

MINUTE 22 REPLY

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Representing myself and Buller Conservation Group

I do not like the concept of a 'Strategic Directions' section in the plan. A discussion page on where the region should be heading is valuable and acceptable, but a whole section of sub-chapters overlaying other proper chapters in the plan is a waste of time and space in both compiling this section and in reading the plan. It is also an ill-conceived concept, making the plan confusing in that these sub-chapters duplicate topics in proper chapters such as mining and natural heritage, except that this section is only a twisted, shallow look, which look we could well do without. Anything of note in the Strategic Directions section would be much better placed in the respective proper chapters in the plan. However this is all probably a moot point now, except that, the shorter this section the healthier the plan will be.

Overall I support the planner's recommendations in Minute 22 (except that the Strategic Directions section should be as brief as possible).

In particular:

2 **What weight should be placed on strategic objectives?**

"strategic objectives should not have primacy over other objectives in the Plan and that there should be hierarchy between these provisions and other objectives and policies in the plan."

I concur

4 Climate change I concur

5-10 Natural hazards I concur

11-14 Regional Policy Statement Direction

b. Use and development of resources - '*reverse sensitivity is only specifically addressed in relation to mineral extraction.....no overarching Strategic Direction on this matter.*'

Do we need a strategic direction on reverse sensitivity? Reverse sensitivity is a fairly basic idea where setting up an activity should not conflict with existing use (notwithstanding caveats). It needs to be left to dissect within resource consent applications.

c. Regionally significant infrastructure - no strategic direction

This needs to be a discussion in the introduction to the relevant chapters, not another strategic direction.

15-17 Economic Development

I concur

18 - 21 *Should there be an Overarching Economic Development Objective with supporting policies and if so how could this be drafted?*

I consider that these proposed objectives and policies would be much better placed in their respective chapters, which would prevent duplication and confusion, except for ED-01, which could be a general statement within the Strategic Direction section.

How would this Objective/Policy approach be used for other Strategic Directions?

I am not objectionable to the inclusions following the question above (notwithstanding my introductory paragraph above), except for NENV - there is no reference to RMA s6a, protecting the margins of waterbodies. I see the proposals for NENV taking the viewpoint that the natural environment is nothing more than a mere carpet which enables economic progression. In trying to increase vitality I have made the following suggestions for amendment:

NENV – P1

In relation to the natural environment recognise:

a. ~~There is substantial contribution to the protection of natural environment values that is made by the existence of public conservation land in protecting significant areas, habitats and features;~~ reserves, SNAs and covenants

Besides duplication in the above proposed policy, what about all the private land that has substantial indigenous value that is also essential for ecosystem services, especially that of the lowlands?

b. ~~The functional and operational need for infrastructure to sometimes be located in significant areas;~~ infrastructure will endeavour to avoid significant areas

As it reads 'b' is encouraging of infrastructure within SNAs. My suggestion does not exclude infrastructure from SNAs but avoidance must be the preferred option.

c. ~~There are lawfully established activities located in significant natural environment areas~~ endeavours to avoid damage;

If there are lawfully established activities then they need to be mindful of where they are situated and thus need to practice stewardship of the indigenous value. This aspect is given no consideration here or elsewhere in the plan.

d. ~~The need to support the ethic of stewardship of indigenous value on private and public lands occurs;~~ and

Who will be supporting the ethic of stewardship? Why just the ethic? Surely what is required is an acknowledgement that not all indigenous value is located within the conservation estate but that private land plays a substantial role in protecting ecosystem services, and private landowners must understand and act on this to protect those services.

e. ~~The need for w~~ Weed and pest control is needed to protect, maintain and enhance natural environment values.

NENV - P2

- Isn't this proposed policy a duplication of that within the ECO chapter?
- SNA project has not completed in the Buller.
- Surely the fact that an area has been identified as an SNA automatically protects it from subdivision, use and development? Isn't that what an SNA is all about? Any deviation from full protection of SNAs needs to be addressed in the appropriate chapter, being ECO.
- NENV - P2 is rubbish.

Urban Form and Development

I concur, except that there should be protection from reverse sensitivity to the urban environment, not just to regionally-significant infrastructure.

I do not support an inclusion of Economic Development in the TTPP Strategic Directions. It would unbalance the TTPP in favour of economic development at the expense of the other important issues encapsulated in Section 5: Purpose of the RMA .

Economic development is an issue particularly important to most West Coasters, but no matter how important it is perceived to be it cannot override other considerations, which would produce a biased district-wide plan. The plan must be balanced and acknowledge that ecosystem services underpin all, absolutely all, our activities.

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