**Template paragraphs for a submission on Auckland Rates Remission Policy**

***Please adopt material from this template, but make the submission in your own words, as it will have more weight.***

I have an open space covenant with Queen Elizabeth the Second National Trust on my land. I have read the Proposal to amend Auckland Council’s Rates Remission and Postponement Policy and I strongly object to the proposal.

The Auckland Council needs to recognise the contribution of private land conservation to the region by deeming covenanted land non-rateable, as provided for in the Local Government (Rating) Act 2002.

Auckland Council should deem covenanted land non-rateable because;

* Covenantors make a valuable contribution to land management in the Auckland region that other landowners do not make. I would like the Auckland Council to recognise the contribution my covenanted land makes to the protection of indigenous biodiversity, the natural landscape, and many other unquantifiable community services. My covenant is protected for the benefit of all New Zealand, and can no longer be developed.
* My covenant is particularly important because [……………………….]. I spent in the order of XXXX dollars to establish this covenant, and every year I am undertaking YYYY activity to protect and enhance its biodiversity at XXXX cost. The investment I am making in my covenant benefits the whole community.
* My story is not unique. A 2017 study by the Waikato University Institute for Business research has found that on average QEII covenantors spend $64,108 to establish a covenant, and a further $5,964 annually on maintenance and enhancement. In addition, this research found covenantors have foregone income in the order of $137,783 net present value per covenant (calculated over a 30-year period) by their decision to restrict future use and development of their land.
* In the case of Auckland’s 279 covenants this equates to:
* one off landowner expenditure to establish 279 covenants of $17.8 million
* annual covenant maintenance expenditure of $1.663 million
* income foregone of $38.441 million.

This puts in perspective the $59k annually currently offered in rates remission by the Auckland Council. The current rates remission provided under legacy schemes averages out at $595 per annum for the 99 covenants that receive the remission, against an estimated annual expenditure of $1.663 million by the 291 covenantors in Auckland .

* The least the Council could do is recognise this contribution and acknowledge that covenants are non-rateable.
* Grants schemes will not encourage landowners to establish new legal protection for biodiversity, which is a critical means of preventing habitat loss in the region. Deeming land non-rateable gives a clear message to landowners of the significance and importance of legal protection. It supports the efforts of the landowner.
* We all need to be encouraged to protect our indigenous biodiversity. It is not only the job of the Department of Conservation or councils, because our indigenous biodiversity lives on private land as well as public. You need landowners willing to protect their land to do this.
* The Local Government (Rating) Act 2002 lists land that is fully non-rateable and this includes “land owned or used by, and for the purposes of… the Queen Elizabeth the Second National Trust” [Schedule 1- Part 1 – section 5 (b) LGR Act 2002].
* Parliament provided for this rates exemption for QEII because there is a public benefit when land is protected by the QEII National Trust. Councils should not charge rates on land protected by QEII National Trust, as this is contrary to the Local Government Rating Act 2002.
* Auckland Council has specific responsibilities in relation to the management and maintenance of indigenous biodiversity which are supported when landowners enter into legal protection with QEII National Trust covenants. Auckland Council’s responsibilities are articulated in the Resource Management Act 1991 and, to a lesser extent (at least in respect of biodiversity/open space), the Local Government Act 2002. Under the RMA, biodiversity management with respect to regional councils and unitary authorities such as Auckland is an outcome-based mandate. That is, the wording is directive that something should be *achieved*.
* Regional councils have the function of ‘the establishment, implementation, and review of objectives, policies, and methods for maintaining indigenous biological diversity:’ (RMA s30(1)(ga)). The proposed Auckland Council policy would fail to encourage private investment to maintain and enhance biodiversity in Auckland via QEII Covenants, undermining biodiversity in the Auckland region.