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## **SUBMISSION ON THE DRAFT NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY**

### **Introduction**

This Submission is from:

The Surveying Company

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The Surveying Company is a multi-disciplinary Property Development Consultancy that has been providing Planning, Surveying and Civil Engineering services throughout the Waikato, Franklin, Papakura, Manukau and Hauraki Districts for the past 30 years. This includes the application and management of Subdivision Resource Consents and Land Use Consents associated with the use and development of land for both urban and rural activities.

I could not gain an advantage in trade competition through this submission.

Prepared by:

**THE SURVEYING COMPANY LTD**



**VANESSA ADDY**

Senior Planner

Reviewed by:



**CRAIG FORRESTER**

**THE SURVEYING COMPANY LTD**

Director



Draft Provision	Do you?	Our Submission is:	We seek the following changes:
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Over time, New Zealand has suffered significant loss and degradation of indigenous biodiversity and wetlands etc). There needs to be intervention to prevent the increasingly degraded nature of indigenous vegetation and biodiversity generally including wetlands. However incentives, such as subdivision opportunities, are needed in order to protect, restore and enhance these areas given the significant costs involved for the appropriate management of these areas.

There is a demand for rural residential and lifestyle living, and if not provided for with incentive subdivision, this is likely to be provided without any justified ecological or environmental benefits. This is a risk of not acting responsibly for the sustainability of the nation. If the provisions of the NPS for Indigenous Biodiversity required local authorities to provide incentives in their plans, then each individual District Plan can then provide subdivision provisions to suit the needs of their specific area. For example, in-situ subdivision or transfer of a development right/s to more appropriate zones/locations so as to not impact on the SNA, high class soils, and/or character of the zone.

With issues such as climate change, and kauri dieback, encouraging restoration, enhancement and protection of SNA's (or other significant indigenous areas) could be critical for future resilience and sustainability. Enhancement Subdivision has successfully increased the area of protected and managed indigenous vegetation over a number of regions in the past. This method of subdivision should continue to be encouraged looking toward the future.

3.9 Manage adverse effects on SNA's	Support with amendments	We agree with this provision. However, managing Significant Natural Areas (SNA's) from adverse effects also should consider management of the SNA itself, i.e. legal protection, fencing, weed and pest control. We believe that this form of management however should be approached with incentives for the land owner given the costs involved with this level of management. We request incentives be embedded in local authority plans specifically development rights (subdivision).	We request specific management provisions be included for appropriately managing SNA's and significant indigenous vegetation outside an SNA. Further we request subdivision incentives should be included for this increased level of management of SNA's and any significant indigenous vegetation outside an SNA.
3.16 Restoration and Enhancement	Support with amendments	We agree with this provision. However, the provision requires further detail in regards to the types of incentives given by local authorities e.g. subdivision opportunities. Provision 3.16 (5) states that "...local authorities 'may' provide incentives...". This provision does not require local authorities to provide incentives in their plans. If incentives are given to landowners then the rate of restoration and enhancement of wetlands, SNA's, and other areas with indigenous vegetation will be far greater than if no incentives are provided in the plans, as this work is very expensive. Also, the provision of	Amend Provision 3.16 (5) as follows:  (5) In areas to which this clause applies, local authorities <del>may</del> <b>must</b> provide incentives for restoration and enhancement and in particular on Māori land, in recognition of the opportunity cost of maintaining indigenous biodiversity on that land.

Draft Provision	Do you?	Our Submission is:	We seek the following changes:
		subdivision incentives will assist with the cost of implementing restoration and enhancement, so its uptake will be far more widespread.	
3.17 Increasing Indigenous Vegetation Cover	Support with amendments	We agree with this provision. However there must be incentives given for planting to achieve the outlined targets. Provision 3.17 (7) requires every regional council to include objectives, policies or methods for increasing indigenous vegetation cover in its region. If this provision also included District councils then there are more opportunities for incentives to undertake planting to reach targets e.g. subdivision opportunities.	Amend provision 3.17 (7) as follows:  (7) Every <del>regional council</del> <b>local authority</b> must include objectives, policies or methods for increasing indigenous vegetation cover in its <del>region</del> <b>plan</b> and for achieving the targets set under this clause, giving priority to all of the following: a) areas to which clause 3.16 applies: b) areas representative of ecosystems naturally and formerly present: c) ensuring species richness: d) restoration and enhancement at a landscape scale across the region.