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## **EHEA Submission on Draft (Proposed) National Policy Statement for Indigenous Biodiversity**

The East Harbour Environmental Association (EHEA) **strongly supports the introduction of a National Policy Statement for Indigenous Biodiversity.**

**EHEA especially sees a need to protect indigenous biodiversity on privately held land, and to do so we need local councils to implement Significant Natural Area provisions in their district plans.**

The need for SNA provisions in district plans has been significantly increased by amendments to the Resource Management Act which outlaw so called “blanket tree protection” rules. By removing blanket tree protection, the government weakened protection of biodiversity by local councils, and in consequence SNA provisions have become absolutely essential.

And **we definitely support the target of ten percent coverage of indigenous vegetation in urban areas** – and the need to bring up to this level any area that has not already attained this level.

The community needs to be involved in developing these, but EHEA believes that councils require support and guidance to implement SNA provisions. We know of at least 2 local councils that have struggled to bring in such provisions.

**We therefore support the following:**

**Regional biodiversity plans;**

**National Planning Standards.**

As regards National Planning Standards we note that though the Discussion document ([https://- see www.mfe.govt.nz/publications/biodiversity/he-kura-koiora-i-hokia-discussion-document-proposed-national-policy](https://www.mfe.govt.nz/publications/biodiversity/he-kura-koiora-i-hokia-discussion-document-proposed-national-policy)) advocates the introduction of these, no mention of such appears in the Draft NPS.

Not only would these two measures assist councils to bring in SNAs but they would also improve national consistency in the implementation of such provisions.

We also believe that **indigenous biodiversity should be protected on publicly owned conservation land**, and that all such lands should automatically be considered to be Significant Natural Areas unless specifically exempted. Councils should not have to go through the process (which takes time and resources) to identify and map SNAs on public conservation land.

EHEA also believes in the protection of native species whether they live only in a designated area or whether they move from one area to others.

We further believe that **restoration and enhancement of indigenous biodiversity is very important**. In this regard EHEA has for many years been involved in removing noxious plants from public and private land within the East Harbour area with a view to enhancing/restoring the indigenous biodiversity of our local environment.

**Climate change consideration also needs to be central to any national policies to protect and enhance indigenous biodiversity** as climate change is putting significant stress on our indigenous flora and fauna, and we support inclusion in the NPS of the impact of climate change.

## **Compliance**

EHEA is concerned that the Indigenous Biodiversity NPS, as proposed, contains no requirement on councils to comply with the introduction of SNAs – though there are provisions regarding monitoring. We have experience with a local council which has flouted for many years the requirement to bring SNA provisions into our district plan.

And further to this issue of compliance, we believe that not only should councils be required to bring in such provisions within 5 years, but that there should be some central government mechanism to ensure that they do so. It should not be left up to poorly resourced environmental groups to take councils to court to insist they do.

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