We recognise and agree with what the NPS on indigenous biodiversity is trying to achieve. We are very concerned and worried that the current wording of the draft NPS on indigenous biodiversity will create the potential for us to be forced to actively manage the SNAs (Significant Natural Areas) and the land bordering them on our farm.

We strongly advocate against the central government direction to require councils to maintain biodiversity in a way that includes restoration and enhancement goals, we seek the provision of mitigation and flexibility policies to be adopted instead of a one size fits all approach.

We are particularly concerned that the policies that are meant to protect our existing business (Policies 3.12, 3.13, ) are instead going to create uncertainty and confusion as currently drafted.

In our case, the work and fencing required is nearly more than the property is worth, and would create a significant weed problem, ruin the aesthetic and kaitiakitanga values we hold, and create a them and us situation with the council, where we are forced to do something we can't, that is just too hard and doesn't sit well with us.

The burden on councils to require landowners to actively manage SNAs represents further cost to landowners in the form of increased rates as most councils are not equipped to do this work.

Councils need to work with landowners, with a collaborative educational approach, tapping into the experience and ideas of farmers who have already an appreciation of the practicalities involved.

A flexible approach would allow the implementation of new thinking as it emerges, rather than imposing large capital expenses on landowners. For example in areas where fencing is unsuitable management practices can be adjusted to discourage stock from entering SNAs.

Our story

Bordered by a bush reserve on two sides the land was unusual in that it had not been clear felled when broken in, but cleared sensitively with individual large trees retained on ridges and plateaus then exotic grasses sown around them. Steeper valley ridings surrounding springs feeding small streams were untouched with mature kanuka and understory.

In 2006 two sites were identified for the Matamata-Piako District Council as SNAs, the areas amounted to  in 2 sites separated by exotic pasture.

"The remnant is surrounded by grazed pasture, is not fenced, has a broken canopy and an understory of primarily exotic pasture, hence it is termed "treeeland" rather than forest"

"Size and shape - Relatively small and convoluted" ref 1
This site comprises kanuka treeland spread across three steep gullies in the upper Mangawara Stream catchment. Kanuka is abundant in the canopy, while mamaku and mahoe occur locally. Other species dotted through the canopy include lancewood, rimu, kahikatea, karamu, heketara, rewarewa, koromiko, mapou, and black wattle. The understory lacks substantial cover of native species, with exotic pasture grasses and herbs forming the main ground cover. None of the areas appear to be fenced from livestock. Steeper parts of the gullies, including edges of the small streams are more densely vegetated."

"Size and shape-Relatively large, but convoluted, leading to increased edge effects*Ref 2

Although the area identified is approx. on the aerial map it appears as nearly half the land area, fencing would be substantial as seen in the map. The SNA encompasses open grassland with individual trees. Ref 3

The areas involved are steep and convoluted, with pasture separating them and forming the main component of the understory. Exclusion of stock presents significant problems; it would require substantial fencing, also some areas are unstable with shale type rock close to the surface. There would also be a considerable weed problem over and above what we deal with currently. Fencing on hill country traditionally follows the ridge lines generally in a near vertical direction however a fence across steep ridges not only opens the land up to erosion with a bench track needed. (a flat track wide enough for the fence to sit on solid ground and for animals to walk along side without causing erosion).

We would roughly estimate in the order of [amount at current cost incl. gst] would be required for post and batten fencing alone with approximately a further [amount for bulldozer/digger work for benching]. We have dismissed electric fencing as being unsuitable not only due to animal health concerns but the constant problem of falling debris rendering the fence ineffective.

Our policy has always been to manage the property in the most environmentally friendly way we could, with the following mitigation:
- Stock water was reticulated where we could so animals would prefer to stay out of the streams the traditional water source - we recognised even at that point the sheer scale and cost of fencing and damage that would ensue in terms off erosion and stock treading made fencing out of the question, instead we chose to mitigate,
- The stocking rate was reduced and with it grazing pressure with course accepting less income.
- We run cattle between [amount], this class of stock seem most suited to the land, younger cattle suffer animal health problems and older cattle are too heavy creating treading damage.
- The result of reduced grazing pressure was an increase in weed infestation, we recognized this as part of the cost of protecting the landscape.

On average, weed control has involved [amount] of spot spraying annually as well as chemical and occasionally having the helicopter tackle areas which had got out of control we estimate the value of this work as [amount].
- Some kanuka was successfully planted along stream banks without fencing as with the lower stocking rate - the cattle tended to leave them alone.
- Concrete posts are used as erosion protection where streams were exhibiting scouring and the integrity of the bank was challenged.

Over the years we have found varying the stocking rate an important tool and have managed to adjust it and grazing management so areas were less challenged also recently we have found spelling the whole property at certain times of the year beneficial and works with our trading policy.

Reversion by kanuka has become a problem in certain areas, where it enhances bank
stability we encourage it but in some areas where it encroaches on grassed plateaus it has become a problem.

As a landowner we want to look after the land just as much as everyone else, we need to be listened to - we have a lot to offer. We want to work with, not against council - but councils should not be put in the position of legally having to wield a big stick forcing us into capital expenditure when we can not generate the income to pay for it.
Currently there is a feeling of fear amongst land owners -(several of our neighbours refuse to have council staff on their land.) fearful as to the outcome.

Yours faithfully

Ref 1. Site information- Natural areas in Matamata-Piako District
Ref 2 Site Information- Natural areas in Matamata-Piako District
Ref 3 Aerial map site.