

# KAIKOURA DISTRICT COUNCIL SIGNIFICANT NATURAL AREAS

## Time and Cost Estimates for Completion of a District-wide Survey

*February 2020*

### 1 Introduction

This brief report provides estimates of the likely time and cost required for completion of a Significant Natural Areas (SNA) survey of Kaikoura District. It has been prepared at the request of Matt Hoggard, Strategy, Policy and District Plan Manager, Kaikoura District Council.

### 2 Background

The requirement for a District-wide SNA survey is proposed in the recently released Draft National Policy Statement for Indigenous Biodiversity (NPSIB). A recent review of existing SNAs in Kaikoura District<sup>1</sup> identified limitations in the survey and mapping of those SNAs, and provided recommendations to address those limitations. The time and cost estimates in this report are based on those recommendations and on my experience with SNA survey projects over a period of more than 20 years in other districts (Nelson, Tasman, Grey, Ashburton, Timaru, Mackenzie and Waitaki).

### 3 Time and Cost Estimates

It is very difficult to provide precise estimates of the likely duration and cost of a District-wide SNA survey project. Duration and cost are dependent on a number of variables including, but not limited to, the:

- availability and cost of staff/contractors;
- landowner engagement/access to properties;
- quality/adequacy of existing SNA reports;
- availability of recent ecological information;
- assessment criteria and policy direction.

These uncertainties mean that the estimates provided in this report must be regarded as “ball park” figures that provide only an indication of the likely cost and duration of a District-wide survey.

Time and cost estimates are separated below into those required for completion of the already-surveyed (existing) SNAs, and those required for survey of potential SNAs

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<sup>1</sup> Kaikoura District, Review of Significant Natural Areas, Mike Harding, November 2019.

### 3.1 Existing SNAs

A total of ninety-three (93) SNAs were surveyed and documented in recent years by Geoff Walls (Taramoa Ltd). However, these SNAs do not appear to have been mapped on Council's GIS, or their boundaries adequately documented. Tasks required to complete and finalize these "existing" SNAs are:

- map (electronically) SNA boundaries (on Council's GIS)
- divide/separate aggregated SNAs
- re-name SNAs (so each has a unique name/number)
- check or reassess SNA boundaries
- provide updated SNA information to, and consult with, landowners

Mapping/dividing/naming the existing SNAs (excluding field survey) is estimated to cost approximately \$5000<sup>2</sup>. This would require about a week's work and could be undertaken relatively soon.

Provision of the updated (mapped) SNA information to landowners, and consultation with those landowners, is estimated to cost between \$10,000 and \$25,000. The wide cost range is due to uncertainty about the extent of earlier consultation and landowner acceptance. This consultation may be more efficiently undertaken by Council staff. It would require two to five weeks' work, spread over a longer period.

The cost of checking/reassessing SNA boundaries (ground-truth or field-survey) is difficult to assess. It would be most appropriately undertaken as part of a future field-survey project (below).

### 3.2 Potential SNAs

An assessment in 1995 identified 155 potential SNAs in Kaikoura District<sup>3</sup>. Fifty-four (54) of these areas have been wholly or partially surveyed; 101 have yet to be surveyed. Some of these areas have since become public conservation land (administered by DOC), so are a low-priority for survey, and may not require field survey. Conversely, continued depletion of indigenous vegetation nationally and an increasing number of 'at risk' and 'threatened' indigenous species mean that the 1995 assessment is dated. There will now be a considerable number of additional potential SNAs to be surveyed.

Experience from other Districts indicate that there will likely be hundreds (possibly close to 1000) SNAs in Kaikoura District, depending to some extent on how SNAs are described. For example, a twelve-year project in Timaru District identified more than 700 SNAs. Most Councils with which I am familiar are undertaking an on-going SNA survey project. Budgets for these projects are from fifty-thousand dollars (\$50K) upwards per year.

Cost estimates for future SNA survey projects will be affected by the Draft National Policy Statement for Indigenous Biodiversity (NPSIB), if it becomes policy. This policy requires mapping of SNAs within five years, and ongoing mapping of SNAs (every two years). It is

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<sup>2</sup> All cost estimates exclude GST.

<sup>3</sup> Moore, S.; Grove, P. 1996. *Areas of Significant Conservation Value, Kaikoura District*. Department of Conservation, Nelson. 195pp.

unclear whether there is sufficient national capacity (experienced ecologists) to achieve this policy goal. Furthermore, the significance criteria in the draft NPSIB are clearer and more inclusive than the criteria previously used to estimate potential Kaikoura District SNAs.

The costs of surveying and documenting (reporting and mapping) are, in my experience, between \$1000 and \$3000 per SNA. Council staff or independent contractors would incur the lower costs; larger companies would incur the higher costs. Consultation costs vary, depending on the success of the project. I am unable to estimate the associated administration and planning costs as this task is normally undertaken by Council staff.

I expect there would be between 500 and 1000 SNAs in Kaikoura District. Some of these SNAs have been surveyed, but may require further survey to clarify or confirm boundaries. Based on these assumptions, the estimated cost of an SNA survey project for Kaikoura District ranges from \$500K to \$3 million, excluding Council administration and planning costs.

The time required to complete a District-wide survey would depend on the availability of experienced ecologists and the Council budget for the project.

#### **4 Summary**

In summary, the likely costs of completing a District-wide SNA survey of Kaikoura District are estimated to be:

- **\$15,000 to \$30,000** (plus GST) to complete and finalize “existing” SNAs
- **\$0.5 million to \$3 million** (plus GST) to survey potential SNAs.

Note that these cost estimates exclude associated Council administration and planning costs, and exclude the cost of any subsequent ongoing SNA surveys.

Please note that the estimates provided in this report must be regarded as “ball park” figures that provide only an indication of the likely cost and duration of a District-wide survey.

**Mike Harding**  
**9 February 2019**



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## Submission of the Kaikoura District Council

4.23.54

[Indigenousbiodiversity@mfe.govt.nz](mailto:Indigenousbiodiversity@mfe.govt.nz)

### RE: Submission Draft National Policy Statement for Indigenous Biodiversity

#### 1.0 Acknowledgment

The Kaikoura District Council would like to thank the Ministry for the Environment, Manatu Mo Te Taiao for the opportunity to make a submission on the Draft National Policy Statement for Indigenous Biodiversity.

#### 2.0 Kaikoura Background

2.1 Kaikoura District is the smallest mainland Council in New Zealand with a population of 4110 at the 2018 Census. At present we have 3029 separately used or inhabited properties and approximately 2800 ratepayers. A large proportion of our land is controlled by the Department of Conservation and Land Information New Zealand.

2.2 As we recover from the November 2016 Kaikoura Earthquake mean annual earning for our district has increased. Mean annual earnings are now \$51,032 over \$10,000 below the national average. Post-earthquake our resources are stretched, and rates have increased 25.4% since November 2016. Approximately every \$76,000 Council spends is a 1% increase in rates. Overall Council staff consists of a small team of approximately 41 versatile employees. The planning team responsible for Environmental Policy, District Plan review, Resource Consents, Special Projects and Land Information Memos and our Significant Natural Area review. The team consists of 5 staff members of which two positions are vacant.

2.3 As a community we value, protect and enhance Kaikōura's unique natural environment and biodiversity and sustainably manage disposal of waste. We recognise that fundamentally biodiversity is very important for our district, we are a marine mammal tourist destination. Our tourism largely depends on our unique natural environment and biodiversity.

#### 3.0 Comments on Draft National Policy Statement for Indigenous Biodiversity

3.1 Given our reliance on our unique natural environment and biodiversity we support the general direction of the DNPSIB and note the approach is laudable. However, the current draft results in a number of significant impacts on our community which concerns our Council. This submission is intended to focus on the concerns as opposed to the benefits of the DNPSIB. As a community we are aware of the benefits of biodiversity and our community has led the way with projects such as Te Korowai which strives for good stewards for the integrity of our marine environment. We are also acutely aware of the financial burden the NPSIB will place on our community. It will be both difficult and costly for our Council to implement. Council **strongly opposes** the direct **financial burden** which is **placed on our community** by the Draft National Policy Statement for Indigenous Biodiversity.

3.2 Under current criteria of the Canterbury Regional Policy Statement Kaikoura has approximately 29,703ha of potential area of SNA. This area is likely to increase under the DNPSIB. An ecologist has

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estimated that Kaikōura is likely to have close to 1000 SNA's see Appendix 1. Given the large area of potential SNA's any mandatory timeframes the NPSIB will have a significant impact on our rates take. We are of the view that the Draft Section 32 analysis significantly underestimates the one off financial cost and ongoing financial costs to our District as shown in Table 1 below. These are likely real costs of between \$852,500 to \$3,465,000 over 6 years plus \$37,500-\$125,000 per year ongoing, which must be funded by our ratepayers. The 2.6 million dollar difference reflects both Council and our advisors don't know what we don't know and are very aware it will be very difficult to source ecologists as all districts in NZ will be trying to undertake surveys at the same time.

Table 1: High Level Comparison of Financial Costs:

Task	Draft Section 32 evaluation	Kaikoura Assessment
SNA Mapping Costs - Ecologist	\$700,000 to \$1,300,000	\$500,000 to \$3,000,000
SNA Mapping Costs – Council Staff	Not provided	\$60,000 to \$80,000
All reasonable steps tangata whenua engagement	Not provided	\$30,000 to \$50,000
Ongoing ecological surveys	Not provided	\$30,000 to \$50,000 per year
GIS mapping support	Not provided	\$5000 to 10,000
Plan Changes	\$200,000 to \$250,000	\$250,000
Plan Change Updates	\$15,000 to \$30,000	\$15,000 to \$150,000 every second year
<b>Total</b>	<b>\$915,000 to \$1,580,000</b>	<b>\$890,000 to \$3,590,000</b>

3.3 In addition to the direct financial costs much uncertainty exists about the ability to meet the suggested statutory timeframes. Does New Zealand have sufficient national capacity (experienced ecologists) to achieve the policy direction? Does tangata whenua have sufficient national capacity to achieve the policy direction? If they do not what reasonable steps is expected of council to assist in achieving this?

3.4 With Councils high proportion of Crown Land we are well aware of the struggles the Crown like many of our land owners face. Increasing pressure from weeds such as boom, gorse and wilding pines have the potential to degrade our unique biodiversity. The cost of such control is typically increasing. Policy 11 seeks “to provide for the restoration and enhancement of specific areas and environments that are important for maintaining indigenous biodiversity” Such a policy can only be supported in our community if the Crown becomes a positive influence by leading the way. This is occurring in projects such as the Clarence/Waiiau Toa River weed control programme supported by the Kaikōura Water Zone. It is recommended that the policy be changed to reflect the need for Central Government to lead by example when managing Crown property. As a community we have seen Central Government move mountains to enable key road and railway linkages. The landscape scaled changes which have occurred when central government get involved in active management is applauded and active management of biodiversity is encouraged.

3.5 The 188 page Section 32 report is still in a draft format which raises questions as to when the final Section 32 will be made available and if additional submission period will be opened. The current timeline provided by MFE does not provide for a final version of the Section 32 assessment to be released



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#### 4.0 Specific Changes Requested

4.1 The timeframe to give effect to the NPSIB be extended to ensure that no more than a 1% rates increase results from the NPSIB or financial assistance be provided to territorial authorities based on the number of SNA mapped.

4.2 Policy 11 be reworded to state:

**Policy 11:** to provide for the restoration and enhancement of specific areas and environments on Crown Land that are important for maintaining indigenous biodiversity

4.3 The term “reasonable steps” is defined within the document

4.4 The a final Section 32 report is released and time provided for feedback on the final Section 32 report.

#### 5.0 Summary

If meaningful changes are to occur to provide additional protection to New Zealand’s biodiversity adequate time and sufficient resourcing must be available. We have seen landscape scale improvement in our district were adequate resources have been provided. The current Draft National Policy Statement for Indigenous Biodiversity provide neither the resources nor the time.

The Draft is a laudable document which is not practicable in the provided timeframes and resources. Kaikoura District Council **strongly opposes** the direct **financial burden** which is **placed on our community**.

The Kaikoura District Council thanks the Ministry for the Environment, Manatu Mo Te Taiao for considering our submission on the Draft National Policy Statement for Indigenous Biodiversity. We wish to speak to our submission if the opportunity arises.

**Endorsed at the Kaikoura District Councils meeting 26<sup>th</sup> February 2020**

Appendix 1 – Mike Harding Time and Costs Estimates for Completion of a District-wide Survey