

SUBMISSION ON

DRAFT NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY

[REDACTED]

[REDACTED]

[REDACTED]

Q1. YES

Q2. No, we already have similar

Q3. Objectives 1 and 5 conflict a little. We need to say WHERE we must RESTORE, as opposed to just maintain

Q10. The availability of ecologists, collating all the SNA information so that it is meaningful and practical. There appears to be no linkages to Threatened Species etc categories. This removes any ability to nail down objective criteria for managing SNA's that cannot be challenged by developers.

Q11. C

Q12 yes

Q13. Yes

Q14 b and c

Q15. Could be longer as the discussion document outlines is required for Tasman District

Q17 yes

Q19. As implied in my answer to Q10, there is insufficient objectivity around SNA classification to prevent the inevitable challenges from developers. Ecology is an inexact science as we have found in the thousands of challenges from developers since the RMA came into being. Part 3.9 requires a lot more tightening with objective criteria.

Q20. Adverse effects are always going to be balanced against the social/economic need for development. This "need for development" has never been given any objective structure from which to calculate a balance. The Waimea dam in Tasman is a good example where arguments for the need for water and the horticultural advantages of this were pitted against the desire of a few to "save" a two rare species. Unfortunately, with most development, we have the inexactness of economics pitched against the inexactness of ecology. It all comes down to the personell who are the commissioners or on the board of inquiry.

Q22. Yes but perhaps using the objectivity of the Threatened Species categories alongside the SNA criteria.

Q24 No. The definition is far too loose. Proposals for infrastructure must have a CBA attached which uses standard criteria. Any infrastructural proposals can be argued against, or for, depending on who wins and who loses.

Q27. No. Part 3.13 says to specify *where, how, and when* controls are required. We need also to say WHY. This all comes down to the rigid categorization of the importance of species and ecosystems in both science and Planning documents that individuals and developers cannot argue against.

Q31. No. No-one understands the “precautionary approach”. This term needs to be accompanied by an algorithm for decision making. This is easy. Please do it.

Q40. Part 3.17 starts with the right idea but assessment of a region’s “ideal indigenous cover” needs strong community input, and should not be decided by council staff. For instance, the goal of achieving some semblance of pre-human cover for Central Otago is a different consideration than that for Tasman. The critical consideration for the community to consider is whether indigenous “nature” should be isolated into SNA’s and Reserves etc, or whether it should be everywhere.

I favour the latter, and this can be achieved in a Planning and architectural way by using, for instance, the precepts of the Living Building philosophy. Let me know if you would like further information.

Q46. Yes. But this is not easy and council staff and elected councillors need a lot of guidance. Despite a generation of blather about “the environment” and so forth, 99.9% of people have got no idea of how to frame losses and gains for ecological regions and districts, reserves, and SNA’s. Councils and the public need a structure from which to make these assessments.

Q48. Part 3.19 is a complete mess. It is poorly written and uses far too many references to extraneous clauses, subclauses, and sub-subclauses. It MUST be written so that the average person can understand it

PLEASE RE-WRITE PART 3.19

Q51 a

Q53 yes yes yes. But this requires an ecological pre-assessment of all land in the region with potential development qualities so as to avoid an ad hoc response to entrenched development ideologies. We already have tools in place to oversee these processes such as those around use of highly productive land. Council ZONING is never fine-tuned enough for the ecological decision-making required. We need a situation where every citizen of a district is aware of where houses, farms, and factories can go, and cannot go. We are miles from that now. Tasman District can be held up as an example of the complete mess that ensues when such Planning is not in place BEFORE developers get their teeth into it.

Q58 e

Q59. New Zealand has always lacked some tool or framework which says categorically [outside National Parks] “***you cannot develop anything here, so don’t even try***”. The RMA has always allowed a fight to ensue. Such a tool, rule, or framework could be developed and based on **SNA** thinking alongside **soil type** thinking, alongside **Landscape** thinking, alongside **Hazard potential** thinking.

Q60 and Q62. YES. The proposed NPS Biodiversity will not reduce the likelihood of challenges to future council policy and rules as it currently sits. Although I support my own council’s submission [Nelson City Council] on the NPSBioD, and I support the views of the Section 32 Appraisal, being an individual I am able to be more brutally honest and say, ***sorry, not good enough, keep trying***.

Quite simply, we have to have an NPS that forces councils to write Resource Management Plans that leave everyone certain about what is permissible and what is not. Thus the final NPSBioD MUST help councils formulate a rule hierarchy [*the 6 categories from permitted through to prohibited*], and guiding Schedules, which are based on algorithmic thinking, and not the whims of elected councilors, and overly empowered council staff.

Thank you for your good work and for the opportunity to comment.