10 March 2020

Ministry for the Environment

Via email: indigenousbiodiversity@mfe.govt.nz;

Re: Draft National Policy Statement for Indigenous Biodiversity - consultation

Whanganui District Council supports the intention to strengthen the policy and management framework for indigenous biodiversity, and recognises the ongoing national challenges in managing New Zealand’s biodiversity. The Council broadly supports the objectives and policy intentions proposed, and acknowledges the additional knowledge and tools that this work will provide us to support indigenous biodiversity in the District.

Council is however very concerned about the resourcing levels required for implementation of the NPS by territorial authorities (and key partners). There are significant bodies of work for the Whanganui District Council associated with the policy statement including:

- New District Plan work;
- Identification of Significant Natural Areas (SNAs) across the District;
- Hutia te Rito high level of engagement, partnership and delivery of NPS with tangata whenua;
- Promotion of new ‘restoration’ work for degraded SNA or connecting areas and support for highly mobile fauna;
- Increasing indigenous vegetation cover;
- Contribution to the Preparation of a Regional Biodiversity Strategy;

In order to effectively implement the National Policy Statement, territorial authorities (particularly within provincial areas which typically have much smaller operating budgets and staff resources) will require central government funding to complete the mapping and identification of SNAs, District planning work as well as supporting the process of engagement with tangata whenua through the Hutia te Rito proposal.

Council is also concerned about the availability of suitably qualified persons to undertake the assessments of the SNAs across New Zealand to meet the specified timeframes. This is likely to be a particularly significant challenge for territorial authorities.
Council recommends that:

- Central government funding be available to territorial authorities to undertake the identification and assessment of the SNAs.
- The availability of suitably qualified persons to undertake the assessments of the SNAs across New Zealand be taken into account when specifying completion timeframes.
- Mapping of SNAs be a collaborative exercise between Regional and Territorial authorities, recognising the in-house ecological expertise and existing experience held in Regional Councils.
- Land managed by the Department of Conservation or other existing protected land be deemed to be SNAs. Council does not consider there to be a significant benefit from further assessing land administered by the Department of Conservation or otherwise protected land.

Yours sincerely,

Hamish McDouall  
Mayor  
Whanganui District

Kym Fell  
Chief Executive  
Whanganui District Council