



11 March 2020

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Hon David Parker  
Minister for the Environment  
Parliament Buildings  
Molesworth Street  
Wellington 6011

By email: [indigenusbiodiversity@mfe.govt.nz](mailto:indigenusbiodiversity@mfe.govt.nz)

Dear Minister

**Draft national policy statement on indigenous biodiversity**

Thank you for the opportunity to submit on this draft national policy statement.

In a general sense, the Rangitikei District Council is uncomfortable with the Government's seeming preference for regulation (which the national policy statement is) over legislation (which has a much more open consultation and decision-making process and requires a regulatory impact statement reviewed by the Treasury). Given the resourcing implications of this draft national policy statement, a more direct engagement with the community is important.

Council applauds the intent of this national policy statement but questions the affordability. Given that vegetation areas are readily identifiable, it is unclear why a targeted approach based on that evidence was not taken at least as the initial focus for the national policy statement rather than requiring a total ecological assessment of the country. We have some understanding of the nature of the proposed assessments because of a recent study commissioned over the Taihape Scenic Reserve. This is managed by the Council and has significant botanical values, being in the top 10% of remaining biodiversity sites in the Horizons region. The study was needed because a local community group, the Society of the Friends of Taihape, wishes to develop the recreational experience there including the installation of four bridges.

In addition, Council has serious doubts on the practicability of implementation. There are simply not enough ecologists available to do the assessments within five years which are the foundation of this proposal. We note that this is a point being emphasised by Local Government New Zealand which expresses reservation about the 'one-size fits all' approach and sees a workable solution as focussing on protection of habitat and having central government support for implementation. We agree with that approach. This would go some way to easing our concern of the impact on agricultural productivity, e.g. fencing out stock makes it easier for Old Man's Beard to spread. (This weed together with sycamore have been a major threat in the Taihape Scenic Reserve; they have been reduced by grazing and work undertaken by the community Rangitikei Environmental Group, supported by both the Rangitikei District

Council and Horizons Regional Council.) We note that LGNZ is reporting a number of case studies which highlight the critical importance of positive engagement with farmers.

There does not appear to have been consideration of the likely impact on Maori land-locked land, which typically is densely vegetated. In the Rangitikei District the extent of such land is 33,000 ha. This position is the result of lack of accessible road access, the reasons for which the Waitangi Tribunal is currently examining. While this looks ideal for preserving indigenous biodiversity, it works against improving the well-being of those iwi who own such land. We strongly recommend, therefore, that these areas are removed from the scope of the national policy statement. Alternatively, the compensation provisions need to be expanded to take into account the lost opportunity for economic benefit from these lands.

We believe that the matter is better reserved for regional councils. We agree with Horizons that regional councils have a better understanding of the diversity and spatial extent of regional diversity. Even so, the one size fits all approach is undesirable and costly. We support the view of Horizons that the current adaptive management approach under the One Plan is achieving good results and should continue, alongside non-regulatory interventions and partnerships. We do not support the proposal that regional councils assess the percentage of urban and rural areas in its region which have indigenous vegetation cover and set targets for increasing that cover when it is less than 10% which the affected territorial authority would be expected to meet.

We understand the reason for requiring all local authorities to make or change their policy statement and plans to record Significant Natural Areas (SNAs) and specify a requirement that assessment of environmental effects should include some standard wording. However, we consider it unnecessarily burdensome to require plan change at least every two years to reflect new SNAs rather than including them in the cycle each local authority has for review.

We are disappointed with the scope of the first assessment required within ten years from the Ministry for the Environment: it focusses on the extent of information gathering and changes to plans and policies at regional councils and territorial authorities. We wonder why there is not an emphasis on quantifying the change in indigenous biodiversity, since that is the objective of the national policy statement.

I hope these comments are useful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andy Watson', written in a cursive style.

Andy Watson  
**Mayor of Rangitikei**