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Memo

From: Surfbreak Protection Society Inc.(SPS)

To GWRC PNRP Hearings Panel

14/09/2017

Subject: clarification of SPS position on Objective 19 of the PNRP

SPS has been asked to clarify our position on Objective O19 of the GWRC PNRP, as we were unaware of the Redline-Chapter-3-Objectives-Hearing-1-2-and-3-and-ROR-1-and-2.pdf (as available from the GWRC PNRP website portal).

We have therefore reviewed our submission in light of deliberated outcomes¹ from the above mentioned strike through document.

While the removal of the term minimised from objective O19 is constructive, SPS are of the view that the new “wording” of Objective O19 does not adequately interpret the intentions of Objective One of the NZCPS:

Objective One

To safeguard the integrity, form, functioning and resilience of the coastal environment and sustain its ecosystems, including marine and intertidal areas, estuaries, dunes and land, by:

- maintaining or enhancing natural biological and physical processes in the coastal environment and recognising their dynamic, complex and interdependent nature;
- protecting representative or significant natural ecosystems and sites of biological importance and maintaining the diversity of New Zealand’s indigenous coastal flora

¹ <http://pnrp.gw.govt.nz/assets/Uploads/Expert-Conferencing-Policy-P4-joint-statement-28-06-2017.pdf>

and fauna; and

- maintaining coastal water quality, and enhancing it where it has deteriorated from what would otherwise be its natural condition, with significant adverse effects on ecology and habitat, because of discharges associated with human activity.

[Emphasis added]

SPS has been asked to comment on the new wording of Objective O19:

Objective O19: Natural processes, including natural elements, patterns and ecological processes continue to occur, and the integrity and functioning of natural processes and forms are retained.

SPS points out that the NZCPS gives a clear direction for consenting authorities to give effect to the NZCPS.²

SPS position is that the new wording deliberated on by the expert witness conferencing held on 28th of June does not give effect to the true intention of the NZCPS.

So with this in mind, SPS wording (in line with the NZCPS) for Objective O19 is:

Objective O19

To safeguard the integrity, form, functioning and resilience of the coastal environment and sustain its ecosystems, including marine and intertidal areas, estuaries, and their margins dunes, headlands, peninsulas, cliffs, wetlands, reefs, freshwater springs and surf breaks, by:

maintaining or enhancing natural biological and physical processes, including water quality, in the coastal environment and recognising their dynamic, complex and interdependent nature

SPS note that it is unfortunate that two of the Hearings panellists have had to declare a potential conflict of interest in regard to involvement with the consent application for the Wellington Airport extension applications.

² Page 7 of the NZCPS 2010: regional policy statements, regional plans and district plans must give effect to this NZCPS

Signed:

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke at the end.

President

Surfbreak Protection Society Inc.