

26 May 2022

File Ref: OIAP-7-24163

By email: [REDACTED]

Tēnā koe [REDACTED]

### **Request for information 2022-057**

I refer to your request for information dated 19 April, which was received by Greater Wellington Regional Council (Greater Wellington) on 19 April. You have requested the following:

*“Forest & Bird is currently developing a league table comparing the efforts of every single council in the country and their track record of addressing the twin crises of climate change and biodiversity loss.*

*We therefore request the following information under the Local Government Official Information and Meetings Act:*

- 1. Does your council have a climate change strategy?*
- 2. Does your council have an implementation plan for your climate strategy?*
- 3. How do you measure outcomes relating to the achievement (or not) of the objectives of your climate change strategy?*
- 4. Does your council have a biodiversity strategy?*
- 5. Does your council have an implementation plan for your biodiversity strategy?*
- 6. How do you measure outcomes relating to the achievement (or not) of the objectives of your biodiversity strategy?*
- 7. Has your council mapped its Significant Natural Areas (SNAs)? Are these maps in your operative District Plan?*
- 8. How many SNAs have you identified in your district/region? Could you please quantify the total area these SNAs represent?*
- 9. How does your council maintain SNAs?*
- 10. How many consents have you issued in the last five years to allow for vegetation clearance in SNAs? How many have been declined?*
- 11. Do you have vegetation clearance rules that enable identification of additional SNAs through the consenting process?*
- 12. How often does your council monitor SNAs?”*

**Greater Wellington’s response follows:**

On 4 May 2022 you agreed to clarify your request to identify that 'significant natural areas' that you referred to as areas that Greater Wellington has identified that contain indigenous ecosystems and habitats with significant indigenous biodiversity values. As you clarified your request within the statutory seven working day timeframe provided for under the Local Government Official Information and Meetings Act 1987, Greater Wellington restarted the 20-working day timeframe to respond.

Please find responses to each element of your request below:

*1. Does your council have a climate change strategy?*

Yes, Greater Wellington has a climate change strategy. Responding to the climate emergency is also one of four overarching strategic priorities in our integrated strategy, as detailed in the Long Term Plan 2021-31:

<https://ltp.gw.govt.nz/>

*2. Does your council have an implementation plan for your climate strategy?*

Council declared a climate emergency in August 2019. This decision responds to the urgency climate change presents and encourages a step change in how Greater Wellington addresses climate change, both corporately and in how it uses its influence in the Wellington Region. Council adopted two ten-point action plans - a Corporate Carbon Neutrality Action Plan and a Regional Climate Emergency Action Plan. These are collectively referred to as the Greater Wellington Climate Emergency Response Programme. Further information can be found at the below link:

<https://www.gw.govt.nz/environment/climate-change/>.

*3. How do you measure outcomes relating to the achievement (or not) of the objectives of your climate change strategy?*

Each quarter, performance against the two ten-point action plans is reported to the Climate Committee of Council in a Climate Emergency Response Programme update and status report. Information in these reports is drawn from across Greater Wellington. Committee papers are publicly available on Greater Wellington's website:

<https://www.gw.govt.nz/your-region/events-and-meetings/?date-range=past-dates&from-date=&to-date=25%2F05%2F2022&start=0&topics%5B%5D=committee-meetings%2Ccouncil-meeting&regions%5B%5D=>

4. *Does your council have a biodiversity strategy?*

Yes – the Greater Wellington Regional Council Biodiversity Strategy. It can be accessed at the below link:

<https://www.gw.govt.nz/assets/council-publications/Biodiversity-Strategy-2016.pdf>

The non-statutory strategy guides how Greater Wellington protects, maintains and restores biodiversity through its policy, planning and operations. It is not intended to direct the work of any other agency, organisation or group within the Wellington region.

5. *Does your council have an implementation plan for your biodiversity strategy?*

The strategy contains guidance for how the various departments of the council can contribute towards achieving the goals of the strategy. Detailed decisions about implementation are determined within departments.

6. *How do you measure outcomes relating to the achievement (or not) of the objectives of your biodiversity strategy?*

Greater Wellington is establishing a monitoring system to understand how different council departments' activities are contributing to achieving the strategy's goals and objectives. Once this is set up the results will be captured in the Council's annual business reporting. We will be reporting on this for the first time at the end of this financial year as part of Council's annual business reporting.

Greater Wellington conducts a wide range of environment monitoring and reporting on biodiversity and other environmental measures. This can all be found at the following link:

<https://www.gw.govt.nz/document/19544/environmental-monitoring-annual-report-2017>

However, although highly relevant, this data is not formally tied to the objectives of the Biodiversity Strategy.

7. *Has your council mapped its Significant Natural Areas (SNAs)? Are these maps in your operative District Plan?*

In the Wellington region, the [Regional Policy Statement](#) (prepared by the Regional Council) directs how regional, district and city plans must identify and protect ecosystems and habitats with significant indigenous biodiversity values. Greater Wellington is responsible for identifying and protecting these areas within wetlands, the beds of lakes and rivers, and in the Coastal Marine Area

(see [here](#) for detailed regional guidance) across the entire region. These areas are scheduled and protected through provisions in the [proposed Natural Resources Plan for the Wellington Region](#) (PNRP). The areas we have interpreted to be considered 'significant natural areas' are:

- Schedule A – Outstanding waterbodies
- Schedule F – Ecosystems and habitats with significant indigenous biodiversity values

Maps with this information can be accessed at [GWRC Web Map Viewer](#). The layers to activate include:

- Natural Resources Plan (2019)
  - Schedule A
  - Schedule F

The Wellington Region's territorial authorities (city and district councils) are responsible for identifying ecosystems and habitats with significant values for all land under their jurisdiction (excluding the coastal marine area and the beds of lakes and rivers). These are to be identified in each territorial authority's city or district plan.

*8. How many SNAs have you identified in your district/region? Could you please quantify the total area these SNAs represent?*

Our regional sites under Schedules A and F in the PNRP (which we have defined as 'significant natural areas' for the purposes of this request) are mapped both by area (beds of lakes and some rivers, wetlands, coastal sites) and also line distance (majority of rivers/streams).

The total number of area-based sites is **362**. The total number of river segments (measured by distance) is **22837**.

The total area of area-based sites is 620km<sup>2</sup>. The combined length of river segments 7169 km.

The data extracted from Greater Wellington's GIS database for these is attached to this letter as **Attachment 1**. Please note the caveats around measuring total area and length of GIS features.

*9. How does your council maintain SNAs?*

Greater Wellington does not actively maintain regional significant natural areas as a blanket rule. However, there are means by which they are passively maintained, and some are actively maintained.

Regional significant natural areas are passively maintained by ensuring any activity that is carried out that might affect them is regulated by the PNRP. There many policies and rules dictating what can

and cannot be done in these sites, ranging through permitted activities with conditions, controlled, restricted discretionary, discretionary, non-complying and prohibited activities.

Some regional significant natural areas scheduled in the PNRP are also part of Greater Wellington's [Key Native Ecosystem programme](#). This non-regulatory programme provides active protection (pest plant and animal control and some restoration) to 57 sites around the region, chosen for their representativeness across the region's ecosystem types, regardless of their status as regional significant natural areas or not. The programme includes some sites that are scheduled in the regional PNRP and terrestrial sites that are either identified, or likely to be identified, as significant natural areas in district and city plans. There are also other targeted programmes that Greater Wellington operates that aim to restore particular sites which are also regional significant natural areas, for example the [Wairarapa Moana Wetlands Project](#).

*10. How many consents have you issued in the last five years to allow for vegetation clearance in SNAs? How many have been declined?*

In the last 5 years Greater Wellington has received and granted ten resource consent applications that included requests for vegetation clearance that were also within regional significant natural areas scheduled in the PNRP. None were declined. The majority of these were for clearing weeds or exotic species to help with restoring wetlands or fencing and waterway redirection for wetland protection and extension. The remainder included:

- Wetland reclamation at several sites involved with the Transmission Gully project
- Vegetation clearance involved with plantation harvesting which impacted a section of a scheduled stream
- Inundation of a wetland to create a dam, with the vegetation clearance offset by restoring a connected extent of stream banks
- Weed clearance for flood protection within a scheduled stream.

All consents are granted with a range of conditions that are designed to avoid, mitigate and remedy the environmental impacts of the activities.

It should also be noted that our pre-application process allows prospective applicants to take advice on their projects before submitting an application. This allows them to consider whether their expected environmental effects could be sufficiently avoided, mitigated or remedied in order to have a resource consent granted. Due to this process, it is likely that unacceptable proposals are not submitted or substantially modified to make them more acceptable when they are submitted.

*11. Do you have vegetation clearance rules that enable identification of additional SNAs through the consenting process?*

No.

However, the Regional Policy Statement (RPS) requires local authorities to follow a process for protecting significant indigenous biodiversity on a case-by-case basis if they have not identified significant natural areas. The policies related to this are explained below:

Policy 23 of the RPS requires local authorities (regional, district and city councils) to identify and evaluate indigenous ecosystems and habitats with significant indigenous biodiversity values. They are to use the criteria set out in the policy.

Policy 24 of the RPS requires local authorities to have in their plans, 'policies, rules and methods to protect indigenous ecosystems and habitats with significant indigenous biodiversity values from inappropriate subdivision, use and development.'

Policy 47 of the RPS is a 'stop-gap' measure if Policies 23 and 24 have not been implemented. It requires planners to consider whether the effects of a proposed activity are likely to affect significant indigenous biodiversity and provides a list of matters that they are to consider. They must also use the ecological criteria in Policy 23 to help with this assessment. This process does not lead to formal identification and scheduling of new significant natural areas. However, it may help to inform any processes for identifying them in the future. Once Policies 23 and 24 are implemented by a local authority, Policy 47 no longer applies to consent applications.

We are happy to discuss any of these responses with you to help provide any further context necessary. Please contact Micheline Evans, Team Leader of the Biodiversity Strategy and Advice team if you wish to do so – [micheline.evans@gw.govt.nz](mailto:micheline.evans@gw.govt.nz).

If you have any concerns with the decision(s) referred to in this letter, you have the right to request an investigation and review by the Ombudsman under section 27(3) of the Local Government Official Information and Meetings Act 1987.

Please note that it is our policy to proactively release our responses to official information requests where possible. Our response to your request will be published shortly on Greater Wellington's website with your personal information removed.

Nāku iti noa, nā



Wayne O'Donnell  
Kaiwhakahaere Matua | General Manager, Catchment Management Group

## Attachment 1

SNAs request			
Schedule A and Schedule F (polygon features) combined area: 619.650678km2, 61965.067835 hectares*			
Schedule	No of features	SUM_Area_ha	SUM_Area_km2
Schedule A1: Rivers with outstanding indigenous ecosystems values	6	328.58	3.29
Schedule A2: Lakes with outstanding indigenous ecosystems values	3	7308.08	73.08
Schedule A3: Wetlands with outstanding indigenous biodiversity values	14	1484.43	14.84
Schedule F1b: Known rivers and parts of the coastal marine area with inanga spawning habitat	34	1205.11	12.05
Schedule F1c: Lakes with significant aquatic plant communities	3	88.73	0.89
Schedule F2a: Habitats for indigenous birds in rivers	9	1034.82	10.35
Schedule F2b: Habitats for indigenous birds in lakes	2	7234.9	72.35
Schedule F2c: Habitats for indigenous birds in the coastal marine area	43	11376.1	113.76
Schedule F3: Identified natural wetlands	194	2090.69	20.91
Schedule F4: Sites with significant indigenous biodiversity values in the coastal marine area	54	29813.64	298.14
	<b>362</b>		
Schedules F1 combined length: 7168.96km**			
Schedule	No of segments	Length (km)	Length (m)
Schedule F1: Rivers and lakes with significant indigenous ecosystems - Habitat for 6 or more migratory indigenous fish species	8707	5552.44	5552439.29
Schedule F1: Rivers and lakes with significant indigenous ecosystems - Habitat for indigenous fish species of conservation interest	8810	5677.65	5677652.12
Schedule F1: Rivers and lakes with significant indigenous ecosystems - High macroinvertebrate community health	5320	3222.01	3222011.84
	<b>22837</b>		
* Due to overlapping polygon extents the combined, dissolved area of all schedules is less than the sum of each schedule			
** Due to overlapping river segment extents the combined line length of all schedules is smaller than the line of each schedule			