

Submission Attachment

Malcolm Burns Re RU7

With regards to Plan Change 1 RU 7:

The higher order Objective is Objective 2.2.3 which seeks, amongst other things to enhance indigenous biodiversity. Plan Change 1 RU 7 seeks no change to Objective 2.2.3. Objective 2.2.3 is supported by Policy 2.2.3.3. Plan Change 1 RU7 seeks to amend Policy 2.2.3.3 by removing the ability to enhance biodiversity values. This seems to reduce the ability of Policy 2.2.3.3 to assist in achieving Objective 2.2.3.

In terms of the s32 Report, at paragraph 1029 it states that biodiversity matters are a secondary matter. It is understood the Strategic Direction of the 2GP is not hierarchical. If that is correct, then the view formed in the s32 Report may be skewed.

In terms of the NPS-HPL, as noted in paragraph 1042 of the S32 Report there are some (limited) exceptions in the NPS-HPL. However, the proposed changes do not reflect those exceptions, resulting in some disconnect to the higher order document.

The wider plan change is supported by biodiversity and/or landscape evidence, but none of that specialist evidence relates to RU7.

The key concern raised in the s32 Report, at paragraph 1046, relates to a potential proliferation of applications using the existing pathway (which has been available for some time). However, for context, the s32 Report makes no mention of the number of applications granted consent since the pathway has been available, nor how the proposed change would have impacted those decisions.

Overall, it is considered that the proposed changes do not assist to achieve the key higher order Objective 2.2.3, and RU7 is not supported by evidence. Therefore Plan Change 1 RU7 should be rejected.