My general submission is to oppose the National Policy Statement Indigenous Biodiversity.

**What is the cost to landowners of the National Policy Statement Indigenous Biodiversity (NPSIB)?** I have been through the Significant Natural Area (SNA) process from the initial survey to operative plan so can help answer this question.

In the 1970’s the government were offering land development incentives to clear native vegetation. However, like many other farmers in this area, my parents chose to retain a lot of the native vegetation. Around [number] hectare farm still has native vegetation as shown in the two photos below.
Note the wilding pine in the above photo. We have recently had the helicopter, at our cost, remove the wilding pines in our native bush.

When the Forest Wildlife Service and then later Department of Conservation (DOC) wanted to do surveys we let them on, even though other farmers said don’t trust them. In 1995 the local council, using this survey information, desktop mapped SNA’s. This included hectares of our farm.

Over the next 6 years of district plan process, appeals and mediation we ended up with the Environment Court ruling in our favour. The court decision was to remove hectares and leave hectares as potential SNA. DOC and the council fought us all the way and on the last day in court the DOC lawyer offered to reduce our area from to ha.

The financial cost is difficult to quantify. Well over just for the Environment Court process but if you take into account all the meetings, correspondence, mediation – then much more.

There is also the cost of having SNAs and indigenous vegetation rules. This includes having to deal with extra people on our land, consent costs, having to employ consultants and costs associated with having to prove what the effects of our activities are on indigenous biodiversity. A big concern, and there is now evidence (e.g. from the Christchurch District Plan process and West Coast) that having areas mapped, or the potential to be mapped, on your land is a disincentive to intending purchasers and can significantly impact property values. The figure in the Christchurch District Plan hearings
was loss of property value for an hectare property having mapped as an SNA.

All of this amounts to a huge opportunity cost. Millions of dollars wasted on a tick box process to see if indigenous vegetation is significant or not.

However much more concerning, was the personal cost. SNAs caused arguments in families and communities as some wanted to walk away from the process (let the council win), whereas others wanted to fight. It is really difficult to express in words the 6 year hell we went through all because our family retained our native bush and allowed access for surveys.

Recently our council in 2016 went through a district plan review and proposed removing all mapped and regulated SNAs. This was because the SNA approach was counterproductive, turned biodiversity into a liability and didn’t achieve positive environmental outcomes. Removing SNA’s from the District Plan was supported by the community and with the approval of the independent hearing commissioners and no appeals, has since become law. In place we have many landowner initiatives including landcare groups, pest control and predator trapping groups, the newly formed landowner initiated Hurunui Biodiversity Trust and hundreds of private initiatives benefiting indigenous biodiversity.

Our family have recently started a QEII covenant process and this system is so much better. It gives us choice, we can design the rules to suit our farm, confidentiality, trusted advisor and help with identifying and implementing the priority management actions.

My submission is that the proposed National Policy Statement Indigenous Biodiversity is completely on the wrong track and should be withdrawn and redrafted. I seek a solution that:

- Doesn’t penalize landowners that have done the most to protect indigenous biodiversity on their land.
- Maintains indigenous biodiversity as an asset, not a liability.
- Allows councils to design their own indigenous biodiversity policies for their communities.
- Removes the mandatory requirement for surveys.

On this last point, there are many landowners (including ourselves) in this area that will not allow council or DOC surveys after being treated so badly last time. Those that allowed surveys were the ones that were punished the most. The photo below is of a sign that is now appearing on many gates and demonstrates a planning system that is failing to achieve positive outcomes.
NO TRESPASS
THE GATE IS NOW CLOSED.
ALL ACCESS IS NOW FORBIDDEN TO ANY NATIONAL OR LOCAL GOVERNMENT EMPLOYEES & DEPT. OF CONSERVATION STAFF.
(DUE TO RESOURCE MANAGEMENT ACT FAILURE.)