

SUBMISSION – Proposed National Policy Statement for Indigenous Biodiversity

From: [REDACTED]

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My [REDACTED] and I have owned the property at [REDACTED] for the past 16 years.

The property consists of [REDACTED] hectares and has been farmed continuously for the past 150 years.

Our farm has been beset over the past 35 years with interference by the Hutt City Council, the Wellington City Council, Greater Wellington Regional Council (GWRC) and now by the NZ Government.

We and the previous owners have encountered:

Proposals for the farm to be used for a sewerage plant and sludge storage in 1985.

Almost the entire property being covered by Significant Natural Resources in the 1990s.

Proposals for a wind farm in 2004.

Permanent degradation of our stream and wetlands by GWRC.

Draft SNAs covering 80% of the property in 2018.

I absolutely agree with the fundamental concepts outlined in 1.7(1) of the Draft Policy Statement –

“People are part of and dependent upon the natural environment and ecosystems”.
“It recognises that we have a role as stewards or kaitiaki of indigenous biodiversity”

However, history has usually shown that the best guardians and stewards of the land are those that own it, care for it and protect it.

I, therefore, **OPPOSE** the following Implementation Requirements:

3.6 Precautionary approach

How on earth could local authorities possibly know if there was an adverse effect that was potentially significant, if the effect was uncertain, unknown or little understood? This has the potential to expose every proposed activity as significant without limitation.

Relief Sought - REMOVE

3.7 Social, economic and cultural wellbeing

(a) *“that the maintenance of indigenous biodiversity contributes....”*

(e) *“the importance of respecting and fostering the contribution....”*

Most farmers have always been aware of the connection between indigenous biodiversity contributing to their social, economic and cultural wellbeing of both themselves and their community.

Relief Sought - It is important that the NZ Government **acknowledges and admits** the contributions by all landowners and does not just pay “lip service” to (e).

This should not be a “Land Grab” of private land.

3.8 Identifying significant natural areas

The criteria of SNAs being adopted by this National Policy Statement potentially incorporates all areas (private and public) that have **any** flora, fauna or physical features that are indigenous as long as they are included in any one of the four criteria.

With the criteria encompassing such a wide range and having the ability to capture every indigenous species, I believe it has then deemed every species to be Significant and so forming the context that nothing is Significant.

Relief Sought - Identify SIGNIFICANT natural areas under a much stricter basis (significant must be iconic, highly valued and esteemed).

Previous assessments done have been totally inaccurate.

3.9 Managing adverse effects on SNAs

Exemptions are provided for in subclauses (2), (3) and (4).

However, subclause (2) a), b) and c) all include the word “and” referring each subclause to the next finishing with subclause d) which is very constrictive.

Relief Sought - Remove the word “and” from subclause c)

3.12 Existing activities in SNAs

Clause (4) b) is reliant on the definition of SNA and as I have already pointed out in 3.9 if that definition is too wide this could render any regrowth as significant, disabling a farmer from clearing land that is an existing activity.

Relief Sought – Identify SIGNIFICANT natural areas under a much stricter basis.

3.13 General rules outside SNAs

This implementation requirement (IR) is treating land outside SNAs as part of the Significant Natural Area. This is making a mockery of SNAs – where do they begin and end, who decides, who knows??

Relief Sought - REMOVE

3.16 Restoration and enhancement

There are farms all over the country that have areas of small wetlands that have been part of their farming activity since the land was first cleared. These areas have not been degraded by farmers but exist side-by-side with the farming operation.

(5) ...local authorities may provide incentives for restoration and enhancement and in particular on Maori land, in recognition of the opportunity cost of maintaining indigenous biodiversity on that land.

Relief Sought - Any restoration provisions must be treated as non-regulatory and incentives provided for all landowners in recognition of the opportunity cost of maintaining indigenous biodiversity.

3.17 Increasing indigenous vegetation cover

Clause (7) states that a regional council must include objectives etc for increasing indigenous vegetation cover in its region. This assumes that whatever indigenous vegetation currently exists, it will not be enough.

Relief Sought - There must be a cap and Public land (i.e. regional parks) must be included in the percentage assessment of indigenous vegetation cover.

I wish to be heard in support of my submission if there is a hearing. Dated 10.03.20