

Submission

Proposed National Policy Statement – Indigenous Biodiversity

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Introduction

1. Ashburton District Council ('Council') welcomes the opportunity to submit on the proposed National Policy Statement for Indigenous Biodiversity (the NPS). This submission is being made on behalf of the Council, who approved the submission on 27 February 2020.
2. Located between the Rakaia and Rangitata Rivers respectively to north and south, and an hour's drive south of Christchurch, Ashburton District has a land area of over 6000km² which extends from the Pacific Coastline to the east, through lowland plain onto foothills and river valleys and ending at the eastern face of the Southern Alps.
3. Ashburton district has experienced moderate and sustained population increase since 1996, with growth of over 33%¹. The expansion of irrigation and agricultural diversification on the Canterbury Plains have been major factors in this growth.
4. As a Council, we take seriously the role we play in caring for our native biodiversity. As well as Council-led biodiversity projects such as those at Wakanui Beach, Lake Camp and Lake Clearwater, we have also offered Biodiversity Grants for community projects since 2009.
5. We lead the Ashburton District Biodiversity Working Group (a community group of representatives from a range of organisations) whose purpose is to:
 - Coordinate the implementation of the Ashburton District Biodiversity Action Plan.
 - Maintain partnerships between local and regional organisations with interest in the management of indigenous biodiversity.
 - Provide a forum for discussion and community-wide promotion of biodiversity.
6. Council supports in principle the intentions and aims of the NPS and in particular the national direction for biodiversity efforts across New Zealand.
7. Council appreciates the opportunity to comment on the NPS and through this submission makes the following comments.

¹ Source: Statistics New Zealand Census 2018

Overview

8. Council agrees there is a need for national direction that supports indigenous biodiversity management under the RMA, however it has significant concerns about the practicality of what is proposed, resourcing implications and cost.
9. Council's experience is that identification and protection of indigenous biodiversity, especially on private land, can be contentious and must be carefully addressed. Lack of compensation for landowners may lead to advance destruction of biodiversity that the NPS seeks to protect. Council agrees with the comments in the Regulatory Impact Statement (RIS) that stakeholders may be concerned over constraints of land use and landowners may be dis-incentivised from protecting biodiversity. Some of these landowners are also dealing with the impacts of proposed water quality changes and agricultural emissions. Moreover, related issues such as highly productive land, plantation forestry and the one billion trees programme creates the potential for conflicting priorities. This reinforces the need for support for landowners as well as councils.

Implementation and Resourcing

10. The RIS estimates costs of \$590,000 to \$1,095,000 per Council spread over five years, plus Plan Change costs (\$71,000 to \$247,000). Biannual updates to Significant Natural Area (SNA) schedules will incur further costs. As a district with a large amount of land to review, including remote high country stations, it can reasonably be expected that the costs for Ashburton District will sit towards the higher end of this range.
11. These additional costs need to be considered within the wider context of other expenditure incurred through administering the RMA. This Council loan-funded its last District Plan review. The cost was \$2.28 million, paid back over a fifteen year period ending in 2027. The next review of the District Plan will be commenced next year, six years before the loan from the last review has been repaid. These costs are not sustainable, especially for smaller Councils. It is respectfully suggested that the Government will need to provide funding to cover the cost of the work required to implement the NPS, and it is encouraging to read in the RIS that the provision of central government guidance, funding and support for councils and landowners is considered critical.
12. Identification of SNAs on public land is useful because it will assist in prioritising voluntary conservation efforts conducted on public land as well as providing a district wide perspective of SNAs. However this Council does not support the option of TAs retaining responsibility for identifying and mapping all SNAs on public conservation land. It lacks the resources to be able to do this. Further, this land is non-rateable so it contributes nothing to Council funds and yet would require Councils to spend public money on its management. Responsibility for this work should lie with the owners/managers of the land, with the results incorporated into the local authority led SNA process.
13. In addition to the financial cost of implementing the proposed NPS, resourcing is an issue. This Council considers that the identification and mapping of SNAs within five years and scheduling within six years is unachievable, as is the requirement to update SNA schedules every two years. We have no in-house capacity, and there are not enough ecologists in New Zealand to carry out the required assessments within the proposed timeframes. Other proposed changes around water quality and climate change will worsen this skills shortage. Council suggests a more realistic timeframe for mapping and scheduling of SNAs is 10-12 years, and the updating of SNA schedules every 8 years.
14. Technical guidance and implementation support will be essential, especially for smaller Councils that do not employ specialist staff.

Appendices

15. Council supports the provision of appendices, which provide useful clarification. Biodiversity offsetting and compensation (Appendices 3 and 4) are complex matters which have proved problematic in resource consent assessments and which the principles will help to clarify.

Council thanks the Ministry for the Environment for the opportunity to submit.



HAMISH RIACH
Chief Executive



NEIL BROWN
Mayor