

NEW ZEALAND COASTAL POLICY STATEMENT

- 7 MAY 2008

SUBMISSION NO: 392 NOTED: [Signature]

7 May 2008

Board of Inquiry –
Proposed New Zealand Coastal Policy Statement
C/o The Department of Conservation
PO Box 10 420
WELLINGTON 6143

Dear Board,

This is a brief personal submission on the proposed New Zealand Coastal Policy Statement, made by an experienced planning consultant who was extensively involved in the development of the Resource Management Act. I have worked with the Act ever since, with the present New Zealand Coastal Policy Statement, and with numerous other instruments under the Act. I appreciate the role of the NZPS (and other emerging National Policy Statements) in managing the use, development and protection of the nation's natural and physical resources.

I regard New Zealand's coast as a priceless asset, which needs particular care in its management. I consider that the current NZCPS has been reasonably effective over the past decade or more.

I wish to record great concern about several aspects of the proposed policy statement.

1. The loss of any clear statement of general principles, as in the current NZCPS. These have provided clear and effective guidance, and are not clearly reflected amongst the very extensive loose and often conflicting policy in the proposed NZCPS.
2. The sheer length and complexity of wording of the proposed NZCPS. This creates a forest of analysis into the future for no net benefit, in my humble opinion. In particular, I am concerned about matters that effectively restate rather than elucidating the RMA (eg, objective 2), that set in place matters that have emerged through case law and which are still by no means settled in practice (eg, the "Pigeon Bay" criteria of natural character analysis in policy 32), and that do not recognise issues and limitations of technology (eg, the positive and open-ended recognition of renewable energy developments in policy 17, and issues around wastewater management in policy 48 and 49).
3. I have particular concern relating to policies 14 and 15, which insert loose urban design concepts into the coastal environment through the proposed NZCPS, and which in my opinion set in place a generous basis for new coastal settlements (in reality more likely to become the basis for scattered sprawl). I would be happy to expand on this verbally, but I can see that those policies will result in numerous future issues of interpretation and argument used by developers to justify otherwise unjustifiable new development

proposals. In my opinion, these should be deleted and replaced with the earlier and higher-level concepts of protection against sporadic and sprawling development.

I would, however, wish to acknowledge that the proposed NZCPS does contain some clear and useful material – eg, relating to coastal hazards and precautionary approaches. This useful material should be identified and retained, but much of the policy material in my opinion requires a comprehensive review to make it clear, concise, unambiguous to remove internal conflict, and to significantly reduce length.

I would like to have the opportunity to appear before the Board to expand on this submission.

A handwritten signature in blue ink, appearing to read 'Sylvia Allan', with a horizontal line underneath the name.

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