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**Sent:** Friday, May 21, 2021 9:57 AM  
**To:** haveyoursay  
**Cc:** Melissa Sinton  
**Subject:** QEII submission on Waitomo DC draft LTP (2021-31)  
**Attachments:** QEII submission on Waitomo District Council draft LTP and draft Rates Remission Policy.pdf

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Ata mārie,

Thank you for the opportunity to give feedback on Waitomo District Council's draft Long-Term Plan 2021-31. Please find QEII's submission **attached**.

We do not wish to speak to this submission at a hearing. Any queries regarding QEII in the district should be referred to our local Regional Representative, Melissa Sinton.

Ngā mihi,  
Kate



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21 May 2021

## **QEII submission on Waitomo District Council draft LTP and draft Rates Remission Policy**

We welcome the opportunity to comment on Waitomo District Council (WDC)'s draft Long-Term Plan (2021-2031) and draft Rates Remission Policy. Our comments relate to the council's role in protection of indigenous biodiversity in the region, and the opportunity for QEII and Waitomo DC to work together for conservation outcomes on private land.

### **1. QEII in Waitomo District – partnering with landowners to protect indigenous biodiversity on private land**

QEII plays an important role in biodiversity conservation in the Waitomo District. We partner with private landowners to place covenants on their land to protect areas with open space values, in perpetuity. The scope of 'open space' is wide: covenants protect areas of cultural, historical, landscape, and most often, land with high indigenous biodiversity and conservation values.

An open space covenant is an agreement between QEII and a landowner to legally protect the open space values of an area. The covenant document sits on the land's title and is passed with the land to all subsequent landowners. The covenant document sets out what activities can and cannot be done inside the covenanted area.

Our Regional rep for the district, Melissa Sinton, facilitates our work on the ground through trusted relationships with landowners and the rural community.

QEII regional representatives monitor covenants on a biennial basis, as well as offering support to landowners to enhance and manage their covenants to ensure the best outcomes for the values protected. Covenant protection is in perpetuity, and QEII works hard to uphold this protection.

Our positive and trusted relationships with landowners, the financial support we offer for covenant establishment, and the ongoing support and advice our reps give landowners for ongoing stewardship of their covenants are all essential for the success of the QEII model.

We support landowners by matching their contribution to the costs of establishment fencing for stock exclusion, paying for a survey of the area to be protected, and providing an 'establishment grant' for pest plant and animal control or revegetation where appropriate. We also run an annual contestable fund through which covenantors can apply for funding to continue stewardship of their protected areas.

There are 128 registered covenants in the Waitomo District, protecting approximately 5,693 hectares of privately owned land, with more at varying stages of the registration process. Most of these covenants offer protection for areas with high-biodiversity value. There are many more areas of indigenous biodiversity in the district in need of protection. QEII also owns and manages two properties for their conservation values: Tumutumu Bush and Robert Houston Memorial Reserve.

We work with many councils across the country to support landowners on their conservation journeys. We can see further opportunities for QEII and WDC to collaborate more over the next ten years to accelerate the protection of indigenous biodiversity on private land in the Waitomo district.

## 2. Draft Rates Remission Policy

The draft Rates Remission Policy does not include a provision for rates remission on land protected for conservation purposes. It is our understanding that WDC automatically provides for rates relief on land protected by QEII covenants. While this is highly valued by the landowners we work with, we would like to see this provision safeguarded and included in the council's policy for rates remission.

We would like to see the council amend the draft Rates Remission Policy to include remission of rates on land protected for conservation purposes (including but not limited to protection by QEII and Ngā Whenua Rāhui).

Many councils across the country have rates remission policies which intentionally include QEII covenants and other land protected for high biodiversity values. This is our preferred approach as it safeguards the use of rates remission for this purpose and creates certainty for landowners and council staff. This is particularly important where council staff may change, and knowledge of QEII and covenanting may vary across the council.

We note that the operative District Plan (2009) refers to rates remission under Part 2, Section 14 'Conservation Zone, *"Incentives: The Council operates a rate relief policy for areas of privately-owned indigenous vegetation that is either protected by appropriate covenants .... the policy provides for full remission of rates on qualifying areas of land."* Amending the Rates Remission Policy as we have suggested would create consistency with this statement in the district plan.

Rates remission for land protected by QEII covenant is highly valued by the landowners we work with. While the financial advantage of rates remission for landowners is often small, it sends a signal to the wider community that their participation in biodiversity protection is valued and encouraged by the local council.

Having an explicit provision for rates remission on land protected for conservation purposes in the council rates remission policy may help to increase awareness among the community of this supportive mechanism for landowners undertaking conservation work. This could help to incentivise more landowners to voluntarily protect areas of indigenous biodiversity on their land with QEII (or through another legal mechanism).

## 3. Biodiversity conservation in Waitomo district

The next ten years will be very important for conservation in the district. There is still a lot of work to be done to work with private landowners to protect the indigenous biodiversity that remains. The expectations from our communities around the kind of environment they want to live in are growing, and this is accompanied by a changing policy landscape.

The likely introduction of an NPS-IB (National Policy Statement for Indigenous Biodiversity) this year will mean increased regulatory responsibilities for the council regarding biodiversity. It is expected that this will require all local authorities to identify and map Significant Natural Areas (SNAs) within their boundaries and introduce provisions to maintain them – including but not limited to managing adverse effect through the District Plan.

We are aware that Waitomo District Council was taking a proactive approach to identifying SNAs and that many landowners have now been notified of the presence of potential SNAs on their property. We strongly support the council continuing this program, including working with landowners to ground-truth potential SNAs. We also recommend that the council look to put in place support (e.g. a contestable fund) for landowners to undertake conservation activities in these identified areas. It is our observation that early engagement and support for landowners helps to smooth the transition towards a regulatory framework.

We see opportunities for QEII and Waitomo District Council to work together to facilitate this work on private land. Around the country, other Councils have successfully incentivised private land conservation by contributing to fencing costs or pest plant and animal control when landowners commit to protection through QEII covenants. We would be happy to discuss opportunities to work together further with the council.