

## Golden Bay's outstanding natural features and landscapes August 2016

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### Introduction

This submission has been prepared on behalf of Straterra, the NZ minerals and mining industry body, by:

**Bernie Napp**

Policy manager

Straterra Inc.

PO Box 10-668

Wellington 6143

027 646 1000

[bernie@straterra.co.nz](mailto:bernie@straterra.co.nz)

[www.straterra.co.nz](http://www.straterra.co.nz)

The opportunity to provide feedback to Tasman District Council on the discussion document entitled "Golden Bay's outstanding natural features and landscapes" is appreciated.

### Comment on the locations identified

The map entitled "Map 1 – ONFL Location Map (pdf, 2.3MB)" is supported, as reflecting accurately the work of the Small Group.

### Comment on the draft rule changes

The new information requirements for subdivision, land use and development activities that occur in ONFLs where a resource consent is required are supported, as logical.

Within an ONFL, the proposed new Rules for new earthworks, vegetation removal, and buildings, structures and tracks not associated with an existing activity as restricted discretionary activities are supported, as appropriate in the circumstances, as is the list of matters to which decision-makers' discretion is limited.

Given the above, Policy 9.1.3.4C is strangely worded, i.e., the use of the term "discourage". This is an unusual term to use in RMA planning language, and lacks precise meaning. On one hand, decision-makers are to apply restricted discretion to a resource consent application for development in an ONFL. On the other hand, that same development is to be discouraged. The two statements are at odds with each other, and the whole does not make sense. We suggest deleting Policy 9.1.3.4C as confusing and unnecessary, with the proposed Rules providing appropriate provision for, and regulation of development in ONFLs, in the context of Part 2 of the RMA.