservation land management, streamlining conservation management system and speeding up concession processing, while highlighting the need for critical refinement of some proposals. However, significant concerns were expressed regarding the introduction of increased flexibility for the exchange and disposal of conservation land.

Charging for Access to Some Public Conservation Land

The consultation document raised several questions, including whether access charges should be introduced for high-demand areas, who should be liable for these charges – New Zealand visitors, international visitors, or both – what discounts, if any, should apply, and how the revenue should be allocated. Specifically, should all or a reasonable proportion of the access charge revenue be reinvested in the areas where it was collected?

In its submission, Environment Southland expressed support for the proposal to extend the basis for charging access fees, with a preference that the revenue collected be reinvested in the region from which it was generated.

Risks/Opportunities

There are no significant risks or opportunities identified in this report.

Views of affected parties

Staff are unaware of any disapprovals or concerns expressed by relevant stakeholders.

Fit with strategic framework

OUTCOME	CONTRIBUTES	DETRACTS	NOT APPLICABLE
Managed access to quality natural resources			X
Diverse opportunities to make a living			X
Communities empowered and resilient			X
Communities expressing their diversity			X

Compliance with Significance and Engagement Policy

This work does not trigger the requirements of this policy.

Considerations

Financial implications

Staff have not identified any direct financial implications associated with the submissions.

Legal implications

Staff have not identified any direct legal implications arising out of this matter.

Attachments

1. 2025 02 20 Submission on Local Government (Water Services) Bill [**9.2.1** - 5 pages]
2. 2025 02 25 ES submission on Modernising Conservation Land Management [**9.2.2** - 16 pages]
3. 2025 02 25 ES submission on Exploring Charging for Access to Some Public Conservation Land [**9.2.3** - 4 pages]

Our Reference: A1233315

21 February 2025

Finance and Expenditure Committee
Parliament Buildings
Wellington



Environment Southland's Submission on Local Government (Water Services) Bill

Introduction

1. The Southland Regional Council, trading as Environment Southland (Environment Southland), welcomes the opportunity to participate in the consultation on Local Government (Water Services) Bill (the Bill). This Council plays a crucial role as a key regulator in the Southland region, working to minimise environmental effects of activities associated with drinking water supply, and wastewater and stormwater discharges, while supporting territorial authorities in the provision of essential services to the Southland communities.
2. Environment Southland acknowledges the significant challenge of addressing New Zealand's water infrastructure issues. We believe that a comprehensive approach, including a strong regulatory framework and funding support for local government, will be essential to resolving these issues. We support the intention of the Bill to provide a regulatory system that improves water service quality, achieves greater cost efficiency, and promotes consumer protection. However, the Council has identified several concerning aspects in the framework's design that need to be improved to increase the likelihood of successful implementation and ensure optimal outcomes.
3. In preparing this response, Council focused on the issues that are directly relevant to the operation of regional councils. We note that this submission is being provided on a without prejudice basis pending final approval at the next available Council meeting.
4. In summary, the key points of this submission are:
 - Strong support for proposals intended to strengthen long-term, strategic approach in the management of water services
 - Recommendations for strengthening the strategic approach
 - Recommendations for providing for greater iwi involvement
 - Refine the settings around national standards for stormwater and wastewater management to provide for necessary flexibility.

For now
& our future

Cnr North Rd & Price St, Invercargill | DX No. YX20175 | Private Bag 90116, Invercargill 9840 | 03 211 5115 or 0800 76 88 45 | service@es.govt.nz | www.es.govt.nz

Enhancing Strategic Approach

5. Environment Southland recognises the significant challenge of maintaining water infrastructure and therefore commends the Bill for its focus on fostering a more strategic approach to the management of the essential infrastructure. The proposals requiring a water services strategy, drinking water catchment plans, trade waste plans, and stormwater network risk management plans are particularly notable. These policies could be valuable tools, helping relevant agencies collaborate with stakeholders to assess the costs and resources needed for long-term management of infrastructure, and to plan in advance for the provision of these resources.
6. However, the Council identified several areas where improvements could be made to ensure greater success. First, the water services strategy that water service providers are required to prepare has a planning horizon of 10 years. Given that the lifespan of related facilities spans several decades, this period seems too short. Strategies for the provision of water supply assets should cover a longer-term period to ensure sustainability and effective future planning.
7. International examples show that such strategies are typically designed for 20 to 30 years, with periodic reviews (e.g., every 5 to 10 years) to adapt to changing conditions, population growth, technological advancements, and environmental challenges. For instance, water companies in the UK are required to produce Water Resource Management Plans that cover 25 years and are updated every 5 years. Similarly, several Australian states use Water Supply and Sewerage Strategies that cover at least 20 to 30 years.
8. Additionally, the Council questions the effectiveness of clause 193(3) and (4), which stipulate that the implementation of water services strategies is not mandatory. This stands in contrast to the obligations of local authorities under Section 80 of the Local Government Act 2002 (LGA), which requires councils to publicly explain any failure to meet the goals in their policies and plans. There is no clear justification for this discrepancy, as water service providers are Council-controlled organisations serving the public and should be held accountable for not implementing the relevant strategies. The absence of a binding requirement could significantly undermine the strategic approach, reducing its overall effectiveness.
9. The Council also seeks clarification on clause 196(2)(b), which prevents shareholders of water service providers from having the final say regarding water service strategies. In the absence of a compelling rationale, this position seems problematic, as it would weaken the connection between water service planning and the local communities they serve.

Recommendations

- *Require water service strategies to cover a longer period, such as 25 years.*
- *Introduce accountability measures to ensure water service providers implement water services strategies and successfully deliver the intended outcomes.*
- *Empower shareholders of water service providers to have the final say on water service strategies.*

Strengthening Provisions for incorporating te ao Māori

10. Environment Southland believes the proposed framework would benefit from stronger provisions to better incorporate iwi perspectives, based on the Treaty of Waitangi (the Treaty). While the framework mandates actions to align with Treaty settlements, it falls short of fully leveraging the unique social fabric of New Zealand underpinned by the

Treaty of Waitangi. The Regulatory Impact Statement for the Bill indicates minimal consultation with iwi during the drafting of the current Bill.

11. Some of the key proposals relating to central features appear to lack effective measures for incorporating te ao Māori. For example, the proposed framework does not require the Water Services Authority (WSA) to consider iwi interests in its operations. The Bill only proposes to exclude Te Mana o te Wai from its objectives. Such omission will likely undermine the role iwi play in the operation of the WSA, particularly in the development of national standards for stormwater, wastewater, and drinking water management.
12. Similarly, the Bill imposes a very narrow obligation towards iwi interests on water service providers, which are defined as either territorial authorities or water organisations that have assumed responsibility for providing water services. The duty is to act in accordance with Treaty settlement obligations (Clause 41). These limited provisions may lead to confusion and risk diminishing the Treaty's role in the management of water services.
13. Furthermore, councils and their council-controlled organisations already have various responsibilities toward Māori under the Local Government Act 2002 (LGA) and Resource Management Act 1991 (RMA). Clarification is needed on whether these obligations change when they operate as water service providers.
14. Clearer directives to involve iwi in the management of the water services assets would likely deliver better outcomes in water quality through the incorporation of long-term perspectives, and mātauranga Māori.

Recommendations:

- *Expand an obligation for Water Service Authority and Water Services Providers in relation to iwi rights by requiring consideration of responsibilities under the Treaty of Waitangi.*

Need to refine settings at the interface with RMA

15. The Bill introduces several measures that relax regulatory requirements under the RMA. While the Council acknowledges the importance of enhancing certainty and process efficiency, it is concerned that some of these measures may lead to a further decline in water quality and undermine local democracy. Given that wastewater and stormwater discharges are significant contributors to water quality in Southland's catchments, it is crucial that their impacts on water quality are managed with the utmost care.
16. The fact that environmental standards for wastewater and stormwater are still being developed creates an undesirable level of uncertainty that justifies a more cautious approach in designing the regulatory framework.

Clause 273 amending s104 of RMA: national standards to prevail

17. The Water Services Act introduced in 2021 envisaged that national performance standards for wastewater and stormwater would provide the minimum threshold with regional councils retaining the authority to develop more restrictive standards if desired by the community. However, the proposal in clause 273 of the Bill requires regional councils to apply the single national standards, without leaving room for regional customisation.
18. The Council is concerned that the inability for consents to vary from the standards will mean that local environmental concerns may not be addressed sufficiently or, in the

alternative, that the community may not be able to afford a system that meets the standards.

19. Furthermore, if environmental performance standards for wastewater and stormwater services are more lenient than regional regulations, it could lead to significant equity concerns, exacerbating the divide between rural and urban communities. Rural areas, where discharges from dairy farm effluent systems and onsite wastewater systems are more prevalent, could face stricter requirements, forcing these communities to shoulder higher costs for maintaining or improving water quality in Southland's catchments.
20. Therefore, the Council recommends that the status quo be retained. Should this not be accepted, the framework should include a procedure that mandates the Water Services Authority (WSA) to consult with relevant authorities, including regional councils, within an appropriate timeframe when developing environmental performance standards for wastewater and stormwater.

Clause 274 amending S 105 of RMA: Consideration of alternative methods

21. Clause 274 proposes to amend s 105 so that alternative methods do not need to be considered where an activity is subject to and compliant with wastewater or stormwater environmental performance standards. While acknowledging significant cost involved in consideration of alternatives, Council views that significant scrutiny, debate and criticism on the adequacy of consideration of alternatives are essential to minimise adverse effects, especially when new stormwater and wastewater discharges are being assessed. Given that these are often significant point source discharges in the catchment, consideration of alternatives will be necessary.
22. Therefore, Council recommends the deletion of clause 274. At the minimum, exemption from the consideration of alternative methods should only apply to existing wastewater services infrastructure.

Clause 275 amending s 107 of RMA: Relaxing environmental bottom lines

23. S 107 of RMA establishes environmental bottom lines by prohibiting the granting of discharge permits where certain adverse effects in the receiving waters are anticipated. These effects include the production of grease films, conspicuous colour changes, objectional odours, and any significant adverse effects on aquatic life. Clause 275 of the Bill proposes to amend s 107 to exempt these bottom lines where an activity is subject to and compliant with wastewater or stormwater environmental performance standards.
24. Environment Southland strongly opposes this proposal. Allowing such an exception to s 107 could significantly harm the water quality in Southland catchments, both through localised impacts and cumulative loads. Specifically, community wastewater and stormwater discharges should not be permitted to produce the effects described in s 107(1) after reasonable mixing. Given that most of Southland's stormwater and wastewater systems have already consistently met the current requirements under s 107, the proposed change would offer no benefits to the region and would instead introduce a new risk through lowering standards. Therefore, Council recommends that clause 275 be deleted.

Clause 277 amending s 123(aa) and (ab): 35-year terms

25. The Council expresses strong concerns regarding the proposed 35-year term for consents related to water services. This provision applies a fixed 35-year term when the activity complies with wastewater or stormwater environmental performance standards. By

automatically applying the maximum term, this change removes the ability for consenting authorities to assess and balance risks, uncertainties, and changing environmental conditions against the need for investment security. Given the ongoing uncertainty about the strictness of the standards, this change could create significant challenges for infrastructure operators in securing long-term consents. The Council therefore recommends the deletion of Clause 277.

Clause 278 amending s124: Exercise of resource consent while applying for a new consent

26. The Council recommends the removal of clause 278, which appears to be redundant. Section 124 of the RMA already provides the right to continue using a resource consent while applying for a new one. This right is granted if the holder of an existing consent applies for renewal at least six months before the expiry date, with some discretionary flexibility for applications made within three months of expiry. Clause 278, as currently written, would allow operators of water infrastructure to continue operating with expired consents, regardless of whether an application was submitted. The intention behind such proposal remains unclear.

Recommendations:

- *Amend clause 273 to retain the status quo of 'no less restrictive' than national standards. Should this not be accepted, provide for a consultation requirement for WSA with a sufficiently long timeframe.*
 - *Amend clause 274 to limit the application of s105(3) to renewal of consents for stormwater and wastewater discharges.*
 - *Delete clauses 275, 277 and 278.*
27. Council thanks the Committee for considering this submission and looks forward to future opportunities for collaboration.



N G Horrell
Chairman

Our Reference: A1236427

28 February 2025

Department of Conservation
Via email:
landlegislation@doc.govt.nz



Environment Southland's Submission on Modernising Conservation Land Management

The Southland Regional Council, trading as Environment Southland (Environment Southland), welcomes the opportunity to participate in the consultation on Modernising Conservation Land Management. While this submission has been approved by the Council via online communication, it is yet to be formally endorsed. Therefore, this submission is provided on a without prejudice basis pending formal approval from the full Council at the next available meeting.

Please contact Marcus Roy, Government and Policy Manager (Marcus.roy@es.govt.nz) if you have any queries regarding this submission.

Yours sincerely

N G Horrell
Chairman

For now
& our future

Cnr North Rd & Price St, Invercargill | DX No. YX20175 | Private Bag 90116, Invercargill 9840 | 03 211 5115 or 0800 76 88 45 | service@es.govt.nz | www.es.govt.nz

Introduction

1. Effective management of conservation land is very important to the Council. Approximately half of Southland's total area is designated as conservation land. While not directly responsible for maintaining biodiversity within these conservation areas, Environment Southland is responsible for overseeing pest management and the preservation of indigenous biodiversity in the surrounding areas, as well as land and territorial waters outside the conservation estate. Given the interconnected nature of ecosystems, conservation outcomes within protected areas will significantly influence outcomes in the areas we manage.
2. For example, in some areas of conservation estate, pest populations such as pigs and deer may contribute to degradation of water quality. Where catchments extend outside the conservation estate, this can complicate the efforts of the regional council and relevant catchment groups in managing water quality.
3. At the same time, Environment Southland has a strong interest in enabling Southland communities to provide for their social, cultural, and economic well-being, consistent with the purpose of RMA as expressed in s 5. Tourism is an important contributor to the regional economic well-being, and as such, the Council supports development of sustainable tourism that provides for the reasonably foreseeable needs of future generations.
4. The key points of our submission are as follows:
 - a. Support for the overall objective of modernising conservation land management
 - b. Support for streamlining conservation management system and speeding up concession processing subject to critical refining of some of the proposals
 - c. Significant concerns regarding the introduction of flexibility for exchange and disposal of conservation land
5. The abovementioned key points are further elaborated in Part 1, with more detailed answers to each question provided in Part 2.

Part 1: General Comments

6. Environment Southland believes that a comprehensive reform of the entire conservation system will help support conservation priorities. The current proposals seem to address only a small part of the broader picture. While this submission focuses specifically on the questions outlined in the discussion document, the Council strongly recommends that the 'wider work programme' for conservation reform be expedited. This will help ensure that reforms are implemented in a holistic and integrated manner.
7. Council strongly supports the objective of modernising the management of conservation land. The Department of Conservation (DOC), which manages conservation land covering 30% of New Zealand's total land area, has long struggled with insufficient funding, receiving only about 0.44% of the government budget in the latest budget. Addressing issues identified within the process of creating planning documents for managing conservation land and streamlining the concession processing system can help alleviate the pressure on DOC and, through improved efficiency, foster efficient

cooperation among stakeholders, including commercial interests, iwi and members of the public. However, the current proposals raise concerns in certain areas, which are addressed in the following section along with alternative suggestions.

8. Environment Southland expresses caution regarding any relaxation of the regulations surrounding land exchange and disposal. Unlike concessions, which are subject to time limits, land exchanges and disposals result in the permanent loss of conservation land, and therefore must be approached with care. If the current regulations are changed, appropriate safeguards must be put in place to prevent abuse of the process and to ensure that the conservation estate does not gradually diminish.

Part 2: Responses to Consultation Questions

1. Issues

- Key issues outlined
 - The planning system is too complicated.
 - Concession decision takes too long.
 - The Government could get better performance and outcomes from concessions. Concessions for tourism and economic activities on conservation land are typically applied for when needed, but there is uncertainty around the competitive allocation process, despite growing demand for limited opportunities. A clearer framework for competitive allocation, business transitions, and fair contestability could improve outcomes for recreation, the economy, and the environment. Additionally, outdated management tools, disputes over pricing, and limited incentives for concessionaires hinder effective commercial contracts and the ability to achieve better environmental and biodiversity outcomes.
 - The Government has limited flexibility to manage land. New Zealand's regulatory framework for amenities areas and land management is inflexible, making it difficult to balance development, recreation, and conservation priorities effectively.

	Questions	Council position
1	Do you agree with the issues?	Council broadly agrees with the presentation of the issues. Council agrees that the planning system and concession decisions process are outdated and therefore, a review is needed to improve effectiveness.
2	Have any issues been missed?	Protecting and preserving the pristine environment of Southland's conservation estates is a priority for us. While tourism is crucial for regional economic growth, it should not come at the expense of damaging the high-value ecosystems within these estates. Such negative outcomes could exacerbate the biodiversity crisis, weaken resilience against climate change, erode cultural values, and undermine the long-term viability of ecotourism. Therefore, in these areas, the protection of indigenous biodiversity, including pest prevention, must take precedence over other objectives, such as recreational use and economic activities. This priority should be clearly reflected in the framework.

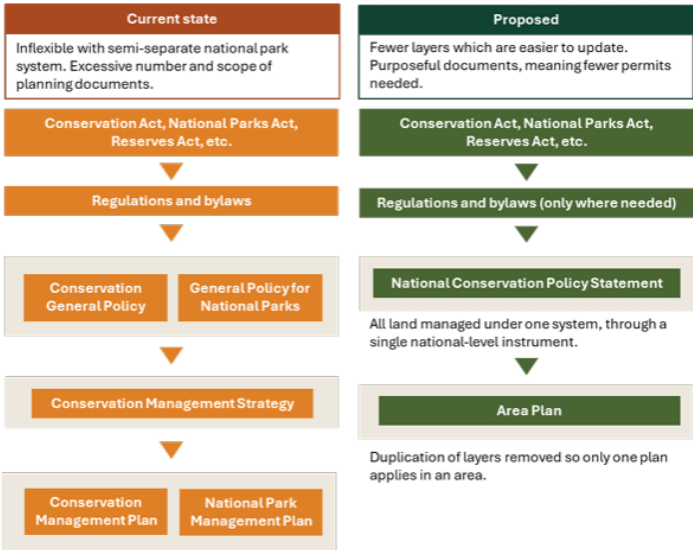
		Furthermore, lack of resource and capacity for the implementation of policies should be identified as one of the fundamental issues that need to be addressed effectively. This must be acknowledged as any change to the framework must be accompanied by the broader system changes to ensure desired outcomes are achieved.
3	Do you have any examples or data that demonstrate your view on the issues?	<p>Council is aware of instances where rigidity of the system prevented changes in status of land that were expected to enhance conservation value and bring practical benefits.</p> <p>The Milford Opportunities work also identified a number of existing problems with tools within the conservation system and government departments which outlined the timeframe for conservation planning, concession timeframes and competing government departments wanting competing outcomes within a space.</p>
4	<p>As you read the proposals in this document:</p> <p>a. Do you think any measures are needed to ensure conservation outcomes, whether in addition to or alongside the proposals?</p> <p>b. Do the proposals allow the Government to strike the right balance between achieving conservation outcomes and other outcomes?</p>	<p>Yes. Council considers that a holistic review of all the components of the conservation system is urgently needed to achieve desirable conservation outcomes. The measures should include provision of sufficient funding for the cause, modernising other legislation impacting on conservation, and review of roles and responsibilities.</p> <p>No. Council does not believe that the current proposals strike the right balance between achieving conservation and other outcomes. Council is particularly cautious about the proposal concerning land exchange and disposal, and has made suggestions in the relevant section.</p>

2. Streamlining the conservation management system

- Key Proposals

- The Conservation General Policy (CGP) and the General Policy for National Parks (GPNP) are proposed to be replaced by a single National Conservation Policy Statement (NCPS).
- NCPS is to set national policy, outline criteria for granting concessions, impose terms and conditions on concessionaires for specific activities at a national level, take a class approach to concessions by exempting, prohibiting or permitting categories of activities in advance.
- Sitting underneath NCPS could be area-based plans without overlapping coverage.

Figure 1. Proposed structure for the management planning system



Area plans will set conservation outcomes for the areas they cover. Concessions would need to be consistent with these.

Where allowed under the NCPS, area plans will implement the proposed class approach to concessions by exempting, prohibiting or permitting categories of activities in advance. They will also set a reasonable limit on the volume of an activity where needed.

- Permit classes of activities to be authorised through national-level and regional-level regulation.
 - Exempt activities: Minimal impact, low risk activities can be carried out without needing a concession. E.g. news media filming on formed tracks, non-extractive research, and hang-gliding zones.
 - Activities permitted in advance: Low risk activities, for which effects assessment can be done in advance, could be permitted in advance with appropriate conditions. E.g. commercial transport in formed car parks, guiding, drone use, harvesting flora.
 - Prohibited activities: Activities with unavoidable effects should be prohibited. E.g. grazing, building structures in kiwi habitats.
- More streamlined processes are proposed for making statutory planning documents. (page 33-34 of the discussion document)

Questions	Council position
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5	<p>Simplifying the management structure</p> <p>a. Do you agree with the issues and how they have been presented?</p> <p>b. Do you agree with the proposed changes to simplify the management planning framework?</p> <p>c. How could this proposal be improved?</p>	<p>Council agrees with the proposal to simplify the management structure as it acknowledges the need to streamline the conservation management planning system.</p> <p>However, it requests caution in designing the specifics of the structure to ensure conservation outcomes are not compromised in the process of introducing efficiency into the system.</p> <p>Council is concerned regarding a statement on page 29 of the consultation document, which notes that ‘areas plans would not be able to impose conditions on activities, unless they are conditions on classes of exempt activities, activities permitted in advance, or within amenities areas’. It views that authority to impose suitable conditions on any activities where needed should be maintained.</p> <p>Council is also concerned that the functions of the NCPS and area plans ‘would be narrower than the current functions of statutory planning documents’. Clarification is needed regarding what this entails.</p>
6	<p>Enabling class approaches to concessions</p> <p>a. Do you agree with the proposal to introduce classes of exempt activities, prohibited activities and permitting activities in advance through the National Conservation Policy Statement and area plans?</p> <p>b. How could this proposal be improved?</p> <p>c. What types of activities are best suited to taking a class approach, and which activities would a class approach not be appropriate for?</p>	<p>Council agrees with the proposal to introduce ‘exempt activities’ and ‘prohibited activities’, but opposes ‘permitting activities in advance’ unless compliance monitoring can be ensured.</p> <p>Using classes of exempt activities and prohibited activities appears to be a relatively straight forward tool for enhancing efficiency of the process.</p> <p>On the other hand, allowing activities with more than minimal impact based solely on adherence to preset conditions carries significant risks of unintended adverse effects. This caution aligns with the Council’s experience as a regulator within the RMA planning system. Effectively dealing with non-compliance with permitted activity conditions can be difficult where</p>

		<p>Council's ability to undertake monitoring is limited by the lack of funding. Therefore, effective funding mechanisms for compliance monitoring, coupled with sufficient authority for relevant enforcement bodies, are crucial for ensuring the system operates as intended.</p> <p><i>Recommendations:</i></p> <ul style="list-style-type: none"> - <i>Include as permitted activity actions of regional councils, whether undertaken directly or through a contractor, with appropriate conditions to be determined in collaboration with regional councils</i> - <i>Maintain a narrow scope for 'permitted activities in advance' given the significant risk of degradation of ecosystems within the conservation estates.</i> - <i>Establish mechanisms and allocate adequate resources for monitoring and enforcing compliance with conditions for 'permitted activities in advance'. This classification should not progress unless such resources can be secured with certainty.</i>
7	<p>Proposed process for making statutory planning documents</p> <p>a. Do you agree with the proposed processes for making, reviewing and updating the National Conservation Policy Statement?</p> <p>b. Do you agree with the proposed processes for making, reviewing and updating area plans?</p> <p>c. How do you think these processes could be improved?</p>	<p>Council supports streamlining the process for developing and revising the National Conservation Policy Statement (NCPS). However, it notes several areas of concern.</p> <p>Firstly, it is concerned about the reduction of the role of the New Zealand Conservation Authority (NZCA). The proposal is to remove the role of NZCA in producing the first draft for consultation, and in reviewing the revised policy before it is sent to the Minister for approval.</p> <p>NZCA is an independent statutory body established under the Conservation Act 1987, which has been playing a key advisory and oversight role in the conservation system. It is made up of 12 appointees, who reflects a range of expertise and perspectives, including conservation, ecology, environmental law, Māori interests, or other related fields.</p>

		<p>The role of this body of experts in the development of NZCA should be maintained to ensure that the evidential base is robust and is reflective of diverse perspectives.</p> <p>Secondly, the proposal is to remove the requirement of Director-General to notify all regional councils after a draft has been prepared. Council requests that this step facilitating direction engagement with regional councils is retained in recognition of the important role regional councils play in the management of conservation estates.</p> <p>Additionally, it is noted that engagement would not be necessary for minor or technical changes, or changes already consulted on. Council believes it is essential to establish clear definitions and criteria to prevent the bypassing of engagement in cases of amendments with more than a minor impact.</p> <p><i>Recommendations:</i></p> <ul style="list-style-type: none"> - <i>Maintain the role of the NZCA and conservation boards within the statutory planning framework to ensure that planning documents will be grounded in a robust conceptual foundation, informed by diverse perspectives, and that they adequately reflect the local context.</i> - <i>Retain the requirement for Director-General to notify all regional councils after a draft has been prepared, given the multiple roles regional councils play within and outside the conservation estates.</i>
8	<p>Giving effect to Treaty principles when making statutory planning documents</p> <p>a. Do you think the proposals are appropriate to give effect to the principles of Te Tiriti o Waitangi / the Treaty of Waitangi?</p> <p>b. What else should the Government consider to uphold existing Treaty settlement redress?</p>	<p>While the details provided within the discussion document are not sufficient to enable Council to make an informed assessment of this aspect, Council notes that the reduction in NZCA's role will likely diminish the influence of iwi perspectives in the development of planning documents. This impact should be taken into account when reviewing the system.</p>

		<p><i>Recommendations:</i></p> <ul style="list-style-type: none"> - <i>Maintain the role of NZCA</i> - <i>Directly engage with iwi to ensure their perspectives are effectively integrated into the design of the system</i>
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3. Speeding up concession processing

- The Government proposes clarifying that the Minister could also decline applications at this early stage if the applicant:
 - does not have the financial means to execute the concession, or
 - has demonstrated previous non-compliance with concessions.
- Scope may exist to clarify that engagement on individual applications is not needed when:
 - Treaty partners have stated that engagement is not required on certain categories of activities, and/or
 - the application proposes only minor changes to existing or previous concessions.
- Statutory time frames for key steps in the process can improve timeliness and efficiency. The Minister of Conservation has introduced targets for DOC to streamline concession application processing. While some time frames already exist, additional ones could be considered for DOC's decision-making on concessions. DOC could require applicants to provide further information within 10 working days or a longer specified period. A time frame for Treaty partner engagement could also be introduced, with a 20-working-day response period, or longer for more complex applications. If no response is received, decisions could proceed with existing information. Improved planning and ongoing engagement with iwi can reduce the need for extensive responses on individual applications.

	Questions	Council Position
9	<p>Improving the triage of applications</p> <ul style="list-style-type: none"> a. Do you agree with the issues in concessions processing and how they are presented? b. Do you agree with how the Government proposes to improve triaging of concession applications? c. How can this proposal be improved? <p>What should DOC consider when assessing whether an applicant may not have the financial means to execute a concession?</p>	<p>Council supports the proposal to triage applications as it is anticipated to relieve the resourcing pressure on DOC and improve the overall effectiveness of the system.</p> <p>Council also supports the provision of power to decline applications where history of non-compliance exists.</p>

10	Clarifying Treaty partner engagement requirements How can the Government best enable Treaty partner views on concession applications (e.g. whether Iwi are engaged on all or some applications)?	Use of efficient process co-designed with Treaty partner and provision of funding and other resources would be essential to support treaty partner's engagement in processing of concession applications.
11	Creating statutory time frames for some steps Do you agree that additional statutory time frames should be introduced, including for applicants (to provide further information) and Treaty partners?	The Council does not support imposing a strict 20-working-day timeframe on Treaty partners for considering concession applications, as it risks undermining the ability of iwi and hapū to fully participate and influence outcomes. The Council recommends that this proposal be accompanied by the option to request an extension when necessary, along with provisions for resources to support informed participation.
12	Amending when public notification must happen a. Would it be more beneficial if DOC notified only eligible applications where the intention is to grant a concession? b. Do you think any other changes to public notification should be considered?	<p>Council does not support the proposals at paragraph 6.4 of the discussion document to limit public notification. The proposal is to limit public notification to where the intention is to grant a concession. It is considered that such arrangement may lead to inefficiency in the process and compromise quality of decision as the decision maker, DOC, will not benefit from public input early in the process before forming a decision on an application.</p> <p>Council also opposes reducing public notification requirements for some types of longer-term licenses. Long term licenses such as grazing licenses should not be allowed to continue without adequate public scrutiny given the evolving nature of physical and social environments.</p>
13	Clarifying the reconsideration process a. Do you agree with setting time frames and limits on reconsiderations? b. How can this proposal be improved?	Council supports the proposal that applicants can only apply for reconsideration once, as it would enhance efficiency of the system.

4. Driving better performance and outcomes from concessions

- Key Proposals: It is proposed that the system move away from the current first-come, first-served basis to a competitive allocation regime using the criteria shown below.

Criteria	Description
Performance	<ul style="list-style-type: none"> • Applicants' experience and compliance record. • Financial sustainability of applicant (and activity if alternative proposals). • Capability of meeting any environmental or cultural conditions.
Returns to conservation	<ul style="list-style-type: none"> • Financial returns to the Crown. • In-kind returns to conservation (e.g. pest control). • Contribution to conservation, scientific, and mātauranga research.
Offerings to visitors	<ul style="list-style-type: none"> • The quality of experience offered to customers. • Readiness of the applicant to begin their operation. • How it meets the vision and outcomes for the place.
Benefits to the local area	<ul style="list-style-type: none"> • Employment or training opportunities. • Enhance the cultural, historic or conservation narratives at place. • Building authentic relationships with tangata whenua and communities.
Recognising Treaty rights and interests	<ul style="list-style-type: none"> • Importance of taonga (resource or land) to the activity. • Utilises and enhances kaitiakitanga, connection to whenua, and customary practices (may include modern technology). • Promotes general awareness of tikanga and mātauranga Māori.

Question	Council position
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14	<p>Enabling competitive allocation of concession opportunities</p> <p>a. Do you agree with the issues and how they have been presented?</p> <p>b. Do you agree with the proposed criteria to guide when concession opportunities are competitively allocated?</p> <p>c. How can the proposed criteria be improved for when an opportunity should be competitively allocated?</p> <p>d. Are there any situations in which competitive allocation should not occur, even if the criteria are satisfied?</p> <p>e. f. Do you agree with the proposed criteria to guide how concession opportunities are allocated?</p> <p>How can the proposed criteria be improved for how allocation decisions should be made?</p> <p>g. What are your views on ensuring a fair valuation of assets when transferring a concession?</p> <p>h. How can the interests of existing operators and potential new operators both be fairly met in exclusive commercial opportunities?</p>	<p>Council supports the objective of enabling competitive allocation of concession opportunities. If the settings are set right, it can incentivise applicants to design their projects in a way that bring desirable public benefits while minimising adverse environmental effects.</p> <p>However, Council believes that the proposed criteria is not amenable to achieving the desired result and therefore needs to be reviewed. The criteria should apportion higher weighting to 'returns to conservation', reflecting the purpose of the Conservation Act.</p> <p>Additionally, the financial sustainability of applicants should be assessed to ensure they meet the minimum requirements, rather than favouring corporations with the deepest pockets, in order to maintain a fair playing field.</p>
15	<p>Modernising contractual management of concessions</p> <p>a. Do you agree that the proposed National Conservation Policy Statement could guide things like standardised terms and conditions, term lengths, and regulated concession fees?</p> <p>b. What are your views on setting standard terms and conditions for concessions?</p> <p>c. What circumstances and activities might justify longer or shorter term lengths?</p> <p>d. What are your views on setting activity fees based on a fair return to the Crown rather than market value?</p> <p>e. What are your views on setting standardised, regulated fees?</p> <p>f. What are your views on changing the frequency of activity fee reviews?</p>	<p>Council supports setting activity fees based on a fair return to the Crown rather than market value.</p>

5. Unlocking amenities areas to protect nature and enhance tourism

Key Proposals:

- Currently 26 amenities areas are in existence – 22 under the Conservation Act 1987 and four under the National Parks Act 1980 – one in Aoraki/Mount Cook village and three in Tongariro National Park for Tūroa ski field, Whakapapa ski field, and Whakapapa Village.
- However, the existing tools have shortcomings and are inconsistent in what they provide for. The Government cannot use the tools to tackle growing congestion in the country's iconic national parks. Amenities areas can only be established in national parks by the Minister of Conservation on the recommendation of the NZCA. They also do not fully provide for a more modern spatial planning approach, with finer controls on development to foster sustainable economic growth and cater for visitor services.
- The Government proposes amending legislation to:
 - create a single 'amenities area' tool
 - better integrate the concept into the planning system
 - enable the Minister to establish an amenities area in a national park without requiring the recommendation of the NZCA as part of a more strategic approach to regulating and managing concessions.

	Questions	Council Position
16	Do you agree with the issues relating to amenities areas and how they have been presented?	Council acknowledges the need to provide for amenities areas within the conservation estates in some circumstances to support development of ecotourism. For example, Council recognises that there is a need to establish and maintain infrastructure for tourism activities within Milford Sound. There have been ongoing discussions between relevant stakeholders and authorities within Southland regarding this matter.
17	Do you agree with the proposal to create a single amenities area tool?	
18	How can this proposal be improved?	
19	What should the main tests be to determine if an amenities area is appropriate?	<p>Council considers that any easing of the restrictions should be undertaken with caution as it would risk loss of ecological values, which is usually irreversible. Determining amenity areas should be a comprehensive and holistic exercise involving spatial planning processes and collaboration with relevant stakeholders. It should not be undertaken in an ad hoc manner.</p> <p><i>Recommendations:</i></p>

		<ul style="list-style-type: none"> - Provide mechanisms for DOC to lead the development of strategic plans for iconic destinations, including Milford Sound. - Utilise spatial planning processes to help inform amenity areas including priorities, values and actions which will make decision making more holistic.
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6. Enabling more flexibility for land exchanges and disposals

Currently, the Conservation Act 1987 and Reserves Act 1977 only allow disposal of stewardship land or reserves respectively, and not land with other protected status. The Conservation General Policy restricts disposals to land with no or very low conservation values.

Key Proposals:

- allow eligible areas to be exchanged or disposed of directly without having to revoke their status and reclassify them as stewardship land first, where a net conservation benefit exists
- restrict disposals to situations where land is surplus to conservation needs
- remove the threshold that only land of no or low conservation value can be exchanged, noting the most precious land is off limits (see below)
- enable the potential for continued protection for land that is given up, where appropriate, through instruments such as covenants
- enable exchanges in a wider range of circumstances by changing the Conservation Act 1987 requirement to protect specific conservation values in an exchange in favour of a requirement that a transaction would result in an overall net conservation benefit.

Public conservation land is not eligible for disposal where:

- it has international or national significance (for example a site like Tāne Mahuta in the Waipoua Forest)
- is a national reserve (under the Reserves Act 1977)
- is an ecological area (specially protected under the Conservation Act 1987)
- or is land within Schedule 4 of the Crown Minerals Act 1991.

	Questions	ES Position
20	Land exchanges	

	<p>a. Do you agree with the issues and how they have been presented?</p> <p>b. Do you agree with the proposal to enable more flexibility for exchanges where it makes sense for conservation?</p> <p>c. How could this proposal be improved?</p> <p>d. What should be included in the criteria for a net conservation benefit test for exchanges of public conservation land?</p> <p>e. Are there criteria that should not be considered in a net conservation benefit test for disposal of public conservation land?</p> <p>f. Should a net conservation benefit test for exchanges of public conservation land include meeting Iwi aspirations (for example, returning sites of significance to Iwi)?</p>	<p>While acknowledging the inconvenience and inefficiency that comes with rigid systems, Council expresses concern regarding reviewing the rules around land exchanges and disposals. Therefore, it opposes the proposals in their current form.</p> <p>The proposal to use a 'net conservation benefit test' for exchanges of public conservation land represents a much more permissive approach compared to the current 'no or low conservation value' test. The Council opposes this proposal, as the challenges in assessing ecological values and predicting the consequences of disturbing ecological systems require a precautionary approach. Lowering the threshold could lead to unintended damage to ecosystems.</p>
21	<p>Land disposals</p> <p>a. Do you agree with the issues and how they have been presented?</p> <p>b. How could this proposal be improved?</p> <p>c. Do you agree with the proposal to enable more flexibility for disposals where it makes sense for conservation?</p> <p>d. When should the Crown have the ability to dispose of public conservation land and for what reason(s)?</p> <p>e. What should be included in the criteria for a net conservation benefit test for disposals of public conservation land?</p> <p>f. Are there criteria that should not be considered in a net conservation benefit test for disposal of public conservation land?</p> <p>g. Should a net conservation benefit test for exchanges of public conservation land include meeting Iwi aspirations (for example, returning sites of significance to Iwi)?</p>	<p>Additionally, the proposal to restrict disposals to 'land that is surplus to conservation needs' appears to be too vague. Given the threatened status of many species, conservation needs require a more inclusive approach, making it difficult to identify land that could be considered surplus.</p> <p>Furthermore, it is unclear how the aim of providing 'continued protection for land' through mechanisms such as covenants can be effectively achieved.</p> <p>It is recommended that, if the settings are to be adjusted, necessary checks and balances are put in place to minimise the risk of loss of conservation land.</p> <p><i>Recommendations:</i></p> <ul style="list-style-type: none"> - Retain the 'now or very low' test for land disposals. - Require public notice and formal public consultation.

Our Reference: A1236547

28 February 2025

Department of Conservation



Environment Southland's Submission on Charging for Access to Some Public Conservation Land

The Southland Regional Council, trading as Environment Southland (Environment Southland), welcomes the opportunity to participate in the consultation on Charging for Access to Some Public Conservation Land. While this submission has been approved by the Council via online communication, it is yet to be formally endorsed. Therefore, this submission is provided on a without prejudice basis pending formal approval from the full Council at the next available meeting.

Please contact Marcus Roy, Government and Policy Manager (Marcus.roy@es.govt.nz) if you have any queries regarding this submission.

Yours sincerely

N G Horrell
Chairman

For now
& our future

Cnr North Rd & Price St, Invercargill | DX No. YX20175 | Private Bag 90116, Invercargill 9840 | 03 211 5115 or 0800 76 88 45 | service@es.govt.nz | www.es.govt.nz

Environment Southland's Submission on Charging for Access to Some Public Conservation Land

Introduction

1. Effective management of conservation land is very important to the Council. Approximately half of Southland's total area is designated as conservation land. While not directly responsible for maintaining biodiversity within these conservation areas, Environment Southland is responsible for overseeing pest management and the preservation of indigenous biodiversity in the surrounding areas, as well as land and territorial waters outside the conservation estate. Given the interconnected nature of ecosystems, conservation outcomes within protected areas will significantly influence outcomes in the areas we manage.
2. For example, in some areas of conservation estate, pest populations such as pigs and deer may contribute to degradation of water quality. Where catchments extend outside the conservation estate, this can complicate the efforts of the regional council and relevant catchment groups in managing water quality.
3. At the same time, Environment Southland has a strong interest in enabling Southland communities to provide for their social, cultural, and economic well-being, consistent with the purpose of RMA as expressed in s 5. Tourism is an important contributor to the regional economic well-being, and as such, the Council supports development of sustainable tourism that provides for the reasonably foreseeable needs of future generations.
4. Please note that responses have been provided where Council holds significant views.

Responses to Consultation Questions

Part 3 – Issues

1. Do you agree with the issues and how they have been presented?

The Council generally agrees with the issues presented but emphasises that achieving stronger conservation outcomes must be the primary objective in all reforms and reviews of New Zealand's conservation system. Conservation should not merely be one of the factors considered, but the central focus of the review process.

2. a. Have any issues been missed? Do you have any examples or data that demonstrate your view on the issues?

Milford Opportunities work Council has recently participated in highlighted an urgent need to provide means for establishing and maintaining infrastructure to support the high number of visitors to the area.

Part 4 – Access charging – part of the solution?

3. Do you support the Government introducing the ability to charge for access to some parts of public conservation land? Why or why not? Could you share any evidence or data that has informed your opinion?

Yes. Council recognises that there is an increasing need to manage the areas that visitors use. The existing mechanisms to provide revenue, often tied to the use of facilities, are not sufficient.

5. Do you agree with the assessment of voluntary and concessionaire-based access charges?

Yes. Council agrees that voluntary and concessionaire-based access charges are not sufficient to provide regular streams of funding needed to protect ecosystems and maintain necessary infrastructure.

Part 5 – Who should pay an access charge?

6. To what extent do you support:

- a. Option A: Charging everyone
- b. Option B: Charging everyone but charging New Zealanders less than international visitors
- c. Option C: Charging only international visitors

Council prefers option B, as it requires all users to contribute, achieving equity among all users, while keeping the barrier to outdoor activities sufficiently low for New Zealanders.

Part 6 – Where should access charging be used?

8. a. Do you agree that the use of access charges should be limited to some areas of public conservation land?

b. If you strongly agree or agree, where should these places be?

Yes. Council agrees that the use of access charges should be limited to some areas. It will be appropriate to charge access fees where visitor numbers are high, leading to increased pressure on the natural environment and infrastructure.

9. a. We have identified the types of locations where access charges could be effective, which may include one or more of the following:

- Places facing unsustainable pressure from visitors
- Places popular with international visitors
- Places with high biodiversity and scenic values
- Places where user groups are defined

Do you agree with the features identified for where access charging could be used?

The Council generally agrees with the identified features as the basis for determining locations. However, it believes that unsustainable visitor pressure should be given higher priority. There should be a clear, standardised formula for assessing the level of pressure, one that incorporates the biodiversity and scenic values within the area.

Focusing on alleviating visitor pressure may result in the redistribution of visitors to other conservation areas that are experiencing less strain.

11. To what extent do you support the 'parks pass' approach?

Council supports such an approach as it can be used to improve accessibility for residents if they can purchase the 'parks pass' at a discounted price.

Part 7 – How should the additional revenue be used?

12. To what extent do you support:

Option A: More of the money should be invested at the place it is collected in

Option B: More of the money should be invested within the region it is collected in

Option C: Invest the money in priority projects across New Zealand, regardless of where it is collected

Council prefers option B, as this option aligns with the area-specific approach used in determining locations to apply access charge.

Part 8 – Working with Iwi (and Hapū)

14. How can the Government best meet its Treaty obligations in designing and implementing access charging?

Council recognises that conservation is very important to Treaty partners and believe that Treaty obligations must be upheld when reviewing the conservation system. Therefore, when designing the access charge system, we recommend that DOC engage directly with mana whenua to ensure their views are actively incorporated.

9.3 Update on Government Policy

Report by: Strategy, Policy & Science Group

Approved by: Rachael Millar, General Manager Strategy, Policy & Science

Report Date: 2 April 2025

Purpose

The purpose of this item is to receive an update from staff on recent Government policy announcements and the potential implications of these announcements for Environment Southland.

Report

The Government's 2025 Quarter 1 Action Plan contained the following actions, which are due by 31 March:

- Take Cabinet decisions on the major legislative architecture for the Government's replacement legislation for the Resource Management Act.
- Take Cabinet decisions on new national direction for freshwater and pragmatic rules for on-farm water storage and vegetable growing.
- Take Cabinet decisions on system design for improved and simplified Freshwater Farm Plans.

Government announcements on the first bullet point were released on Monday, 24 March 2025 (see links and detail in Item 9.4 Government Legislation and Policy Monitor).

Staff will make a presentation summarising those announcements and any announcements relating to the second and third bullet points that have occurred before the meeting date, and discuss potential implications.

Recommendation

It is recommended that the Strategy and Policy Committee resolve to:

- 1 Receive the report - Update on Government Policy.

Fit with strategic framework

OUTCOME	CONTRIBUTES	DETRACTS	NOT APPLICABLE
Managed access to quality natural resources	x		
Diverse opportunities to make a living	x		
Communities empowered and resilient	x		
Communities expressing their diversity	x		

Attachments

Nil

9.4 Government Legislation and Policy Monitor

Report by: Shana Lee, Policy Planner

Approved by: Rachael Millar, General Manager Strategy, Policy & Science

Report Date: 2 April 2025

Purpose

To provide a comprehensive overview of the current and upcoming national policy changes, with a focus on those expected to significantly impact on Environment Southland's operations and the Southland region.

Summary

Additions to the previous version of the Government Legislation and Policy Monitor have been marked in red for your convenience.

Recommendation

It is recommended that the Strategy and Policy Committee resolve to:

- 1 Receive the report - Government Legislation and Policy Monitor.

Fit with strategic framework

OUTCOME	CONTRIBUTES	DETRACTS	NOT APPLICABLE
Managed access to quality natural resources			X
Diverse opportunities to make a living			X
Communities empowered and resilient			X
Communities expressing their diversity			X

Attachments

1. 2025 03 26 Government Policy and Legislation Monitor - final [9.4.1 - 23 pages]

Government Policy and Legislation Monitor

Updated: 26 Mar 2025

This monthly document monitors the most significant of the policy and legislation changes the coalition government is driving across various areas. All information is publicly available or received via formal channels such as letters from ministries and correspondence from LGNZ, Taituarā, and Te Uru Kahika. To make it easier to follow, updates to the previous version have been marked in red.

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The following colour coding is used throughout:

Resource Management /Coastal

Climate Change and Biosecurity

Te Tiriti/Te Ao Māori

Transport and other Infrastructure

Primary Industries

Other topics


The format is as follows:

Policy area	
Legislation/policy name	Announcements, dates, and signals
	ES staff involvement and implications and next steps

Updates

1. Resource Management	
Overview of RMA reform programme	<p>The Coalition Government has committed to a three-phase reform of the resource management system, as follows:</p> <p>Phase 1: repeal the Natural and Built Environment Act (NBA) and Spatial Planning Act (SPA) (complete);</p> <p>Phase 2A: progress the Fast-Track Approvals Bill, a consenting and permitting regime for regionally and nationally significant projects (complete);</p> <p>Phase 2B: progress targeted legislative changes to the Resource Management Act 1991 (RMA), along with proposals to amend, review or develop many national direction instruments (in progress); and</p> <p>Phase 3: replace the current RMA with new resource management legislation.</p>
	<p>The ‘three phase’ language is a useful tool for understanding the components of the work programme. The impact and outlook for Environment Southland are outlined in separate discussions below.</p>
Fast-Track Approvals Act (Phase 2A)	<p>The Fast-track Approvals Act commenced in December 2024 to provide a streamlined 'one stop shop' decision-making process to facilitate the delivery of infrastructure and development projects with significant regional or national benefits. The Ministry for the Environment has more information on their website.</p> <p>The Act contains a list of 149 regional and national projects. Substantive applications for projects 'listed' in the Act to use the fast-track approvals process and referral applications for other projects to use the process are being accepted from 7 February 2025.</p>

	<p>In Southland, there are four projects listed in the Act being:</p> <ul style="list-style-type: none"> - Invercargill City Council – infrastructure project to establish an alternate water supply for the city - Sanford Limited – aquaculture project to establish a hatchery at Makarewa - Ngāi Tahu Seafood – Aquaculture project to develop the Hananui open ocean marine farm - Impact Marine Bluff – Aquaculture project to construct a land-based salmon farm in Bluff. <p>On 13 March 2025, the ministers announced the first completed applications accepted by the EPA for consideration by expert panel.</p>
	<p>The Bill is likely to have a significant impact on Environment Southland’s operations, and the Southland region’s future development. Large-scale development projects that would typically require resource consents may proceed more swiftly, while some projects that might not have been initiated otherwise could now move forward. Resourcing implications for Environment Southland could also be substantial, as it will have the responsibility to monitor and enforce the consents granted through the fast-track process.</p> <p>To date, the Consents team has been contacted regarding several of the current listed projects as part of the required preliminary consultation stage.</p> <p>It remains to be seen how many future large-scale projects will opt to utilise the FTA process compared to the standard 'track' resource consent process, for which ES would be the decision-maker.</p>
<p><i>RM (Consenting and Other System Changes) Amendment Bill</i></p> <p><i>(Phase 2B – RM Amendment Bill No.2)</i></p>	<p>On 17 December 2024, this Bill had its first reading and was referred to the Environment Select Committee. This bill amends the Resource Management Act 1991(RMA) to progress Government priorities, including making it easier to consent new infrastructure, encouraging investment in renewable energy, and making medium-density residential standards optional for councils.</p> <p>Proposed amendments include:</p> <ul style="list-style-type: none"> • empowering the Minister to direct a council to initiate plan changes, and • empowering the Minister to direct the type of planning process councils must use to implement national direction • changes to s70 of the RMA to enable the continued management of discharges through permitted activity rules, in circumstances where significant adverse effect on aquatic life exist • clarifying the circumstances in which regional councils can control fishing methods to achieve biodiversity outcomes • strengthened compliance and enforcement powers • changing how applications to change the conditions of a marine aquaculture permit are to be assessed • extending durations for coastal permits for Ports to 2046 • changes to enable a 35-year consent duration as the default presumption for long-lived infrastructure and renewable energy projects • one-year consent processing timeframes for renewable energy and wood processing consents • changes to the national Freshwater Farm Plan system to enable industry organisations to undertake certification and audit processes

	<ul style="list-style-type: none"> changes to better enable regulation-making powers following emergencies. <p>Submissions have now closed and the Select Committee report back to the House is due on 17 June. The Bill is expected to pass into law in mid-2025.</p> <p>This Fact Sheet summarises the changes in the Resource Management (Consenting and Other System Changes) Amendment Bill in five broad categories</p>  <p>Source: Ministry for the Environment (Nov 2024)</p>
	<p>The proposals in the Bill, if enacted, are expected to significantly impact both Environment Southland's operations and the broader Southland region. Environment Southland's submission provided a submission to the committee (Objective ID: A1221000) and spoke to the select committee during a formal hearing on 13 March 2025.</p>
<i>National Direction Programme (Phase 2 B)</i>	<p>The Minister for RMA Reform, Chris Bishop, indicated that, aside from the "straightforward priority amendments" that will be included in the RMA amendment Bills, all other work on national direction will be combined into a single programme.</p> <p>The programme will likely include the development of 7 new National Direction instruments, and amendments to 14 existing instruments. The programme will be delivered in 4 packages, with formal consultation for each package beginning concurrently. Formal consultation is planned for early to mid-2025.</p> <p>The RMA Reform Minister, Chris Bishop, will be delegated the National Direction-making RMA functions with the exception of the NZ Coastal Policy Statement, which the Conservation Minister has statutory responsibility for.</p> <p>The proposals are intended to deliver objectives for Electrify NZ, Infrastructure for the Future, Going for Housing Growth and Getting Back to Farming. The following list has been provided by the Ministry.</p> <p>Infrastructure and energy</p> <ul style="list-style-type: none"> Amendments to NES-Telecommunications Facilities Amendments to NPS-Renewable Electricity Generation, NPS-Electricity Transmission, NES-Electricity Transmission Activities, so they are more directive and enabling of renewable electricity generation and transmission. New NPS-infrastructure to enable a range of energy and infrastructure projects New NESs for different types of energy generation and infrastructure

	<ul style="list-style-type: none"> Amendments to NZ Coastal Policy Statement <p>Housing</p> <ul style="list-style-type: none"> Amendments to NPS-Urban Development and NPS-Highly Productive Land New National Direction for housing targets, granny flats and papakāinga. New national direction for Natural Hazard Management New national environmental standards for heritage bundled into the housing package. <p>Farming & Primary sector</p> <ul style="list-style-type: none"> Amendments to: <ul style="list-style-type: none"> NPS-Freshwater Management NES-Freshwater Management (including water storage) NPS-Indigenous Biodiversity NES-Commercial Forestry NES-Drinking Water NES-Marine Aquaculture Stock Exclusion Regulations <p>Emergencies & Natural Hazards</p> <ul style="list-style-type: none"> New national direction for natural hazards management
	<p>Staff engagement in the policy development include regular online meetings with the Ministry, as well as targeted one-off webinars featuring technical experts from local councils. It is anticipated that Environment Southland will participate in the statutory process in due course, working closely with other regional and local authorities, Te Uru Kahika, Taituarā and other stakeholders. The implications of some of the proposed changes in specific areas are set out in the next table.</p>
<p><i>RMA replacement legislation (Phase 3)</i></p>	<p>The final component of the Government's reform programme is a permanent replacement for the RMA with two new acts.</p> <p>On 24 March 2025, the Government announced further details of the reform, confirming that the Expert Advisory Group(EAG)'s report will serve as the foundation for the new system. The EAG was established in 2024 to prepare a blueprint to replace the RMA.</p> <p>EAG's report is available here. MFE's factsheet on the proposed reform, which compares the Cabinet's decision to EAG's recommendations, can be found here.</p> <p>Key features of the new system include:</p> <ul style="list-style-type: none"> Two Acts: A Planning Act regulating land use and a Natural Environment Act focused on protecting the environment. Narrowed Effects Management: Based on "externalities," only effects impacting others or the environment will be regulated (e.g., interior layouts or private dwelling configurations are excluded). Property Rights: Land use is presumed enabled unless it significantly impacts others or the environment. Existing rights and expansion of lawful uses are protected. Compensation may apply in some cases. Simplified National Direction: National policy will guide local plans, covering urban development, infrastructure, and environmental matters like freshwater and biodiversity. Environmental Limits: Clearer rules on environmental limits to balance development and protection. Greater Standardisation: Nationally set standards and land use zones streamline the system while maintaining local decision-making on key issues.

	<ul style="list-style-type: none"> • Spatial Plans: Each region will have a plan identifying urban areas, public investment priorities, and infrastructure. • Streamlined Council Plans: A combined plan will cover spatial, environmental, and local planning needs. • Stronger Compliance Monitoring: A national regulator will oversee environmental compliance, improving current regional council efforts.
	<p>Replacing the RMA will significantly impact Environment Southland, as the RMA has provided the overarching framework for its operations. The specifics of the two new acts, along with the associated policies and standards, will shape the extent and nature of the required changes. These changes are expected to be far-reaching, affecting all operational areas of Environment Southland, including planning, consents, and compliance teams.</p> <p>It is anticipated that Environment Southland will continue to engage with MfE, and actively participate in the formal parliamentary procedures once the relevant bills become available, working closely with other regional and local authorities, Te Uru Kahika, Taituarā and other stakeholders.</p>

2. Broad National Direction

<i>Infrastructure and Energy</i>	<p>During an online presentation held on 28 November, Ministry for the Environment officials outlined the key aspects of the proposed national policies relating to infrastructure and energy, being:</p> <ul style="list-style-type: none"> • A new NPS-Infrastructure to enable infrastructure projects. • National direction to provide a consistent approach to quarrying – make it easier to obtain consents for quarrying materials like crushed rock, gravel, and sand • Changes to the NES-Telecommunications Facilities will keep up to date with technological developments and give telcos greater certainty and reduced consenting costs as they upgrade their infrastructure. • Amend the National Policy Statements for Renewable Electricity Generation and Electricity Transmission so they are far more directive and enabling of renewable electricity and transmission. • Potentially standards for different types of energy generation and infrastructure.
	<p>Staff are exploring the implications of the proposed changes through collaborations with the Ministry as well as regional and local authorities.</p>
<i>NPS Renewable Electricity Generation</i>	<p>To progress the Coalition Government's commitments to begin doubling renewable energy production, the Government is updating the National Policy Statement on Renewable Energy Generation and National Policy Statement on Electricity Transmission. A relevant Beehive release is linked here. Next steps on Electrifying New Zealand</p> <p>Based on the information provided by the Ministry for the Environment, various proposals are likely to be included in the RM bill No. 2 and the National Direction</p>

	<p>Programme. RM Bill No. 2 included proposals to shorten the consenting process to 1 year, extending the consent lapse period to 10 years, and increasing the minimum consent durations for all relevant consents to 35 years. Additional policy options include providing for 'decision-making in one place', creating a tailored effects management hierarchy system, defining significant environmental values to apply to these activities, and streamlining the consenting process for electricity distribution.</p>
	<p>The proposals are expected to significantly impact both Environment Southland's operations and the communities within Southland, a region with substantial potential for renewable energy projects due to its abundant natural resources. However, there is also a notable risk of adversely affecting areas of high environmental and cultural significance.</p> <p>Staff have been engaging with the Ministry through targeted online meetings and will continue to participate in the discussions.</p>
<i>Housing and Urban Development</i>	<p>During an online presentation held on 28 November, Ministry for the Environment officials outlined the key aspects of the proposed national policies relating to housing and urban development, being:</p> <p>Going for Housing Growth:</p> <ul style="list-style-type: none"> ○ The establishment of Housing Growth Targets for Tier 1 and 2 councils. These targets will require these Councils to "live-zone" feasible development capacity to provide for at least 30 years of housing demand at any one time. ○ New rules that make it easier for cities to expand outwards at the urban fringe ○ A strengthening of the intensification provisions in the NPS-UD ○ New rules requiring councils to enable mixed-use development in our cities ○ The abolition of minimum floor areas and balcony requirements ○ New provisions making the MDRS optional for Councils <p>Changes are also being made to the National Policy Statement for Highly Productive Land.</p> <p>New national direction on granny flats, heritage buildings, and papakāinga housing will be provided.</p>
	<p>Staff are exploring the implications of the proposed changes through collaborations with the Ministry as well as regional and local authorities.</p>
<i>Farming and primary sector change</i>	<p>During an online presentation held on 28 November, the Ministry for the Environment official outlined the key aspects of the proposed national policies relating to farming and primary sector, being:</p> <p>Freshwater</p> <p>Replace the National Policy Statement for Freshwater Management 2020, including enabling vegetable growing and on-farm water storage to support economic and environmental goals.</p>

	<p>Drinking water Existing drinking water standards will be clarified, making it easier for regional councils to implement regulations while adopting a risk-based approach to source water protection.</p> <p>Indigenous biodiversity Policies around indigenous biodiversity will be adjusted to protect the most unique environments without putting undue restrictions on land-use and better support quarrying and mining activities.</p> <p>Commercial forestry Regulations for commercial forestry will be streamlined. This includes reversing parts of the regulations which allowed for increased council discretion for afforestation, and reviewing forestry slash management.</p> <p>Marine aquaculture Changes to s127 of the RMA in respect of the aquaculture industry and marine farms.</p>
	Staff are exploring the implications of the proposed changes through collaborations with the Ministry as well as relevant local authorities.
<i>Emergencies and natural hazards</i>	National Direction on natural hazards, including risks from climate change, is expected to be a single instrument. The new national direction will provide direction to councils on how to identify natural hazards, assess the risk they pose, and how to respond to that risk through planning controls.
	Staff are closely monitoring relevant developments.

3. Land and Water

<i>Freshwater Farm Plans</i>	<p>On 23 October, by passing the Resource Management (Freshwater and Other Matters) Amendment Act, the Government paused the rollout of freshwater farm plans. With the withdrawal of the national regulation, regional rules took centre stage, requiring Southland farmers to have a certified Southland Farm Plan by 27 November 2024 (six months following the Southland Water and Land Plan becoming operative). On 21 November, the Government announced that it is applying an alternate national timeline in Southland, giving farmers further 18 months to comply with the Southland Water and Land Plan rule for certified Southland Farm Plans (until mid-2026).</p> <p>It is expected that cabinet decisions on system design for improved and simplified Freshwater Farm Plans will be taken before 31 March 2025, with freshwater farm plans regulations to be in place by mid-2025.</p>
	<p>Farm plans have long been a cornerstone of Southland's approach to managing environmental contamination risks associated with farming activities and are a key tool in the Southland Water and Land Plan. To comply with the plan, Southland farmers have until mid-2026 to get a certified farm plan. The outcome of the Government's review of national policies on farm plans could potentially affect the implementation of regional farm plan rules in Southland, depending on the specifics of the proposals.</p>

<i>NES Commercial Forestry</i>	On 5 September 2024, the Forestry Minister announced plans to streamline regulations by reversing parts of the regulations that allowed for increased council discretion for afforestation, and by reviewing forestry slash management. It is to be achieved through repealing regulation 6(4A), amending regulation 6(1)(A), and improving slash management standards to clarify rules around low-risk slash.
	The details of the review are expected to become available as part of the National Direction Programme.
<i>NPS Highly Productive Land</i>	In August 2024, the NPS-HPL 2022 was amended. The changes brought in with this amendment support the development of “specified infrastructure”, indoor primary production, and greenhouse activities. It had been signalled that amendments were anticipated to exclude LUC3 land from being classified as highly productive. In the updated version it still contains LUC3 land. A further review of NPS-HPL is planned as part of the National Direction Programme.
	Initial discussions on a regional mapping process for Southland commenced in 2022. This work is still required to be completed by October 2025. Excluding LUC3 land, if the proposal progresses, could significantly impact land use patterns in Southland, as a large portion of the region falls within this category. The land use capability map can be accessed here .
<i>Prohibition on extraction of freshwater for on-selling</i>	The Parliament is currently considering a Bill intended to require councils to classify extraction of freshwater for on-selling as a prohibited activity.
	If passed into law, Southland Water and Land Plan would need to be amended to implement the national direction. Staff will keep a watching brief.

4. Coastal

<i>Review of New Zealand Coastal Policy Statement (NZCPS)</i>	<p>The Ministry of Conservation informed local authorities that NZCPS will be reviewed as part of the National Direction Programme to make it easier to consent new infrastructure, including renewable energy, and enable aquaculture and other primary industries.</p> <p>The key proposals include:</p> <ol style="list-style-type: none"> 1. Strengthening policies 6 and 8 to provide for priority activities, including aquaculture, resource extraction, and specific infrastructure (e.g. renewable electricity generation and transmission); 2. Reviewing the effects management policies for Policies 11 (indigenous biodiversity), 13 (natural character), and 15 (natural features and landscapes); 3. Incorporating changes from interactions with the National Policy Statement (NPS) for Renewable Electricity Generation, NPS for Electricity Transmission, and NPS for Infrastructure; and
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	<p>4. Updating natural hazards policies (Policies 24-27) to align with natural hazards national direction work if necessary.</p> <p>Further details of the proposals are expected to become available mid-2025 as part of the National Direction Programme.</p>
	<p>The proposed shifting of priorities in the management of New Zealand's coastal environment is anticipated to have a significant impact on our region since Southland has a vast coastal area with high natural values, as well as a significant potential for expansion of industries such as aquaculture and mineral extraction.</p>
<i>Offshore Renewable Energy Bill</i>	<p>This Bill was introduced to the Parliament in December 2024, and public submissions to the relevant select committee closed on 6 Feb 2025.</p> <p>The Bill delivers on the Government's commitment to introduce a regulatory regime for offshore renewable energy, as set out in Electrify NZ. It aims to:</p> <ul style="list-style-type: none"> • give developers greater certainty to invest • allow the selection of developments that best meet New Zealand's national interests • manage the risks to the Crown and the public from offshore renewable energy developments. <p>MBIE is currently developing regulations that will sit alongside the Bill. The aim is that the first tranche of regulations will be in place as soon as possible following the passing of the Bill, to enable the opening of the first offshore renewable energy feasibility permit round in late 2025.</p> <p>Please refer to this link for an overview of the proposed regulatory regime. Further information is also available here.</p>
	<p>This proposal is likely to have a substantial impact on the management of marine resources within Southland's coastal waters, with implications for the current review of the regional coastal plan. Environment Southland's submission was lodged with the Transport and Infrastructure Committee within the consultation timeframe (Objective ID: A1230000). We also presented an oral submission to the Select Committee on 13 March.</p>
<i>New Zealand Aquaculture Development Plan 2025-2030</i>	<p>A new plan to grow the aquaculture industry has been released by the Oceans and Fisheries Minister on 8 March 2025. The relevant announcement can be accessed here. It is led by Fisheries New Zealand.</p> <p>The Aquaculture Development Plan is intended to be the roadmap for growing New Zealand's aquaculture industry to \$3 billion in annual revenue by 2035, as set by 2019 Government Aquaculture Strategy. The industry currently generates \$760 million in annual revenue and employs more than 3000 people.</p> <p>The plan outlines the key factors identified for industry growth over the next 10 years, including making the most of existing marine farms, growing production through open ocean aquaculture, supporting Māori leadership in</p>

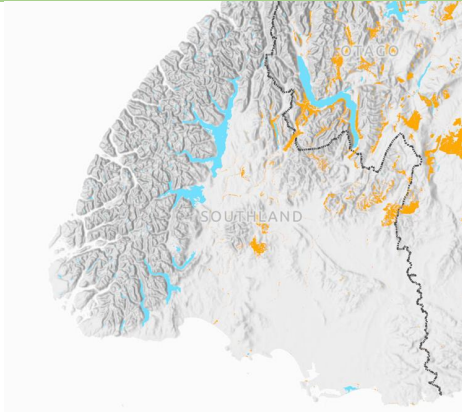
	<p>the sector through the aquaculture settlement, farming new species and supporting new technology.</p> <p>Notably, the Plan outlines the goal of consenting to farm at least 75,000 tonnes of open ocean salmon, by 2035.</p> <p>Read the New Zealand Aquaculture Development Plan 2025 – 2030.</p>
	<p>While aquaculture provides the exciting potential to generate regional economic benefits, the relative lack of knowledge regarding the intricate dynamics within the ocean ecosystems, and the open nature of the ocean environment present significant environmental risks, which must be addressed effectively and well in advance to avoid the repeat of the dairy boom.</p> <p>While the Plan does not set out any requirements for Environment Southland to follow, it is expected to inform the development of national policies impacting on aquaculture activities within Southland's coastal areas.</p>

5. Climate Change

<i>Climate Adaptation Bill</i>	<p>In late 2023, the Environment Committee sought submissions on an inquiry into community-led retreat and climate adaptation funding, started by the previous government. A new climate adaptation inquiry opened in 2024 to develop guiding objectives and principles for the design of a climate adaptation framework for New Zealand.</p> <p>The Committee released its report on 1 October 2024. The 60-pages report provides a diagnosis of the current situation as well as a set of recommendations. The list is available here.</p> <p>On 29 January 2024, the Government published a response to the Report. In the response, it is noted the Government intends to introduce relevant legislation in 2025 to progress the adaptation framework. The Government will also deliver desired outcomes through;</p> <ul style="list-style-type: none"> • National Risk and Resilience Framework (the timeframe is unclear) • RMA National Direction on natural hazards (outlines to be released in April 2025) • Regional Infrastructure Fund for flood resilience projects (\$200 million) • Emergency Management system reform and Emergency Management System Improvement Project (5-year work programme) <p>The Government intends to introduce legislation in 2025 to progress the adaptation framework, potentially alongside amendments to existing legislation, regulations and other non-legislative elements.</p>
	<p>The proposals within this workstream are expected to significantly influence how adaptation initiatives are approached within Southland. Environment Southland staff will continue to keep a watching brief on this work.</p>

<i>Review of biogenic methane targets</i>	<p>The Government has released an independent review on New Zealand's biogenic methane science and target and will now consider the findings alongside the Climate Change Commission's review of the 2050 targets. Please refer to this for more detail on the independent panel's report.</p> <p>The panel's final report on the latest methane science finds:</p> <ul style="list-style-type: none"> • In a scenario where the rest of the world rapidly increases its climate policies to meet the 1.5 degrees warming Paris goal, then reducing New Zealand's biogenic methane emissions by 24% by 2050 would satisfy the goal of achieving no additional warming on 2017 levels by 2050. • In scenarios where global emissions of greenhouse gases do not reduce rapidly in the next couple of decades, a reduction in 2017 biogenic methane emission levels of around 14-15% by 2050 would satisfy the goal of achieving no additional warming on 2017 levels by 2050. <p>It is expected that the Government will introduce a Bill to amend the Climate Change Response Act 2002, which specify the biogenic methane reduction target as 10% by 2030 and 24-47% by 2050 compared to 2017 levels.</p>
	Staff will keep watching brief on this matter and provide updates as developments occur.
<i>Climate Change Response (Emissions Trading Scheme Agricultural Obligations) Amendment Act 2024</i>	This Act commenced on 26 November 2024. It amends the Climate Change Response Act 2002 (CCRA) to remove agriculture activities from the New Zealand Emissions Trading Scheme (ETS).
	The exclusion of agriculture activities from the New Zealand ETS is expected to have substantial implications for the Southland region, as the introduction of agricultural levy was predicted to significantly influence future land use patterns and the makeup of the regional economy. At the national level, investments will be needed to identify and pursue alternative methods for achieving the necessary reduction in GHG emissions, given this Act is likely to encourage the current status quo in land use.
<i>Limiting farm to forestry conversions entering the ETS</i>	<p>On 4 December 2024, the Government announced its intention to limit farm to forestry conversions entering the Emissions Trading Scheme (ETS). A relevant legislation is expected to be introduced in 2025 and enter into force from October 2025.</p> <p>The farm to forestry changes include:</p> <ul style="list-style-type: none"> • A moratorium on exotic forestry registrations for Land Use Classification (LUC) 1-5 actively farmed land. • An annual registration cap of 15,000 hectares for exotic forestry registrations on LUC 6 farmland. • Allowing up to 25% of a farm's LUC 1-6 land to be planted in forestry for the ETS, ensuring farmers retain flexibility and choice.

	<ul style="list-style-type: none"> • The ability for landowners to have their LUC categorisation reassessed at the property level. • Excluding specific categories of Māori-owned land from the restrictions, in line with Treaty obligations, while ensuring pathways for economic development. • Transitional measures for landowners currently in the process of afforestation who can demonstrate an intent to afforest prior to 4 December 2024. <p>On the other hand, the Government is progressing policy to partner with the private sector to plant trees on Crown land with low environmental and farming value – please refer to the last two rows of this table for more detail. The proposed measures aim to strike an optimal balance between afforestation, maintaining farmer flexibility, and creating more productive value from Crown assets.</p>
	Environment Southland is expected to participate in the formal consultation process when the relevant bill becomes available.
	Staff will keep a watching brief.
Partnering to plant trees on Crown-owned land	<p>Ministry for Primary Industries is requesting information to explore partnership opportunities to afforest (plant native or exotic trees) or promote native forest regeneration on Crown-owned land (excluding National Parks) that has low farming value and low conservation value. A relevant press released can be accessed here. An indicative map showing potential areas for planting has been provided below, with those areas marked in yellow.</p> <p>Objectives include:</p> <ul style="list-style-type: none"> • contributing to climate change targets; • spurring economic growth through a thriving forestry and wood processing sector; and • improving native biodiversity and water quality. <p>Commercial negotiations on a site-by-site basis with interested parties may take place in 2025. Any necessary changes to existing policy will be subject to further advice from officials and decision-making by Cabinet in 2025.</p>

	 <p>This proposal appears to be linked to the current review of the conservation law, including the proposal to review rules around exchange and disposal of crown owned conservation land.</p>
	<p>Potential impact on Environment Southland's operations and the region will depend on how this initiative is managed. A robust legal framework addressing potential biosecurity issues, along with effective collaboration between the central and local governments, will be crucial to minimise negative environmental effects, including biosecurity threats. For example, increased planting of exotic species without the necessary revision of the legal framework could heighten the biosecurity threats Environment Southland is responsible for managing, resulting in increased costs.</p>
Emergency Management Bill	<p>The Government is progressing a comprehensive overhaul of its emergency management system, focusing on strengthening disaster resilience and improving response capabilities, based on the recommendations of the North Island Severe Weather Events Inquiry and other reviews. More details can be accessed here.</p> <p>It is expected that a discussion document seeking public feedback on legislative reform options will be released in the first half of 2025 with the relevant bill being introduced in the second half.</p>
	<p>Given Southland's exposure to multiple natural hazards including flooding, reform of the emergency management system would bring significant benefits if done well. Staff will keep a watching brief and bring updates on the progress of this initiative.</p>

6. Biodiversity & Biosecurity

<i>Amendments to the Biosecurity Act</i>	The Ministry for Primary Industries (MPI) is currently reviewing the Biosecurity Act 1993 to modernise it. It undertook a consultation to collate feedback from the public to inform its advice to the Government on a potential amendment bill. More details are available here . The consultation closed on 13 December 2024. The summary of submissions is available here. The Ministry is planning to provide final policy recommendations to the Minister for Biosecurity later this year.
	Environment Southland's submission was provided to the Ministry within the consultation timeframe (Objective ID: A1208835).
<i>Conservation system reform</i>	<p>On 15 November 2024, the Government released two discussion documents that include proposals to:</p> <ul style="list-style-type: none"> • explore charging for access to some public conservation land • streamline concessions and planning processes and enable more flexibility around land exchange and disposals. <p>It is noted that these proposals support delivery of the Government's priorities for the Conservation portfolio, which include generating new revenue, recalibrating costs for conservation, targeting investment into high-value conservation outcomes, strengthening relationships with Iwi/Hapū, and fixing the concessions process. It appears that this reform is also relevant to the initiative to plant more trees on crown land with low conservational value.</p> <p>The public submission closed on 28 February 2025. A relevant press release can be accessed here.</p>
	Environment Southland's submissions were provided to the Department of Conservation within the consultation timeframe (Objective ID:1236427 and 1236547).

7. Primary Industries

<i>Minerals Strategy for New Zealand to 2040</i>	The Ministry of Business, Innovation and Employment published Minerals Strategy for New Zealand to 2040 on 31 January 2025 . The goal is specified as doubling the value of New Zealand's mineral exports to \$3 Billion by 2035.
	Policy changes on the extraction of minerals could potentially have a substantial impact on Southland's economy, environment as well as Environment Southland's operations. Regional safeguards could play a key role in ensuring that any economic gains from potential expansion of mining in Southland do not come at the disproportional cost in other areas.
<i>Amendment to the Crown Minerals Act 1991</i>	On 26 September, the Government introduced a Bill encompassing a package of changes to the Crown Minerals Act 1991 to address gas security challenges and increase revenue from mining activities. The package includes the reverse of the 2018 ban on new petroleum exploration outside onshore Taranaki, changes

	<p>to how petroleum exploration permits are allocated, streamlining of regulations for recreational gold mining, and other changes to signal to the international market that New Zealand is 'open for business'. It is notable that only one week was allocated for public consultation. More details on the consultation are available here.</p> <p>The Bill has gone through the Select Committee process and passed its second reading on 5 November. However, the Select Committee was unable to reach agreement on whether the bill should be passed. The third reading is yet to occur. The Bill could still be enacted if the majority votes in favour.</p>
	<p>The potential impact of the proposals on Southland and Environment Southland's operations remains unclear, as it will be influenced by multiple factors, including market demands, and the cost of production.</p>

8. Te Tiriti & Te ao Māori legislation

<i>The Principles of the Treaty of Waitangi Bill</i>	<p>The National-ACT's coalition agreement commits to introducing and passing a Treaty Principles Bill through a first reading in 2024. The Bill aims to define the principles of the Treaty, which have primarily been defined by courts.</p> <p>The bill passed its first reading on 14 November and public consultation closed on 14 January 2024. This cabinet paper provides some background information. The consultation page set up by the Justice Committee provides additional details. The Committee is expected report to the Parliament by May 2025.</p> <p>National and New Zealand First have agreed to support the Bill to the select committee stage but have refused so far to commit any support beyond that.</p>
	<p>Environment Southland's submission on the Bill was submitted on 20 December 2024 (Objective ID: A1211872).</p>
<i>References to Te Tiriti in legislation</i>	<p>The National-NZ First coalition agreement promises to review all legislation, aside from Treaty settlements, that include reference to the "principles" of the Treaty of Waitangi. The agreement also includes a pledge to replace all such references with specific words relating to the relevance and application of the Treaty or repeal the references.</p> <p>According to media reports, the Cabinet agreed to the scope and purpose of the review, confirming the specific 28 laws that will have their Treaty provisions changed or removed.</p> <p>It is not yet clear how this policy will be progressed or how it might interact with the Treaty Principles Bill.</p>
	<p>The proposed review of Treaty references in legislation is likely to significantly impact local government operations. Staff will monitor this matter closely</p>

	with a view to facilitate Council feedback once the detail of the relevant Bill becomes available.
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9. Water Services Infrastructure	
<i>Local Water Done Well</i>	<p>On 5 April 2024, the Government made announcements on its replacement three waters policy, Local Water Done Well.</p> <p>The first Bill repealed the legislation intended to introduce the three waters scheme. The second Bill, the Local Government (Water Services Preliminary Arrangements) Bill, was passed into law on 27 August 2024. It provided the framework and transitional arrangements for the new water services system, including a requirement for local authorities to submit a water services delivery plan within 12 months.</p> <p>The third Bill, the Local Government (Water Services) Bill, had its first reading on 17 December 2024, and was referred to the Finance and Expenditure Select Committee. It sets out details relating to the water services delivery system, economic regulation and consumer protection regime and changes to the water quality regulatory framework. It is significant for regional councils as it proposes to introduce a new single standard for wastewater and stormwater environmental performance among other things.</p> <p>The Bill sets out the enduring arrangements for local delivery of water services and includes extensive provisions relating to (among other things):</p> <ul style="list-style-type: none"> • Governance arrangements for the provision of water services, and local authority decision-making requirements • The powers, functions, and responsibilities of water service providers • The establishment of consumer trusts to own/co-own water organisations • Charging for water services • The economic regulation of water services by the Commerce Commission • Access to finance for CCOs established to provide water services • Central government intervention. <p>Submissions closed in February 2025. The Select Committee is expected to report back to the Parliament on or around 17 June 2025 and the Bill is expected to be enacted by mid-2025.</p>
	<p>The Joint Otago and Southland Mayoral Forum agreed in February 2024 to explore options for working together on water services delivery across the two regions. Otago and Southland representatives have been engaged in discussions to explore options for collaboration and shared services approaches as well as the implications of different entity/CCO models. The joint Otago and Southland water services investigation produced a report that was presented to elected officials on 1 November 2024.</p> <p>Environment Southland's submission was lodged with the Committee within the consultation timeframe (Objective ID: 1233315)</p>

<p><i>Wastewater Environmental Performance Standards</i></p>	<p>The Water Services Authority – Taumata Arowai has opened the Consultation on wastewater environmental performance standards. It continues until 24 April 2025.</p> <p>It noted that the goal of wastewater standards is to put in place a clear regulatory framework to respond to this infrastructure challenge and to set clear expectations about the treatment of wastewater in a way that helps territorial authorities as they plan for and fund the necessary infrastructure upgrades, together with regional councils as part of the consenting process.</p> <p>The proposed standards are expected to:</p> <ul style="list-style-type: none"> • result in significant cost and time efficiencies for consenting of wastewater treatment plants, in a way that responds to the bow wave of re-consenting of wastewater infrastructure over the next decade • strike a balance between the cost of upgrading wastewater infrastructure while ensuring that public health and environmental outcomes are achieved • create national consistency to give councils the certainty needed to plan and fund the significant infrastructure upgrades that much of New Zealand's aging public wastewater networks require • set clear expectations about treatment quality to assist with community engagement about different options to manage wastewater • ensure that, as a sector, we have good quality wastewater performance data to identify what's working well as well as opportunities for improvement.
	<p>The proposed standards are expected to have a significant impact on Environment Southland's operations as well as Southland's natural environment and communities. While achieving national consistency through standardisation is desirable, the lower thresholds set by the standards, combined with the inability to impose stricter consent conditions, could pose a risk to water quality, and create disparities between different user groups.</p> <p>A submission is currently being developed with cross organisational input.</p>

<h2>10. Transport</h2>	
<p><i>Transport Government Policy Statement (GPS)</i></p>	<p>The Government Policy Statement (GPS) on land transport guides the NZ Transport Agency (NZTA), KiwiRail and local authorities on land transport investment. A final GPS was released in June 2024.</p> <p>It prioritises roads – including an overhauled Roads of National Significance programme – and reduced funding in real terms for public and active transport. The previous government had budgeted up to \$3.2b on public transport infrastructure and \$2.8b for public transport services over the next three years. The current Government has reduced this to \$2.1bn and \$2.3bn respectively.</p> <p>The GPS expects that local government will seek additional revenue from public transport fares and other third-party revenue.</p>

	<p>The South Island Regional Transport Committee Chairs Group and the Otago and Southland Regional Transport Committees submitted on the draft GPS with input from Environment Southland staff. Staff have undertaken the necessary modifications to align the Regional Land Transport Plan with the final GPS.</p>
2024-2027 National Land Transport Programme	<p>NZ Transport Agency Waka Kotahi (NZTA) released the 2024–27 National Land Transport Programme (NLTP), to meet the Government’s strategic priorities set out in the Government Policy Statement on Land Transport (GPS) 2024.</p> <p>The National Land Transport Programme is a three-year programme of prioritised activities with a 10-year forecast of revenue and expenditure. It is prepared by NZTA to give effect to the GPS and reflects a partnership between NZTA (which invests National Land Transport Fund funding on behalf of the Crown), and local government (which invests on behalf of ratepayers).</p> <p>Regional summaries are available of the NLTP forecast investment. For Otago/Southland,</p> <ul style="list-style-type: none"> • A total of \$1.4 billion is forecast to be invested in Otago/Southland in the 2024-27 National Land Transport Programme (NLTP) period. • Investment in Otago/Southland during the 2024-27 NLTP to create a more resilient and efficient land transport system that supports economic growth and prosperity. • The \$1.4 billion forecast investment includes: <ul style="list-style-type: none"> ○ \$313m forecast maintenance operations investment ○ \$562m forecast to fix potholes investment ○ \$333m forecast improvements investment ○ \$125m forecast public transport investment ○ \$2.4m forecast safety investment ○ \$28.5m forecast walking and cycling investment <p>Otago/Southland regional summary – NLTP 2024-27 [PDF, 142 KB]</p>

11. Other Infrastructure	
National Infrastructure Plan	<p>New Zealand Infrastructure Commission is currently leading the development of the 30-year National Infrastructure Plan that will set out infrastructure priorities for New Zealand. It will outline infrastructure needs over the next 30 years, planned investments over the next 10-15 years, and recommendations on priority projects and reforms.</p> <p>The Commission received public feedback in the second half of 2024. It is expected that the findings will be shared in the second half of 2025 with the final Plan being presented to the Government in December 2025.</p> <p>Further details on the National Infrastructure Plan are available in the media release from the Beehive from August 2024.</p> <p>While the Plan is being developed, the Infrastructure Commission launched IPP website providing the public with opportunities to submit a proposal for</p>

	infrastructure priorities. Proposals and project assessed as meeting the IPP criteria will be included within the National Infrastructure Plan.
	<p>The national plan is expected to have a significant impact on Environment Southland's operations and the broader Southland region, as it is likely to influence the scale and nature of future infrastructure development in the area.</p> <p>Staff will closely monitor relevant developments and engage with relevant agencies to identify risks and opportunities.</p>
<i>National Infrastructure Funding and Financing Limited</i>	<p>National Infrastructure Funding and Financing Limited (NIFFCo) was established on 1 December 2024 by repurposing Crown Infrastructure Partners, an existing infrastructure entity with a focus on administering infrastructure funds.</p> <p>Refer to the relevant announcement made in August 2024. The NIFFCo will serve as the Crown's primary interface for receiving unsolicited proposals and facilitating private sector investments in infrastructure. It will partner with various agencies and local governments on projects involving private finance and will administer Central Government infrastructure funds.</p>
	Staff will closely monitor relevant developments and engage with relevant agencies to identify risks and opportunities.
<i>City/regional deals</i>	<p>On 22 August, the Government released a strategic framework to establish Regional Deals between central and local government to drive economic growth and deliver the infrastructure. All regions are invited to propose a Regional Deal. These proposals will be considered by the Government before finalising New Zealand's first Regional Deal by December 2025.</p> <p>The Infrastructure and Investment Ministerial Group will be supported by the Department of Internal Affairs with support from relevant agencies as required. The National Infrastructure Agency is expected to play a key role in developing deals on behalf of Government.</p>
	The implications of this initiative for Southland are currently unclear. Staff will closely monitor relevant developments and engage with relevant agencies to identify risks and opportunities.
<i>Regional Infrastructure Fund</i>	<p>The RIF delivers on the Government's promise to address the regional infrastructure deficit. It will help boost the New Zealand economy, increase regional prosperity, and create jobs.</p> <p>The RIF, \$1.2 billion over three years, is administered by Kānoa – Regional, Economic Development & Investment Unit (Kānoa – RD).</p> <p>The RIF is a capital fund. Funding support is primarily provided through a mix of loan and equity investments.</p> <p>The RIF will invest specifically in regional infrastructure, making investments in projects that boost regional growth, resilience, and productivity. This includes building new infrastructure and improving existing structures to benefit regional businesses, organisations, and communities.</p>

	More information is available on here .
	For Southland, the RIF co-investment scheme currently covers Aparima Catchment Flood Protection Scheme Upgrade, Ōreti River Catchment Flood Protection Upgrade Project, and Te Anau Basin Catchment Flood Management Project. Additionally, it was announced on 14 November that the Government is investing a \$2.2 million RIF funding loan towards the development of an aquaculture centre of excellence in Southland at the Ocean Beach site near Bluff. Environment Southland staff will consider any other opportunities associated with the RIF.

12. Other Topics	
<i>Local Government System Improvements</i>	<p>On 7 February, the Department of Internal Affairs proactively released a Cabinet paper on Local Government System Improvements, outlining the Government's next steps for progressing its 'back to basics' improvements for the local government system announced in December.</p> <p>The Government intends to introduce a bill to make changes to the Local Government Act 2002 and other related legislation in mid-2025 and enact in late 2025, soon after the local government elections.</p> <p>The Bill will make changes to:</p> <ul style="list-style-type: none"> • refocus the purpose of local government and reinstate a list of core services in the Local Government Act 2002 • improve council performance measurement and reporting standards so that ratepayers can more easily access consistent, comparable information • improve systems for managing conflict between elected members, by enabling a standardised code of conduct to be issued • provide regulatory relief to councils and modernise outdated law. <p>Cabinet decisions on the second tranche of proposed changes to “limit council expenditure, possibly by implementing a similar system to the New South Wales 'rate peg'” and “reduce council costs by simplifying the planning and reporting framework”, will also be made early this year.</p>
	While the proposed initiative is expected to significantly impact Environment Southland's operations, the extent of that impact will depend on the details of the proposals. Staff will keep a close watching brief.
<i>Regulatory Standards bill</i>	<p>The Ministry for Regulation ran a public consultation on the key aspects of the Regulatory Standards Bill until mid-January 2025.</p> <p>It is noted that ‘the Regulatory Standards Bill aims to improve the quality of regulation in New Zealand so regulatory decisions are based on principles of good law-making and economic efficiency.</p> <p>A summary of submissions is expected to be available later in 2025, once it has been provided to the Minister for Regulation for consideration. The feedback received will inform the development of a Bill the Government intends to</p>

	introduce to Parliament later this year. The timing of the Bill's introduction will be dependent on final policy decisions and the Parliamentary legislation programme.
	Environment Southland participated in the consultation (Objective ID: A1207544). It is expected that it will participate in the future select committee process once the draft Bill becomes available later this year.
<i>Electoral Reform Issues Paper</i>	<p>The National Council of LGNZ set up the Electoral Reform Working Group to lead efforts to strengthen local government's democratic mandate, with a focus on increasing participation in local elections. The working group produced an Issues Paper in October last year. More details can be accessed here.</p> <p>The working group's issues paper focusses on five key topics:</p> <ul style="list-style-type: none"> • How well the public understands local government and why it matters • Understanding the candidates and their policies • Voting methods • How elections are run and promoted • The possibility of moving to four-year terms (including how this would work) <p>On 13 March 2025, the Group released the draft position paper for public feedback. The consultation closes on 28 April 2025. The final version is expected to be launched at the SuperLocal Conference in July 2025.</p>
	Staff are closely monitoring this workstream, given the direct relevance to the operations of local governments.
<i>Public Works Amendment Bill</i>	<p>On 25 February 2025, Land Information Minister Chris Penk announced the reform of the Public Works Act, aiming to expedite infrastructure development in New Zealand.</p> <p>Key changes include delegating land acquisition to government agencies, enabling collaboration between agencies, simplifying the relocation of infrastructure, and clarifying the role of the Environment Court. Additionally, mediation will be required for compensation disputes, and Transpower will be allowed to acquire land more easily for energy infrastructure. The reforms aim to support the government's economic growth agenda by reducing barriers to building essential infrastructure, with further improvements to be revealed in 2025.</p> <p>Further announcement was made on 10 March 2025.</p> <p>"In the coming months, we'll be amending the PWA to accelerate the acquisition of land needed for the public projects that are listed in Schedule 2 of the Fast-track Approvals Act, and the Roads of National Significance listed in the Government Policy Statement on land transport 2024. It is intended that amendments will come into force six months before wider PWA review amendments.</p> <p>The amended legislation will feature:</p> <ul style="list-style-type: none"> • landowners who voluntarily sell their land before a Notice of Intention is issued will receive an additional premium payment equal to 15 percent of their land's value, capped at \$150,000.

	<ul style="list-style-type: none"> • All landowners whose land is acquired under the accelerated process will receive a five percent recognition payment, capped at \$92,000. • Landowners who object to land acquisition for critical infrastructure projects will no longer go through the Environment Court. They will instead submit their objections directly to the relevant decision-maker, either the Minister for Land Information or the local authority, for faster resolution. <p>A draft Bill is expected to be introduced in May. Wider PWA review amendments are likely to be introduced as well towards the end of 2025.</p>
	<p>The proposals are likely to have both direct and indirect impacts on Environment Southland. ES may participate in the public consultation expected to commence in May.</p>
<i>Term of Parliament (Enabling 4-year Term) Legislation Amendment Bill</i>	<p>It was announced that legislation enabling a four-year parliamentary term, subject to a referendum, passed its first reading in Parliament on 5 March 2025. The Bill, modelled on the ACT Party's draft Constitution (Enabling a 4-Year Term) Amendment, proposes a standard three-year term but allows for an extension to four years subject to certain criteria being met. The change would be contingent on the outcome of a binding referendum, which could be held alongside the 2026 General Election. The Government intends to gather public feedback through the select committee process before making further decisions. The three Government parties have committed only to support the Bill to Select Committee at this point.</p> <p>A Referendums Framework Bill, outlining the process for conducting a referendum, will also be introduced to the Parliament soon.</p> <p>The consultation on this Bill runs until 17 April 2025.</p>
	<p>While the four-year term for Parliament doesn't directly affect regional councils, it could indirectly influence how they interact with central government, align with national policy cycles, or plan their activities to coordinate with national election timelines. Environment Southland is likely to engage with the Select Committee process by lodging a submission.</p>
<i>Overseas Investment Reform Bill</i>	<p>It was announced during the Investment Summit on 13 March 2025 that the Government is undertaking a full review of our Overseas Investment Act to make New Zealand's investment regime more investor-friendly while ensuring New Zealand's long-term interests are protected. The new regime will operate with a presumption in favour of foreign investment, acknowledging the significant benefits it can bring to our economy.</p> <p>It is expected that the relevant Bill will be introduced in May and be passed into law by the end of the year.</p>
	<p>Given the potentially significant impact the increase in foreign investment can have on the Southland region, staff will keep a watching brief on this topic.</p>

9.5 Climate change and community resilience portfolio update

Report by: Anke Habgood, Senior Strategy Advisor

Approved by: Rachael Millar, General Manager Strategy, Policy & Science

Report Date: 2 April 2025

Purpose

The purpose of this item is to provide an update of progress being made on the development of the regional Framework for Action.

Summary

A brief update is provided on the work of the Regional Climate Change Working Group as part of the climate change and community resilience portfolio.

Recommendation

It is recommended that the Strategy and Policy Committee resolve to:

- 1 Receive the report - Climate change and community resilience portfolio update.

Background

Following a regional climate change hui in July 2022, Environment Southland and Te Ao Mārama have brought together a staff-level regional climate change working group, which has met regularly since October 2022.

In addition, a governance-level regional climate change working group (RCCWG) has also been established, which held regular meetings and workshops throughout 2023 to develop a proposed Regional Climate Change Strategy (RCCS) – phase 1 of the RCCWG workplan. The governance-level group is not a formal joint committee and does not have formal delegations.

Phase one of the RCCWG work concluded with the adoption of the Regional Climate Change Strategy by the ES Strategy & Policy Committee, 16 October 2024. This strategy has also been adopted by Gore District Council, Invercargill City Council, Southland District Council and endorsed by Te Ao Mārama.

Throughout 2024 the RCCWG have also been progressing phase two of this work. Phase two is to develop a regional Framework for Action, setting out how the aspirations in the strategy could be achieved.

Regional Framework for Action process

The focus of the RCCWG workshop – 6 March 2025 was to continue to refine the draft regional Framework for Action. The RCCWG inter-agency report from the March workshop is attached as appendix 1.

There has been significant progress recently related to communications and engagement on the draft regional Framework for Action. This has included a range of one:one conversations, attendance at events, as well as attendance at some community board meetings. The three key questions that have helped frame up engagement are:

- **What changes in the climate have you noticed in your area?** Flooding? Windier days? Share your observations
- **Are you doing anything differently because of our changing climate?** Using your drier more? Planting crops at new times? Let us know

- **What actions are needed to support our region's response to our changing climate?** What are you already doing? What else could we be doing? Let us know

Planning is also underway for a stakeholder hui 3 April 2025, to be held at the Invercargill Workingmen's Club. A copy of the invitation for the Climate Collaboration Stakeholder Hui is attached as appendix 2.

A draft report identifying what the key themes that have been heard from these engagements is intended to be provided to the next RCCWG workshop 10 April 2025 for consideration by the RCCWG as to how this could inform further refinement of the draft regional Framework for Action. Once this report is finalised it will also be provided to each agency as part of their consideration of the draft regional Framework for Action.

Next steps

In summary, the next steps are:

1. supporting ongoing RCCWG workshops to continue progressing phase2: the regional Framework for Action – the next RCCWG workshop is scheduled for 10 April 2025.
2. consideration of community and stakeholder input into phase 2: the regional Framework for Action;
3. continual refining of the draft regional Framework for Action, with the intent of putting this forward for each agency to consider by mid-2025.

Fit with strategic framework

OUTCOME	CONTRIBUTES	DETRACTS	NOT APPLICABLE
Managed access to quality natural resources	X		
Diverse opportunities to make a living	X		
Communities empowered and resilient	X		
Communities expressing their diversity	X		

Attachments

1. Governance level RCCWG inter-agency joint report - workshop 6 March 2025 [9.5.1 - 4 pages]
2. RCCWG - Climate Collaboration Stakeholder Hui Invitation - 3 April 2025 [9.5.2 - 1 page]



Regional Climate Change Working Group report

To: Environment Southland
Te Ao Mārama Board
Gore District Council
Invercargill City Council
Southland District Council

Meeting Date: Wednesday 2 April 2025

From: Staff-level Regional Climate Change Working group

Purpose

This report provides all Councils and the Te Ao Mārama Board with an update on the governance-level Regional Climate Change Working Group workshop, held 6 March 2025.

Recommendation

That councils and the Te Ao Mārama Board receive the report "Regional Climate Change Working Group report".

Background

Following a Regional Climate Change Hui in July 2022, Environment Southland and Te Ao Mārama brought together a staff-level regional climate change working group, which has met regularly since October 2022. A governance-level regional climate change working group (RCCWG) was established in February 2023.

The RCCWG met throughout 2023 to progress phase one of its work, to develop a Regional Climate Change Strategy. Phase one concluded with the adoption of the Regional Climate Change Strategy by all Councils and the endorsement by the Te Ao Mārama Board between August and October 2024.

Phase two of this work, to develop a regional Framework for Action, was commenced by the RCCWG at the start of 2024.

The governance-level RCCWG is not a formal joint committee and does not have formal delegations. It is supported by the staff-level working group.

Phase 2 workshops and meetings

The Regional Climate Change Strategy states that as part of phase two, the Regional Framework for Action will define and prioritise the specific actions and initiatives needed to realise the outcomes being aspired to; as well as:



- Enable each individual local agency to create Action Plans that align with the aspirations set out in this strategy
- Evaluate the merits of and define the continuing or new collaborative actions to which local government agencies will commit
- Identify opportunities for collaboration beyond local government – empowering the aspirations, energies, and creativity of communities and industry.

The RCCWG held six workshops throughout 2024, focusing on the development of pathways to achieve the aspirations in the Regional Climate Change Strategy, in order to create a Regional Framework for Action.

At the conclusion of the September workshop, the governance RCCWG tasked the staff working group with developing a prototype Regional Framework for Action document based on the direction received to date. This prototype is still in the process of being refined by the governance RCCWG.

The draft prototype

A summary of the proposed key components has recently been provided to each partner agency to formally request feedback on these components.

The draft prototype document continues to be refined as various feedback is sought and received from each agency.

RCCWG workshop – 6 March

The focus of the RCCWG workshop – 6 March 2025 was to continue to refine the draft regional Framework for Action.

The workshop started with some reflection time on the RCCWG Terms of Reference, in particular what the group considered to be working and what isn't working. The intention is that at a future workshop it will be refined so that if required, a letter of recommendations could be drafted for the incoming RCCWG post-LG elections.

Given the importance of each agency being aware of how planned science work to facilitate adaptation and reduce impact is progressing, a science update from Environment Southland was presented next.

An update on the progress of communications and engagement activities in relation to the regional Framework for Action was also provided. There are three key questions that have helped frame post engagement, which are:

What changes in the climate have you noticed in your area? Flooding?
Windier days? Share your observations

Are you doing anything differently because of our changing climate? Using
your drier more? Planting crops at new times? Let us know



What actions are needed to support our region's response to our changing climate? What are you already doing? What else could we be doing? Let us know

These questions have been useful conversation starters for one:one engagement, as well as for attendance at the Winton, Gore, Waiau and Southland A&P shows and SIT orientation week. It was noted that further planned engagements include a pop-up booth at Invercargill Central 21 March, the Multicultural Festival 22 March and the Riverton Heritage Festival 29 March.

A draft report identifying what the key themes that have been heard from these engagements is intended to be provided to the next RCCWG workshop 10 April 2025 for consideration.

Climate Collaboration Stakeholder Hui

The RCCWG worked through and refined the concept of a Climate Collaboration Stakeholder Hui that is planned for 3 April 2025. This was to ensure invitations would be ready to send out as soon as possible after the workshop.

It was agreed that the purpose of this hui would be to expand stakeholder participation in regional climate action planning by fostering shared understanding, gathering insights on priorities and opportunities, and ensuring alignment of local government obligations with business and stakeholder needs and aspirations.

Refining the draft Regional Framework for Action

Some work had been undertaken prior to the workshop to develop initial drafts of the foreword as well as the working together section of the draft regional Framework for Action. The RCCWG spent some time working through the key messaging of each agency and discussing how these could be refined.

There was also significant discussion about the actions to be included in the draft regional Framework for Action and how these could be progressed.

Next steps

The staff working group will further refine the Regional Framework for Action prototype as a draft document based on the direction received to date.

In addition, the upcoming milestones are:

- Presentation of key regional Framework for Action components to GDC Council meeting – 18 March 2025
- Meeting with various ICC and SDC community boards throughout March and early April
- Climate Collaboration Stakeholder Hui – 3 April 2025
- Presentation of key regional Framework for Action components to ICC Council meeting – 8 April 2025
- Next RCCWG workshop – 10 April 2025



Key Messages

Relevance

- The need for continued climate change learning and action is important to the future resilience of Southland communities. We don't want to produce a Strategy and a Framework for Action that look nice, but then gets filed and forgotten.
- A key focus for the RCCWG has been understanding how we influence regional climate change outcomes collectively through individual councils competing priorities and resource constraints.
- We seek to empower each council to deliver the best impact efficiently, either individually or alongside like-minded partners and stakeholders.

Collaboration

- Collaborative action is most likely to deliver climate resilience benefits for the communities of Southland.
- The collaboration over the last two years has been inspiring and rewarding and there is increasing confidence in the ability to sustain collaboration on this work.

Local Government Election Cycle

- Our current RCCWG members recognise that progressing the Framework for Action is a key task as the end of the current local government triennium approaches.
- We recognise it is important to understand how to maintain momentum on regional climate learning and action beyond the end of the current term.
- We have been reflecting on what the Key Performance Indicators (KPI) might be appropriate to guide regional climate collaboration into the next term.

Climate Action Planning

- We have found that sometimes it is necessary to probe into topics that some consider uncomfortable and difficult, but that it remains important to do so with respect and sensitivity.
- We understand that some climate-related actions may deliver immediate and direct benefit, while others may be enabling actions that generate value in a more indirect fashion.
- We are excited at the prospect of hosting the regional Climate Collaboration Hui on 3 April 2025.



Climate Collaboration Hui

**Thursday
3 April**

9am-3pm

Invercargill Workingmen's Club

We'd love to see you for:

- Keynote addresses by Simon Upton, the Parliamentary Commissioner for the Environment, Professor James Renwick, former Climate Commissioner and current director of the Master's in Climate Change Science and Policy programme at Victoria University, and Mike Casey from Rewiring Aotearoa
- An update on the regional response to our changing climate and an opportunity to discuss your climate actions and network with other stakeholders.

RSVP by Thursday 27 March to communications@es.govt.nz



Environment Southland (Southland Regional Council)



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9.6 Group Update

Report by: Liz Devery, Regional Planning Manager

Approved by: Rachael Millar, General Manager Strategy, Policy & Science

Report Date: 2 April 2025

Purpose

This report is an update on the work being carried out by the Strategy, Science and Policy Group.

Recommendation

It is recommended that the Strategy and Policy Committee resolve to:

- 1 Receive the report - Group Update.

Background

The Strategy, Policy and Science Group are responsible for:

- Developing clear strategy, corporate plans and defined priorities
- Proving coordination and support for the management and successful performance of the organisation's key groups of activities/portfolios – air quality, biosecurity and biodiversity, climate change and community resilience, coast and marine, regional leadership, and water and land
- Leading the generation and reporting of data and insights
- Delivering science capability
- Developing resource management and regional plan-making
- Providing policy advice
- Providing drafting leadership
- Monitoring plan effectiveness
- Managing the review of, and Council's response to, national direction and reform

Matters of Interest

Information about national and regional matters of interest is outlined below.

National

On Thursday 13 March, Environment Southland presented to two Select Committees on the Resource Management Bill 2 (on Section 70) and on the Offshore Renewable Energy Bill. The committees were interested in our submissions and had good questions relating to the content.

Staff are in the process of preparing a submission on the proposed Taumata Arowai Wastewater Standards which are due on 24 April which is the next consultation document out for consideration.

Regional

Invercargill City Council

Recently we have submitted on and attended the Committee hearings for the Draft Donovan Park Masterplan. The submission was well received, and the Committee was keen to accept any Environment Southland support to establish wetlands within Donovan Park.

Gore District Council

Staff presented evidence and attended the Natural Hazards chapter hearing of the Proposed Gore District Plan on 10 and 11 March. The evidence provided the hearings panel with a copy of the recent Mataura River flood model and subsequent flood depth and flood velocity information for 5% and 1% Annual Exceedance Probability (AEP) events for the Gore and Mataura townships. The evidence also outlined how the model and Regional Policy Statement requirements should be incorporated Proposed Gore District Plan.

A Minute has been produced from the panel requesting additional information to support the Proposed District Plan which has requested that staff provide additional information and attend the final hearing on 7 April.

Coastal Environment

The review of the Regional Coastal Plan is continuing with positive progress being made in drafting and considerations of options for approaches. Staff are aware of the potential need to respond to potential changes in national direction and the impending RMA reform, but are currently progressing to have a draft plan ready to consult on in the middle of the year.

The recent public consultation with the community related to the Regional Coastal Plan review has now been completed. This was undertaken as community engagement, asking the Southland community to have their say on a range of values related to the management of the coastal marine area. The fifteen values fell within the categories of recreational, social, environmental, cultural and economic, and participants were asked to rank each value from 1 (the most important) to 5 (the least important). Participants were also asked to nominate a coastal spot in Southland that was important to them and why, and also what they thought were the greatest threats to Southlands coastal environments. An option was also provided for respondents to place a pin in a large Southland map to show their favourite parts of the coast.

One of the outcomes sought from this exercise was to raise awareness of the role that Environment Southland has in relation to the coastal environment and to get people engaged in conversations. The responses are an indication from the community of Southland of what areas and values are important to be managed and protected in the proposed Regional Coastal Plan. The results from this community engagement will be used to sense-check the direction for the updated Regional Coastal plan currently being drafted, alongside other engagement and consultation information, such as the cultural values work undertaken by Te Ao Marama Inc.

Over a seven-week period, staff attended seven events (Winton, Gore, Waiau & Southland A&P shows, Crank Up, SIT Open Day and the Surf to City) and obtained 352 responses through face-to-face engagement. During this time, 890 people visited the Have Your Say page on the Environment Southland website. 305 participants were informed by obtaining information from multiple website sources and 126 engaged in the survey or pinned a location on the online map or both.

Initial collation of the results has indicated some definite trends. A brief summary of the responses is set out below.

In terms of respondents, more females than males completed survey responses both online and face to face. All age groups were well represented in the surveys completed. While the majority of respondents came from Invercargill, all parts of the region were represented by the participants completing survey forms.

The coastal location of importance to the greatest number of respondents was Riverton, closely followed by Ōreti beach, Curio Bay, the Catlins and Gemstone Beach. Beaches in general or “all of the coast” also scored very highly in the number of responses. The greatest threat recognized by the largest number of respondents was pollution from many sources affecting both coastal and freshwater environments. Other recognized threats included erosion and sea level rise, human impacts and overfishing.

Of the fifteen values participants were asked to rate, the ones that received the most overall responses were:

Access to recreational places for activities	322
Presence of marine birds, mammals and other marine species	304
Clean, fresh air	299
Water quality is high and safe for activities like recreation and food gathering	286
Fishing and mahinga kai	267

The values that received the least number of overall responses were:

Opportunities for economic development	218
Tikanga and customary practices can be exercised	222
Sacred places and sites (wāhi tapu) are recognized and protected	222
Access to launch and landing sites for waka, recreational boats	227
Opportunities for learning and education	242
Enhanced community wellbeing & connectedness	244

Within those responses, the values that rated most highly with respondents (most #1s) were:

Access to recreational places for activities	301
Water quality is high and safe for activities like recreation and food gathering	279
Presence of marine birds, mammals and other marine species	272
Clean, fresh air	266
Fish and seafood can be harvested for food production	202

Fit with strategic framework

OUTCOME	CONTRIBUTES	DETRACTS	NOT APPLICABLE
Managed access to quality natural resources	X		
Diverse opportunities to make a living	X		
Communities empowered and resilient	X		
Communities expressing their diversity	X		

Attachments

1. Current and upcoming consultation documents - 2 April 2025 [9.6.1 - 2 pages]

Current and upcoming consultation documents

Name of Initiative	Agency engaging	Due Date	Description	Action
Term of Parliament (Enabling a 4-year Term) Legislation Amendment Bill Term of Parliament (Enabling 4-year Term) Legislation Amendment Bill	Justice Select Committee	17 April	Bill empowers a 4 year Parliamentary term subject to certain criteria being met. Bill only takes effect if New Zealanders vote for a 4 year term in a referendum. This is a Government Bill awaiting a first reading – the three Government parties have committed only to support the Bill to Select Committee at this point.	Maintain watching brief
Help Shape New Zealand's Wastewater Future https://www.taumataarowai.govt.nz/ews/articles/consultation-provides-an-opportunity-to-contribute-to-new-zealands-wastewater-future/	Taumata Arowai	24 April	Proposes a set of four national wastewater environmental performance standards	Submit
Land Transport Management (Time of Use Charging) Amendment Bill https://bills.parliament.nz/v/6/0580baa4-9e7b-4bf6-6cf8-08dd1e07a2b1	Transport and Infrastructure Committee	27 April	This bill establishes a framework for implementing time of use charging schemes in New Zealand. It enables local authorities to identify areas of problematic congestion, propose indicative scheme areas, and outline potential charging zones for approval by the Minister of Transport.	Maintain watching brief

Draft Electoral Reform Position Paper https://www.lgnz.co.nz/documents/760/LGNZ_ERWG_draft_position_paper.pdf	LGNZ	28 April	LGNZ's draft proposals for electoral reform.	Maintain watching brief
Proposed Southland Regional Public Transport Plan Link	Invercargill City Council	13 April	The Southland Regional Public Transport Plan (RTP) lays out the future direction of public transport in Invercargill and the wider Southland Region for the next 10 years (2024-2034)	Submit

9.7 Update on Councillor Requests and Actions

Report by: Mikayla Wass, Personal Assistant

Approved by: Rachael Millar, General Manager Strategy, Science & Engagement

Report Date: 2 April 2025

Purpose

This report captures Councillor requests and actions that have occurred during Strategy and Policy Committee meetings and provides an update on how these are being responded to.

Recommendation

It is recommended that the Strategy and Policy Committee resolve to:

- 1 Receive the report and approve the letter to the Minister of Resources regarding timeframes - Update on Councillor Requests and Actions.

Report

The following tables summarise requests from Councillors that have occurred in recent months:

Date	Councillor Request/Action	Update
June 2024	Action: Staff to bring a more detailed report to a subsequent meeting on options for managing commercial forestry in Southland. Information to include regulation within the RPMP and any alternative changes/regulation that could be covered in W&LP, costs and timeframes.	A workshop will be held in 2025 about response options including and update on recent Government announcements in this space.
July 2024	Request: Clarification needed around Marine Farm waste and feed practices.	This will form part of the aquaculture conversations occurring in 2025.
September 2024	Action: Staff to provide further information on New River Estuary.	To form part of the workshop series for 2025.
September 2024	Request: Reporting on city contaminants impacts to waterways.	As above.
December 2024	Action: Cr Ludlow to investigate options with staff for a climate change portal, where Councillors could share 'up to date' information with each other.	A verbal update will be provided at the April meeting.

Attachments

Nil

10 Extraordinary/urgent business | Panui autia hei totoia pakihi

11 Public excluded business | He hui pakihi e hara mo te iwi

At the time of the agenda closing, there were no public excluded items for this meeting.