

BEFORE THE TIMARU DISTRICT COUNCIL

IN THE MATTER OF the Resource Management Act 1991

AND the proposed Timaru District Plan

Evidence of Elizabeth Moya Williams
on behalf of the Director-General of Conservation *Tumuaki Ahurei*
Hearing A: Overarching Matters, Part 1 and Strategic Directions
Submitter No. 166 Further Submitter No.166
Dated: 22 April 2024

Department of Conservation | *Te Papa Atawhai*

Private Bag 4715

Christchurch Mail Centre

Christchurch 8140

Solicitor rōia: Ceri Warnock and Alice McCubbin-Howell

Phone waea: 0273436890 / 0272013551

Email ƙmera: cwarnock@doc.govt.nz / amccubbinhowell@doc.govt.nz

Table of Contents

INTRODUCTION	2
CODE OF CONDUCT	2
SCOPE	3
MATERIAL CONSIDERED	3
PART 1 – INTRODUCTION AND GENERAL PROVISIONS.....	4
PART 2 STRATEGIC DIRECTIONS	6
CONCLUSION	8
APPENDIX 1: HIGHER ORDER STATUTORY REQUIREMENTS REFERRED TO IN MY EVIDENCE	9
APPENDIX 2 TABLE OF SUBMISSION POINTS AND RECOMMENDATIONS	13

Introduction

1. My full name is Elizabeth Moya Williams.
2. I have been asked by the Director-General of Conservation Tumuaki Ahurei ('the D-G') to provide expert planning evidence on the proposed Timaru District Plan.
3. This evidence relates to Hearing A which includes Overarching Matters, Part 1- Introduction and General Provisions, General Definitions and High-Level Strategic Directions.

Qualifications and experience

4. I am employed by the Department of Conservation (DOC) in Dunedin as a Resource Management Planner. I have worked for DOC in this role since June 2022.
5. Prior to this I have over fifteen years of experience in resource management, including roles in both consenting and plan development. This includes four years as a planner at the Environment Agency (a national public body in England and Wales), a combined total of eleven years as a Consents Officer at Christchurch City Council, Campbell River City Council (Canada) and Tasman District Council, and more recently two years as a Policy Planner at Dunedin City Council. I have experience in providing input on planning consents and Council plans from a national perspective, processing resource consents including notified/limited notified consents, Section 42A reporting for a plan variation and involvement in plan appeals and Environment Court mediation.
6. I hold a Bachelor of Resource and Environmental Planning with Honours from Massey University.
7. I am an Intermediate Member of the New Zealand Planning Institute.

Code of Conduct

8. Although this is a Council hearing, I have read the code of conduct for expert witnesses as contained in the Environment Court's Practice Note 2023 (the Code). I have complied with the Code when preparing my written statement of evidence.

9. The data, information, facts and assumptions I have considered in forming my opinions are set out in my evidence to follow. The reasons for the opinions expressed are also set out in the evidence to follow.
10. Unless I state otherwise, this evidence is within my sphere of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
11. For the avoidance of doubt, in providing this evidence as an expert witness in accordance with the Environment Court Code of Conduct, I acknowledge that I have an overriding duty to impartially assist the Panel on matters within my area of expertise. The views expressed are my own expert views, and I do not speak on the D-G's behalf.

Scope

12. I have been asked to provide planning evidence in relation to the notified proposed Timaru District Plan, the D-G's submission (submitter number 166), the D-G's further submission, and further submissions lodged on the D-Gs submission.
13. My evidence is divided into the following parts:
 - (a) *Part 1: Introduction and General Provisions; and*
 - (b) *Part 2: Strategic Directions*

Material Considered

14. In preparing my evidence I have read and relied upon the following documents:
 - (a) Proposed Timaru District Plan 2022
 - (b) The Section 32 Evaluation Reports:
 - (i) Overview Section 32 report dated July 2022
 - (ii) Strategic Directions Section 32 report dated May 2022
 - (iii) Supporting Documents: Timaru District Landscape and Coastal Study
10 June 2020

- (c) The D-G's submission dated 15 December 2022 and further submissions dated 4 August 2023 and 18 March 2024.
- (d) The Officer's Section 42a Reports including:
 - (i) Overarching matters Proposed Timaru District Plan: Part 1 – Introduction and General Definitions dated 5 April 2024; and
 - (ii) Proposed Timaru District Plan: Strategic Directions and Urban Form and Development Chapters dated 5 April 2024.

Part 1 – Introduction and General Provisions

Timaru District Plan Definitions

15. The D-Gs submission sought a number of amendments to the definitions. Some of these amendments have been accepted in the Officer's report, and in those cases I agree with the Officer's recommendation and I will not comment further on those points unless there is a matter of clarification required. I provide comments on submissions not accepted by the Officer's recommendation below. A table in Appendix 2 is provided to summarise the D-G's submission points and recommendations made in this evidence based on the s42a report.

Department of Conservation Activity and a new definition - 'Conservation Activity' (Submission Point 166.6)

16. I support the Officer's recommendation to remove the definition of 'Department of Conservation Activity'¹. I accept the explanation provided in the Officer's report² as to why a new proposed definition for conservation activities may not be required given the way the permitted activity rules for conservation activities are set out within the relevant zones of the proposed plan. It is however noted that the term 'conservation activity' is also used within the Public Access Chapter without setting out a list of permitted activities. I therefore support the recommendation that if the Panel are of the mind to include a definition for conservation activity, that the D-G's proposed definition is used. I agree that the proposed definition for 'conservation activity' does not need to list examples (refer to Appendix 2 for revised definition). This will avoid

¹ s42A report: *Part 1 and Overarching Matters*, para 174-178 page 38

² s42A report: *Part 1 and Overarching Matters*, para 266-270 pages 53-54

confusion with the permitted activity provisions for conservation activities within the proposed plan.

New definition - Risk (Submission Point 166.17)

17. I accept the Officer's position³ that the definition of risk proposed in the D-G's submission only relates to risk from coastal hazards and that the proposed plan uses the term 'risk' in other provisions of the plan. The D-G's submission sought the inclusion of this definition only in relation to the natural hazard provisions. However, I agree that the definition submitted is broad and may not assist with providing better clarity for users of the plan when interpreting the relevant natural hazard policies and rules that include this term.

New Definition – Coastal Environment (Submission Point 166.13)

18. In this case, the Director General's submission point refers to the definition set out in the Canterbury Regional Policy Statement (CRPS) within the Glossary and Definitions Section⁴ which contains a definition of the coastal environment referring to the New Zealand Coastal Policy Statement (NZCPS), Policy 1. Of relevance to Timaru District Council is the inland extent of the coastal environment and what this can include. Policy 1, clause 2(c)-(i) of the NZCPS identifies characteristics that may be considered in identifying the inland extent of the coastal environment.
19. In many cases, the inland extent of the coastal environment is difficult to pinpoint through lines on a map given that there are often 'grey areas'. This means identification will often be on a case-by-case basis through the resource consent process. The coastal environment is also not static and will change over time. The limitations of precisely mapping the coastal environment should be noted, and ways to address these limitations provided such as including explanatory provisions within the proposed plan.
20. It is noted that the proposed Timaru District planning maps include a coastal environment layer. The supporting document *Timaru District Landscape and Coastal Study by Boffa Miskell dated 10 June 2020* outlines the methodology used to identify

³ S42A report: *Part 1 and Overarching Matters*, para 287-289, pages 57-58

⁴ CRPS, Page 241

the Coastal Environment⁵ and consideration of Policy 1 of the NZCPS. This is further supported by proposed Policy CE-P1 of the proposed plan which seeks to identify and map the inland extent of the Coastal environment in accordance with Policy 1 of the NZCPS. On reflection, given that both mapping and explanatory provisions (Policy CE-P1) are provided in the proposed plan to identify the coastal environment in accordance with Policy 1 of the NZCPS, I agree with the Officer's recommendation that the definition previously recommended is not required in this instance.

Part 2 Strategic Directions

Objective SD-02 – The Natural and Historic Environment (Submission Point 166.18)

21. The D-Gs submission recommended amendments to strategic directions SD-02 (*The Natural and Historic Environment*). Some of these amendments have been accepted in part in the Officer's report, and in those cases I agree with the Officer's recommendation. I provide further comments on the amendment proposed that was not accepted by the Officer's recommendation below.
22. Firstly, as noted in the Officer's report, the National Policy Statement for Indigenous Biodiversity (NPS-IB) was gazetted in July 2023 which was after submissions closed on the proposed Timaru District Plan. One key change that was made to the gazetted version of the NPS was to amend the overall objective set out in Clause 2.1. The gazetted version introduced the target of '*at least no overall loss*' in indigenous biodiversity and added additional methods to achieve this including clause (iii) '*..by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity....*'⁶.
23. I concur with the assessment made in the Officer's report⁷ which demonstrates that there was little change between the two versions (draft and gazetted) in terms of the policies and clause 3.21 on Restoration. I note that where the NPS-IB provisions are noted in my evidence, this is in reference to the gazetted version.
24. I support the proposed amendments made in the Officer's report to SD-02 clauses (v) and (vi) so that the Strategic Direction is more consistent with the NPSIB

⁵ Timaru District Landscape and Coastal Study, dated June 2020, page

⁶ Refer to Appendix 1 to view the changes made to this objective in the gazetted version of the NPS IB.

⁷ Table on page 25 of the s42A report Strategic Directions & Urban Form and Development

maintenance and restoration requirements⁸ and sets out the environmental bottom line for the Timaru District of “*at least no overall loss*” of indigenous biodiversity (refer to full proposed amendment in Appendix 2). This is consistent with Objective 9.1.1 of the Canterbury Regional Policy Statement (CRPS) which sets out the goal of *halting the decline* of Canterbury’s ecosystems and indigenous biodiversity⁹. This is appropriate given the ongoing threats to the remaining indigenous biodiversity in the district as described in the expert evidence provided by Technical Advisor Mr Richard Clayton (para 21-28, pages 4-5).

25. Objective 9.2.2 of the Canterbury RPS¹⁰ recognises the need for action to restore and enhance fragmented, degraded or scarce natural habitat. I agree that one of the outcomes of maintenance, restoration, and enhancement is improved connectivity and resilience. I therefore support the amendment to clause (v) without the need for additional wording around improved connectivity and resilience. Overall, the proposed amendment to clause (v) sets the overarching direction of the plan to ensure that *indigenous biodiversity* is maintained, enhanced and restored where necessary (refer to Appendix 2 for a full copy of the proposed amendments). As noted in Mr Clayton’s evidence (para 24-28 & para 29-31, pages 5-6) areas requiring the maintenance, restoration and enhancement of indigenous biodiversity within the Timaru District are where there is increasing environmental pressures such as within lowland forests, shrublands, braided rivers, wetlands and limestone outcrops.
26. In regard to the D-G’s submission point relating to a new clause to be added to achieve an *overall net gain* in the quality and quantity of indigenous ecosystems, habitat and indigenous biodiversity (proposed clause ‘x’, refer to Appendix 2), the intention was to set an aspirational goal to improve indigenous biodiversity overall within the Timaru District. However, I have read the Officer’s comments on this point and on reflection, given the amendments proposed to the strategic direction setting the target of ‘no overall net loss’ and the wording now included to protect, enhance, restore (where necessary) and maintain indigenous biodiversity and areas of significant indigenous biodiversity, I agree that this clause is not required. If the Panel are minded to agree to these amendments, review of the objectives, policies and plan provisions within the ECO chapter and other relevant chapters will be required to ensure that these align with this overarching direction.

⁸ NPSIB Clause 1.7 Maintaining Indigenous Biodiversity, Objective 2.1, and Clause 3.21 Restoration.

⁹ Refer to Appendix 1, CRPS Objective 9.2.1

¹⁰ CRPS, Objective 9.2.2 Restoration or enhancement of ecosystems and indigenous biodiversity, pages 140-141.

Conclusion

27. The D-Gs submission contained limited points related to the provisions covered by this topic. A number of points made have been accepted by the Officer's reports and I agree with the reasons for the submissions and for these being accepted.

28. The few points that have not been accepted by the Officers report have been discussed above and I largely agree with the approach recommended by the Officer's.



Elizabeth Williams

RMA Planner

DATED this 22 April 2024

APPENDIX 1: HIGHER ORDER STATUTORY REQUIREMENTS REFERRED TO IN MY EVIDENCE

NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY 2023

1.7 Maintaining indigenous biodiversity

(1) *Maintaining indigenous biodiversity requires:*

(a) *the maintenance and at least no overall reduction of all the following:*

- (i) *the size of populations of indigenous species:*
- (ii) *indigenous species occupancy across their natural range:*
- (iii) *the properties and function of ecosystems and habitats used or occupied by indigenous biodiversity:*
- (iv) *the full range and extent of ecosystems and habitats used or occupied by indigenous biodiversity:*
- (v) *connectivity between, and buffering around, ecosystems used or occupied by indigenous biodiversity:*
- (vi) *the resilience and adaptability of ecosystems; and*

(b) *where necessary, the restoration and enhancement of ecosystems and habitats.*

Clause 2.1 Objective Exposure Draft and Gazetted Version

<i>NPS-IB Exposure Draft June 2022</i>	<i>NPS-IB Gazetted July 2023</i>
<p><i>The objective of this National Policy Statement is to protect, maintain, and restore indigenous biodiversity in a way that:</i></p> <p><i>(a) recognises tangata whenua as kaitiaki, and people and communities as stewards, of indigenous biodiversity; and</i></p> <p><i>(b) provides for the social, economic, and cultural wellbeing of people and</i></p>	<p><i>(1) The objective of this National Policy Statement is:</i></p> <p><i>(a) to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and</i></p> <p><i>(b) to achieve this:</i></p>

<p><i>communities now and in the future.</i></p>	<p><i>(i) through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and</i></p> <p><i>(ii) by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and</i></p> <p><i>(iii) by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and</i></p> <p><i>(iv) while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.</i></p>
--	---

3.21 Restoration

- (1) Local authorities must include objectives, policies, and methods in their policy statements and plans to promote the restoration of indigenous biodiversity, including through reconstruction of areas.*
- (2) The objectives, policies, and methods must prioritise all the following for restoration:*
- (a) SNAs whose ecological integrity is degraded:*
 - (b) threatened and rare ecosystems representative of naturally occurring and formerly present ecosystems:*
 - (c) areas that provide important connectivity or buffering functions:*
 - (d) natural inland wetlands whose ecological integrity is degraded or that no longer retain their indigenous vegetation or habitat for indigenous fauna:*
 - (e) areas of indigenous biodiversity on specified Māori land where restoration is advanced by the Māori landowners:*
 - (f) any other priorities specified in regional biodiversity strategies or any national priorities for indigenous biodiversity restoration.*

(3) Local authorities must consider providing incentives for restoration in priority areas referred to in subclause (2), and in particular where those areas are on specified Māori land, in recognition of the opportunity cost of maintaining indigenous biodiversity on that land.

(4) In relation to activities in areas prioritised for restoration, local authorities must consider:

(a) requiring conditions for restoration or enhancement on resource consents that are new or being reviewed; and

(b) recommending conditions on any new designations.

CANTERBURY REGIONAL POLICY STATEMENT 2021: Chapter 9 Ecosystems and Indigenous Biodiversity

Objective 9.2.1 Halting the decline of Canterbury's ecosystems and indigenous biodiversity:

The decline in the quality and quantity of Canterbury's ecosystems and indigenous biodiversity is halted and their life-supporting capacity and mauri safeguarded.

Objective 9.2.2 Restoration or enhancement of ecosystems and indigenous biodiversity:

Restoration or enhancement of ecosystem functioning and indigenous biodiversity, in appropriate locations, particularly where it can contribute to Canterbury's distinctive natural character and identity and to the social, cultural, environmental and economic well-being of its people and communities.

Objective 9.2.3 Protection of significant indigenous vegetation and habitats:

Areas of significant indigenous vegetation and significant habitats of indigenous fauna are identified, and their values and ecosystem functions protected.

Policy 9.3.1 Protecting significant natural areas.

1. Significance, with respect to ecosystems and indigenous biodiversity, will be determined by assessing areas and habitats against the following matters:

a. Representativeness

b. Rarity or distinctive features

c. Diversity and pattern

d. Ecological context

The assessment of each matter will be made using the criteria listed in Appendix 3.

2. Areas or habitats are considered to be significant if they meet one or more of the criteria in Appendix 3.

3. Areas identified as significant will be protected to ensure no net loss of indigenous biodiversity or indigenous biodiversity values as a result of land use activities.

Policy 9.3.2 Priorities for protection.

To recognise the following national priorities for protection:

- 1. Indigenous vegetation in land environments where less than 20% of the original indigenous vegetation cover remains.*
- 2. Areas of indigenous vegetation associated with sand dunes and wetlands.*
- 3. Areas of indigenous vegetation located in “originally rare” terrestrial ecosystem types not covered under (1) and (2) above.*
- 4. Habitats of threatened and at risk indigenous species.*

Policy 9.3.4 Promote ecological enhancement and restoration.

To promote the enhancement and restoration of Canterbury’s ecosystems and indigenous biodiversity, in appropriate locations, where this will improve the functioning and long-term sustainability of these ecosystems.

APPENDIX 2 TABLE OF SUBMISSION POINTS AND RECOMMENDATIONS

PLAN PROVISION	D-G POSITION	REASON	RELIEF SOUGHT	S42A recommendation	E Williams Planning evidence changes sought
Definition – Department of Conservation Activity (Sub point 166.6)	Oppose	<p>The D-G considers that there should be a wider definition for ‘conservation activity’ rather than making it specific to the Department of Conservation activities. This is given that there are other stakeholders which may undertake conservation activities such as landowners, Forest and Bird and other community groups. This ensures that conservation activities are provided for within the plan which don’t fall under Section 4(3).</p> <p>It is also noted that the description in the introduction of the Natural Open Space Zone provides an explanation of the RMA requirements which exempt activities for land managed under the Conservation Act 1987 so it is not considered necessary to be repeat this in a definition.</p> <p>It is also noted that the term ‘Conservation Activity’ is used in the Rural Zone provisions but there is no definition of what this includes.</p>	<p>Amend the definition as follows:</p> <p>Department of Conservation Activity is an activity listed in APP1-Work or activities of the Department of Conservation. The list includes activities specifically provided for in the Canterbury (Waitaha) Conservation Management Strategy 2016 which it considers meets the requirements of Section 4(3) of the Resource Management Act 1991 for exemptions from land use consents.</p> <p><u>Means the use of land for any activity undertaken for the purposes of management, maintenance and enhancement of ecological values for indigenous vegetation and fauna and their habitats. Examples of component activities of conservation are:</u></p> <ul style="list-style-type: none"> • <u>Restoration planting</u> • <u>Pest and weed control</u> • <u>Track construction and maintenance</u> • <u>Fencing.</u> 	<p>The officer’s report accepts this change in part and states:</p> <p><i>As this policy directly applies to Department of Conservation Activities, I believe the definition for ‘Department of Conservation Activities’ can be deleted without undermining the effectiveness of this policy. Furthermore, the policy wording is consistent with RMA Section 4(3). I recommend to accept this part of the submission by the Dir. General Conservation [166.6] (para 177, page 38).</i></p> <p>The officer recommends that no new definition of Conservation Activity is required and states:</p> <p><i>Based on the above recommendations to submissions, no new definition of Conservation Activity is recommended to be added to the Proposed Plan. For the avoidance of doubt, if the Hearing Panel were of mind to insert a new definition of Conservation Activity, my preference would be for the definition provided by DOC without the listed examples. It is worth noting that if the Panel do recommend to add a definition that consequential changes may be required to rules in various chapters (para 276, page 55).</i></p>	<p>Support S42A report recommendation.</p> <p>If the Panel agree that a definition is required for ‘conservation activity’ the following definition is recommended:</p> <p><u>Means the use of land for any activity undertaken for the purposes of management, maintenance and enhancement of ecological values for indigenous vegetation and fauna and their habitats.</u></p>
Definition: Sensitive Environment	Support with amendments	<p>The D-G supports the definition as it includes the Coastal Environment, Significant Natural Areas and other overlays of significance.</p> <p>However, the D-G seeks that the definition is amended to include the Bat Protection Overlay. It is noted that the definition for Sensitive Environment includes the area within 100m from the edge of a riparian margin however it is not clear whether this would capture all of the area identified for Bat Protection. As the Bat Protection Area is not included in the definition list it is also not explicit that bat habitat is included as a ‘sensitive environment’. Therefore, it is considered that the long-tailed bat habitat identified on the planning maps should be included as a ‘sensitive environment’. This will ensure that the provisions that apply to activities within sensitive environments take into account long tail bat habitat.</p>	<p>Amend the definition of ‘Sensitive Environment’ as follows:</p> <p><i>means</i></p> <p><i>1. areas within the following overlays identified on the Planning map:</i></p> <p><i>a. Coastal Environment; and</i></p> <p><i>b. Coastal High Natural Character Areas; and</i></p> <p><i>c. Drinking Water Protection Area; and</i></p> <p><i>d. Heritage Item; and</i></p> <p><i>e. Heritage Item extent; and</i></p> <p><i>f. Outstanding Natural Features; and</i></p> <p><i>g. Outstanding Natural Landscapes and</i></p> <p><i>h. Sites and areas of Significance to Māori; and</i></p> <p><i>i. Significant Natural Areas; and</i></p> <p><i>j. Visual Amenity Landscapes; and</i></p> <p><i>k. Earthquake Fault Awareness Area; and</i></p> <p><i>l. High Hazard Areas; and</i></p> <p><i>m. Flood Assessment Area; and</i></p> <p><i>n. Seawater Inundation Overlay; and</i></p> <p><i>o. Within 250m from Major Hazard Facilities; and</i></p> <p><u><i>p. Bat Protection Area Overlay; and</i></u></p>	<p>The Officer recommends that this change is accepted and states:</p> <p><i>Dir. General of Conservation [166.11] seeks to include the Bat Protection Overlay as a ‘sensitive environment’ by listing it alongside other overlays identified in the Planning Maps under clause 1. The omission of the Bat Protection overlay from clause 1 of this definition is an error. For this reason I recommend accepting this submission. (para 233, page 48).</i></p>	<p>I support the officer’s S42A report recommendation to include the Bat Protection Area Overlay in the definition for sensitive environment.</p>

PLAN PROVISION	D-G POSITION	REASON	RELIEF SOUGHT	S42A recommendation	E Williams Planning evidence changes sought
			<p>2. the below areas:</p> <p>a. The area within 100m from the edge of a Riparian Margin; and</p> <p>b. The area within 100m from the edge of a Wetland Area; and</p> <p>c. High Hazard Areas identified in a Flood Certificate issued under NH-S1.</p>		
Definition: Coastal Environment (Sub point 166.13)	New	<p>The D-G supports the mapping of the coastal environment, however, seeks the inclusion of a definition of coastal environment consistent with Policy 1 of the New Zealand Coastal Policy Statement (NCPS).</p> <p>The Canterbury Regional Policy Statement (CPRS) defines 'Coastal Environment' as 'The extent and characteristics of the coastal environment is defined by Policy 1 of the New Zealand Coastal Policy Statement (2010)'.</p>	Insert a new definition of 'coastal environment' consistent with the definition of 'coastal environment' in the CRPS.	<p>The Officer's report rejects this requested change and states:</p> <p><i>Due to the broad, general application of the words 'Coastal Environment', the presence of the Coastal Environment overlay, and the many ways in which this term is applied within the PDP I do not recommend to insert a definition for 'Coastal Environment' and recommend this submission is rejected (para 264, page 53 of s42a report).</i></p>	I agree with the s42a report recommendation given the proposed explanatory provisions in the plan and coastal environment area overlay in the planning maps.
Definition: Risk (Sub point 166.17)	New	Insert new definition of 'risk' as this is a term used in the Plan when considering natural hazards.	Insert a new definition for risk consistent with the definition of risk in the New Zealand Coastal Policy Statement (NZCPS).	<p>The Officer's report rejects this requested change and states:</p> <p><i>Risk in planning terms is highly complex and depends on a number of variables. The above definition relates to coastal hazards only and does not relate to other natural hazards such as volcanic eruption, land slide, liquefaction etc. The term is also general and extends into areas of risk other than environmental when it comes to planning for example economic, social and political risk. The general application of this term is reflected in various provisions of the Proposed Plan, as such:</i></p> <ul style="list-style-type: none"> • Identification of areas subject to natural hazards and risk (SD-O4); • Scale and significance of birdstrike risk (EI-R37); • Requirements for source water risk management plans (DWP-R2); • Consideration of significant habitats of at risk or threatened species (NATC-P2); • Reduction of traffic risk within the road corridor (ECO-R1.1 PER-2); • Consideration of public safety risk (PA-R1). <p><i>For the reasons given above I recommend rejecting this submission. (para 288, page 57-58)</i></p>	I agree with the s42a report recommendation given that it is a broad definition relating to coastal hazards and its inclusion may not assist plan users when interpreting the plan provisions.
SD-02 The Natural and Historic Environment	Support with amendments	The D-G supports the intent of the strategic directions for the natural environment but considers that an overarching requirement to promote the increase of indigenous vegetation cover in the district is needed. This is consistent with the draft NPS-IB (Policy 14).	<p>Amend Strategic Direction SD-02 as follows:</p> <p><i>The District's natural and historic environment is managed so that:</i></p> <p>i. <i>the health and wellbeing of the community are recognised as being linked to the natural environment;</i></p>	<p>The officers report accepts in part this submission and recommends the following amendments:</p> <p><i>Amend SD-02 as follows:</i></p> <p><i>SD-02 The Natural and Historic Environment</i> <i>The District's natural and historic environment is managed so that:</i> [...]</p>	I support S42A report recommendation and amendments to SD-02.

PLAN PROVISION	D-G POSITION	REASON	RELIEF SOUGHT	S42A recommendation	E Williams Planning evidence changes sought
		<p>The strategic direction should also set out the maintenance and enhancement of indigenous biodiversity outside of SNAs as required by the RMA (Part 2 (7) & Section 31) and Policy 4, 5, 8 & 13 of the draft NPS-IB which seeks to recognise the importance of maintaining and providing for indigenous biodiversity outside SNAs as well as ensuring that biodiversity is resilient to the effects of climate change and managed in an integrated way. This is also consistent with the Canterbury Regional Policy Statement.</p> <p>It is recommended that for SNAs and indigenous biodiversity outside of SNAs, the wording 'restored' is added to (v) and (vi) in line with the Canterbury Regional Policy Statement (Objective 9.2.2) and the draft NPS-IB (Clause 3.21) which requires Local Authorities to promote the restoration of indigenous biodiversity.</p>	<p>ii. <i>an integrated management approach is adopted that recognises that all parts of the environment are interdependent;</i></p> <p>iii. <i>the natural character of the coastal environment, wetlands and waterbodies is preserved and protected from inappropriate subdivision, use, and development;</i></p> <p>iv. <i>important landscapes and features are protected from inappropriate subdivision, use, and development;</i></p> <p>x. <u><i>there is an overall net gain in the quality and quantity of indigenous ecosystems and habitat, and indigenous biodiversity</i></u></p> <p>v. <i>significant indigenous vegetation and significant habitats of indigenous fauna are identified, and their values recognised, protected, and where appropriate, enhanced, <u>and, where the ecological integrity is degraded, restored;</u></i></p> <p>y. <u><i>indigenous biodiversity is maintained and enhanced; with all indigenous biodiversity having improved connectivity and improved resilience.</i></u></p> <p>vi-vii- <i>the life-supporting capacity of ecosystems and resources is safeguarded for future generations;</i></p> <p>viii <u><i>viii the important contribution of historic heritage to the District's character and identity is recognised, and significant heritage and its values are protected from inappropriate subdivision, use, and development.</i></u></p>	<p><u><i>v. indigenous biodiversity is maintained, enhanced and restored where necessary so that there is at least no overall loss;</i></u></p> <p>vi. <i>significant indigenous vegetation and significant habitats of indigenous fauna are identified, and their values recognised, protected, and where appropriate, enhanced, <u>and where ecological integrity is degraded, restored;</u></i></p> <p>vii. <i>the life-supporting capacity of ecosystems and resources is safeguarded for future generations; and</i></p> <p>viii. <i>the important contribution of historic heritage to the District's character and identity is recognised, and significant historic heritage and its values are protected from inappropriate subdivision, use, and development.</i></p>	