

SUMMARY OF EVIDENCE OF SANDRA MCINTYRE – INTEGRATED MANAGEMENT (IM)

Integrated management

1. At paragraphs 41-48 of my evidence I discuss the role of the PORPS in providing clear direction for the lower order plans about matters that need to be considered and addressed to achieve integrated management. At paragraphs 78-85 I discuss specific concerns relating to the IM chapter.
2. Although the IM chapter generally provides appropriate direction, restructuring and amendment of policies recommended in the section 42A report has, in some cases, weakened the original policy direction on important resource management principles. In particular:
 - a. Prioritising “health needs of people” with life-supporting capacity and mauri (IM-P1) does not align well with section 5 of the RMA [paragraph 83];¹
 - b. Collapsing direction on cumulative effects (IM-P13) into policy focused on managing interconnections (IM-P5) fails to recognise that cumulative effects may also arise in respect to use of a single resource, not only in respect to interconnections between resources [paragraph 80(b)];
 - c. Collapsing the requirement for a precautionary approach (IM-P15) into a policy concerned with avoiding unreasonable delay by using best available information (IM-P6) underemphasises that both of these approaches are intended as means of managing uncertainty [paragraph 80(c)];
 - d. Use of the test “wherever practicable” is inappropriate in reference to identifying limits beyond which the environment will be considered to be degraded (IM-P14 and IM-M1). The test should be whether a limit is needed to achieve the environmental outcomes [paragraph 85].
3. The section 42A report does not accept a Kāi Tahu submission on IM-P5, seeking consideration of effects that cross from one part of the environment into another (such as effects of land use on freshwater or coastal waters). I discuss this in paragraph 82(b) and propose an amendment in Appendix 1.

¹ In my rebuttal evidence [paragraph 45], I discuss why I consider that mauri and life-supporting capacity should be bracketed together.

Climate change

4. At paragraphs 49-52 I discuss climate change considerations that should be addressed in the PORPS. These include natural hazard implications, impacts on natural processes and systems, adaptation in use of resources, and provision for activities that reduce emissions. At paragraph 80(a) and paragraph 84 I discuss concerns about the clarity of direction on climate change in the section 42A recommendations for IM-O4, IM-P9 and IM-P10.

5. In my rebuttal evidence [paragraph 39] I also oppose a proposal by Susan Ruston to amend IM-P12 to remove any discretion for decision-makers to impose environmental limits on activities providing nationally or regionally significant mitigation. I consider this would inappropriately fetter the ability of decision-makers to manage the range of environmental effects of such activities.

Sandra McIntyre