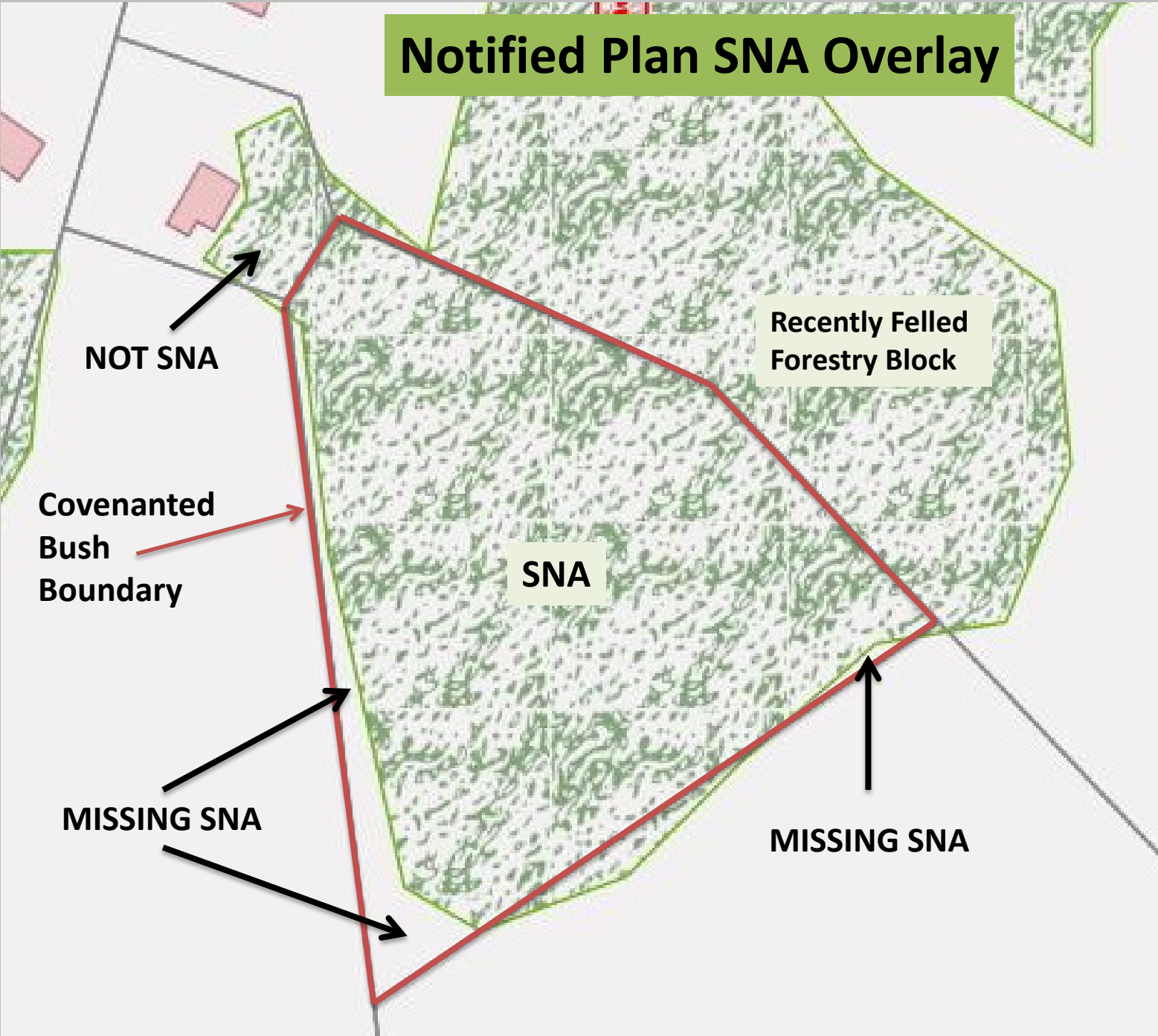


# SUBMISSION #352



24 November 2020

# Notified Plan SNA Overlay



- Council's position up to this point is very unclear:
  - Consultation Phase indicated that the disputed area was clearly NOT SNA.
  - Notified Plan showed that it WAS considered SNA.
  - Email communication with Council indicated again that it would NOT be considered SNA.
  - Under the Section 42a Report it MAY be SNA but yet another process, outside of the hearings process, is required.
- A very frustrating, time/resource consuming and wasteful exercise.
  - We strongly believe that we have submitted sufficient evidence to Council, from the consultation phase to now, to correct the SNA overlay extents on our property.
  - If the intention is to proceed with the ground-truthing and/or Appendix 2 options for determining SNA extents, then firm deadlines and an accessible appeals process need to be put in place as this effectively by-passes this hearings process and restarts the clock.
- At this stage it appears that Council does not regard existing infrastructure & non-native elements as disqualifying an area as SNA, hence:
  - These elements (and their maintenance in terms of earthworks and/or vegetation clearance) need to be addressed fully in the SNA rules under this Plan, and
  - Their existence needs to be recorded to prevent retro-active consents being required, or
  - The criteria/processes defining SNA need to address such elements to prevent SNA from being overlaid on such. Appendix 2 does not currently address this.