

SIAM – 2, C - 4 Component
Environmental, Risk and
Resource Management

**CIM Plan/SM Plan Technical
Review**

Discussion Paper
October 2005

Prepared for
**Ministry of Natural Resources,
Environment and Meteorology**

by
BECA International Consultants Ltd.



Ministry of Resource Management, Environment and Meteorology
Private Bag
Apia
SAMOA

11 October 2005

Attention: Vitaoa Peleiupu Fuatai

Dear Sir:

**RE: SIAM -2, C- 4:Environmental, Risks and Resource Management Services
Discussion Paper on Review of CIM Plans and Sustainable Management Plans**

Further to the discussion in our Inception Report and at the Inception Report Workshop, we have prepared a short paper summarising our conclusions on this matter. We would be grateful if you would circulate copies of this paper to relevant personnel in MNREM and MWTI for their comments. Following receipt of comments we would propose that the agreed way forward be recorded in a minute for the Steering Group's approval.

Yours faithfully



Graeme Roberts
Manager, Planning

On behalf of
BECA International Consultants Ltd.
c/o IPA Ltd. 2nd floor SLAC Building
Corner Vaea and Convent Streets
Apia, Samoa
Ph: (685) 20842; fax: 20843
Email: twells@ipa.com.ws


Beca International Consultants Ltd.



Revision History

Revision N°	Prepared By	Description	Date
A	Graeme Roberts	Draft discussion paper	
B			
C			

Document Acceptance

Action	Name	Signed	Date
Prepared by	Graeme Roberts		
Reviewed by	Don Lyon & Amelia Linzey		
Approved by	Graeme Roberts		11 Oct 2005
for	Wells Theories Trust		

Beca International Consultants Ltd.

Table of Contents

<i>1. Introduction</i>	1
1.1 TOR Requirements.....	1
1.2 Technical Proposal.....	1
<i>2. Inception Report</i>	4
2.1 The PUM Act.....	4
2.2 Resource Implications.....	5
<i>3. Alternative Ways Forward</i>	9
3.1 Initial Options.....	9
3.2 Detailed Steps – Option Three.....	9
3.3 Option Four.....	11
<i>4. Conclusion</i>	12

1.



1. Introduction

This report has been prepared to document the evolution of the Consultant's thinking with regard to the CIM Plans and Sustainable Management Plans and whether or not in our view it would be desirable that the existing and yet to be prepared CIM Plans be converted to SMP's at this time. We recognise that there may well be conflicting views on this matter and we propose this document as a framework for further discussion. In our view this matter is very important to the future development of procedures for coastal infrastructure management, coastal hazard planning and management and general land use planning and management in Samoa.

1.1 TOR Requirements

The contract TOR requires the consultant to:

"Assist PUMA to adapt the CIM Plans completed, under IAM-1 and under this contract, into Sustainable Management Plans (SMPs) under the PUMA Act. Assistance shall take the form of re-drafting of the CIM Plans into a suitable format for SMPs (§12 – 15 and §19 of the PUMA Bill), advising and assisting on any additional consultation required above that already undertaken in the preparation of the CIM Plans (§17 – 18 of the PUMA Bill), and providing advice on issues relating to Development Standards (§32 of the PUMA Bill) and Samoa Planning Provisions (§33 of the PUMA Bill)".

1.2 Technical Proposal

In the preparation of our Technical Proposal we undertook a preliminary review of the requirements of the PUM Act for the preparation of SMP's and formed the view that the CIM Plans as formulated and completed under Stage 1 of the project were close to complying with the requirements of the legislation.

In particular we noted that:

- The plan development process adopted for the CIM Plans is certainly in accordance with the consultative process envisaged in the PUMA Act.
- The combination of the Plan Development and Implementation Guidelines volumes together represent a comprehensive record of the present development pattern of the district.
- The future provision of infrastructure is described and the most cost effective options recommended consistent with the overall theme of "increasing resilience".

Beca International Consultants Ltd.

- The plan provides for the retention of traditional village decision-making processes to continue, consistent with *Fa'a Samoa* and *Fa'a Matai*, whilst at the same time providing a framework within which those decisions can be made in such a way that results in positive environmental and hazard outcomes.

Our initial view was that it would be most productive for the CIM Plans to be developed into SMP's at the earliest opportunity. We proposed to review the PUM Act requirements in detail with relevant MNRE staff and develop a work programme to:

- Convert/modify the existing CIM Plans into SMP's.
- Amend/revise the CIM Plan Handbook and plan content to ensure that future CIM Plans can be promulgated as SMP's.

Regarding Development Standards (s32 of the PUM Act), we suggested that an appropriate approach would be to develop a generic national guideline for village development which could apply to all SMP's. The individual CIM Plans/SMP's could then remain as the "collection place" for the village and district specific infrastructure and development issues. The national village development guideline would allow the village fono and matai to preserve their traditional management role, but within the context of a guideline.

We suggested that the national village development guideline would cover matters such as:

- Location of houses with respect to roads, streams, the coast etc.
- Management of the land-sea interface and protection of foreshore habitats.
- Location of village infrastructure such as schools and churches.
- Wastewater treatment and disposal.
- Rubbish disposal and recycling facilities.
- Roothing and access.
- Commercial use of residential premises.
- Parking.
- Environmental standards and other practical initiatives to provide sustainability.

We noted that the greater detail referenced in s32 of the PUM Act was likely to be more appropriate to areas of extensive urban development such as the main centres of Apia and Salelonga. We further suggested that whilst in due course it may be necessary to move towards more detailed standards for the whole country, our view was that a simpler approach may be an appropriate first step toward encouraging better rural and village development. This would allow more resources to be focused upon the development of management plans for the urban area.

These comments were made in the light of two key factors:

- Professional and financial resources available for this task were very limited and in order that a successful first venture was assured it would best be focussed on areas of greatest need and where clear demonstrable benefits would be assured.
- Our experience in the preparation of the 15 CIM Plans in Stage 1 of the Project had demonstrated that the existing system of village management via the *fono* was working well and that there was much to be gained from maintaining the principle of partnership developed as the fundamental underlying principle for the plans. The PUM Act process proposed that this be changed to a more statutory based relationship where development control was exercised under a statutory plan. We have expressed doubt as to the necessity and desirability of extending this process to the village areas at this stage of Samoa's development.

We proposed that a Technical Paper be prepared for discussion with MNREM outlining the results of the review. This paper is that document.

2. Inception Report

Following discussion with PUMA and MNREM staff during our Inception visits we revised our position and reported on this in the Inception Report. This is restated below.

2.1 The PUM Act

Our preliminary view at the time of tender was that based on our understanding of the new PUM Act, it would be possible to translate existing CIM Plans into Sustainable Management Plans (SMPs) on the basis of the requirements outlined in sections 12-19 of the Act.

It is still our view that the Act contains sufficient flexibility to allow for the CIM Plan process to transition into the preparation of SMPs. However, following our Inception Visit discussions and following further internal discussion, we now have some doubts about the wisdom of such an approach. We have undertaken a detailed clause by clause review of the PUM Act in relation to the CIM Plan Process and SMP requirements. This is attached in Appendix 1.

Our reservations with the relationship between the CIM Plan process and SMP process stem mainly from a philosophical stand point. We also note however, that there are currently no SMPs in draft or finalised so the process to convert CIM Plans might well be the country's first attempt and a bad experience now could impact on wider application of the SMP model later.

It has always been the intention (and we believe is now a widely accepted principle) that the CIM Plan is a non statutory instrument something akin to a 'charter', registering a partnership between government, villages and other key stakeholders to improve community and infrastructural resilience to coastal hazards.

The engagement process with communities has been very effective because of this philosophical stance. We wish to retain such a positive focus for the next 28 plans.

Having further reviewed the PUM Act and discussed this matter further with PUMA staff, we believe that there is a risk of undermining the positive process by moving the CIM Plan process too quickly towards a more regulated framework. In particular, we see significant problems with a quick conversion of the existing 15 CIM Plans, because these were prepared through an intensive community consultation process, in good faith, and without any suggestion that at some point the CIM Plans would take on a more formal and or regulatory function.

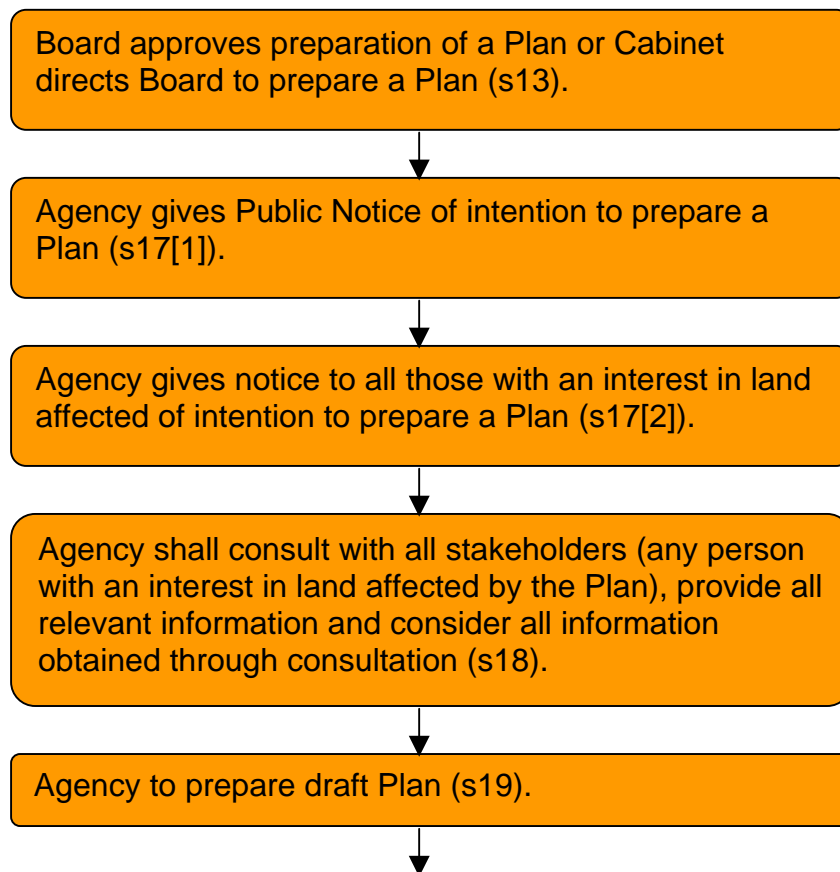
We are also of the view that whilst in due course in may well be necessary to regulate the use and development of land in all Samoa by way of a statutory framework such as an SMP would provide, neither the scale of development nor the extent of adverse effects upon the environment in most of the rural areas of Samoa currently justify such an approach. Indeed there is a suite of other mechanisms available via the PUM Act which will more than adequately allow for the regulation of both land uses and adverse effects on the environment. These include provisions for development

standards and the ability for the drafting of regulations to give effect to the provisions of the PUM Act.

2.2 Resource Implications

With regard to resources, we also have concerns that the process for SMP preparation outlined in the PUM Act and documented in the flow chart set out in Figure 1 following is particularly onerous and has the potential to require a greater level of inputs than are currently available or likely to be sustainable in future. Our reasons for saying this stem from our experience in applying a similar framework in NZ under the Resource Management Act 1991. In Figure 2 we set out the process to develop a District Plan under the RMA. The similarities with the SMP process from Figure 1 are self evident, in particular the degree to which individual stakeholders have the opportunity to make submissions. The experience in NZ has been that District Plans take between 8 and 15 years to become operative and the costs to each District or City Council range between NZ\$2-10 million.

Figure 1 - Preparation of an SMP



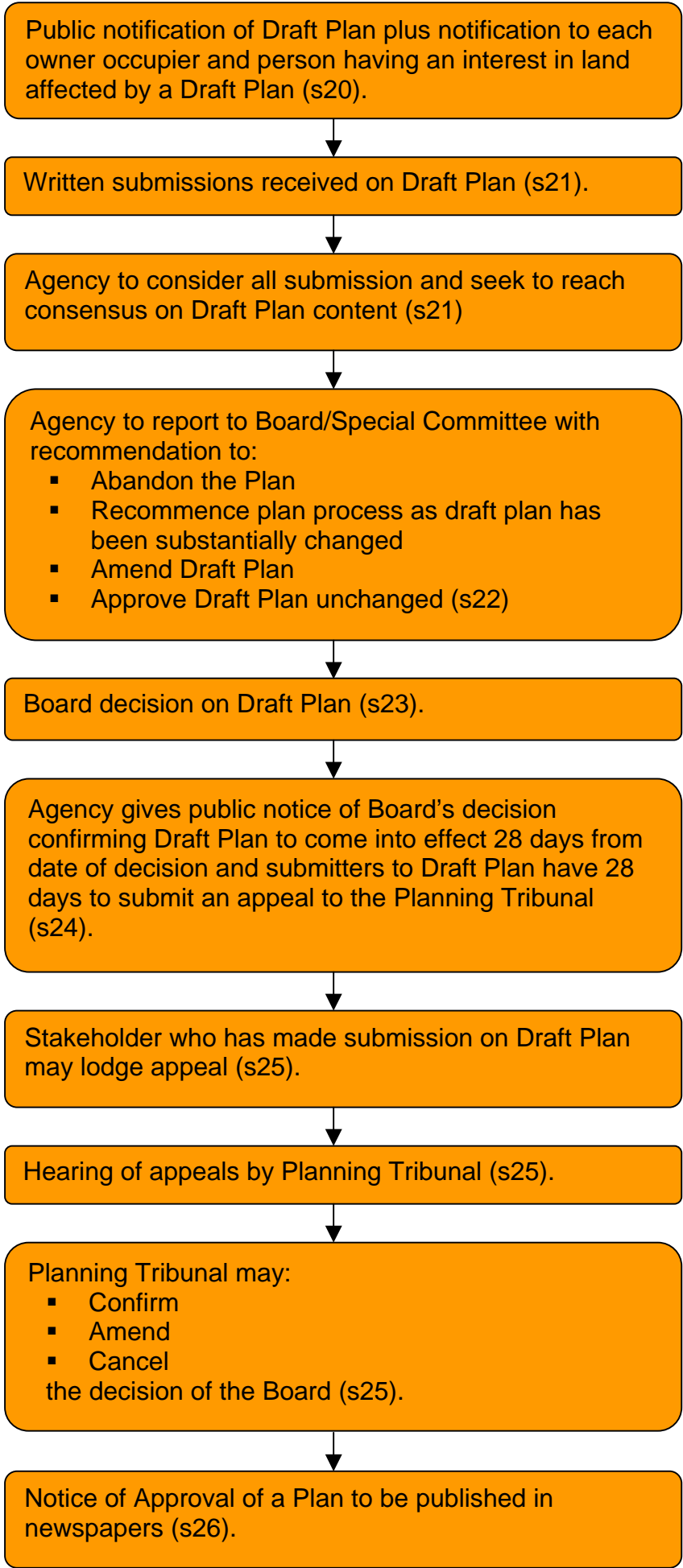
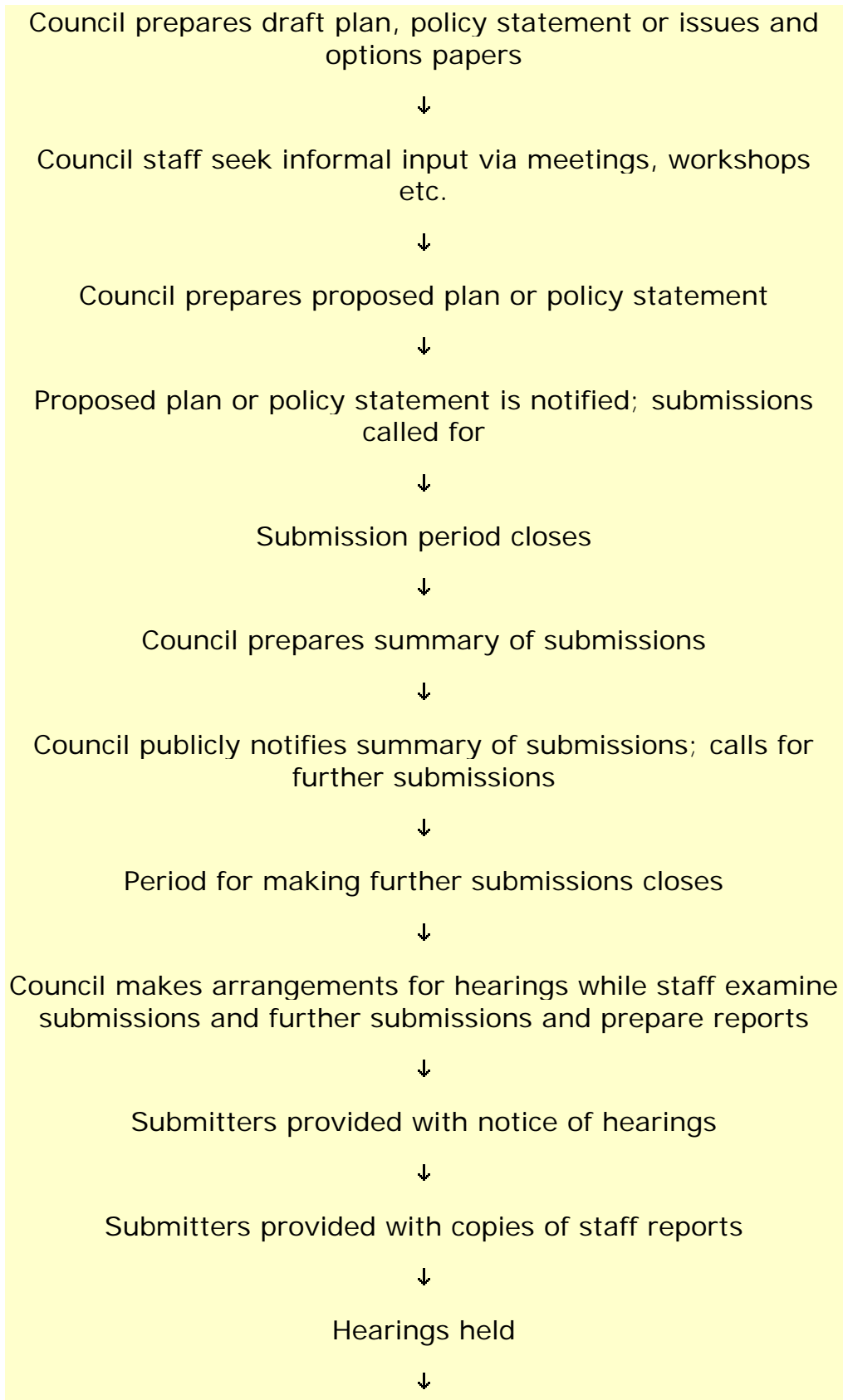
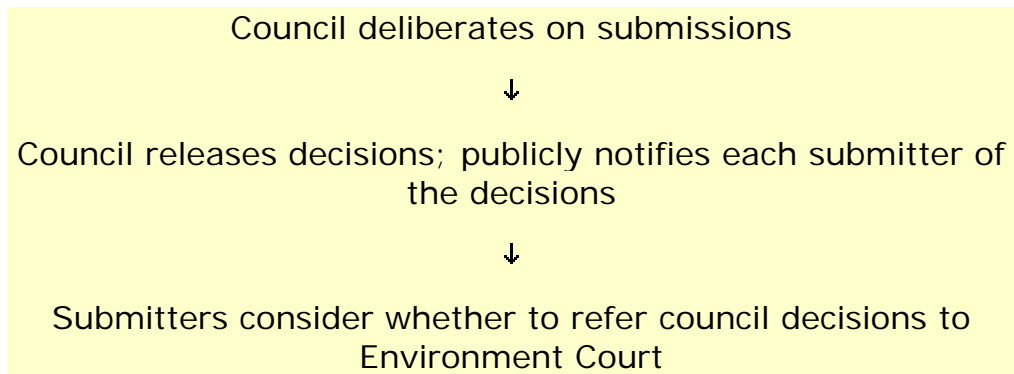


Figure 2 - Process for preparing policy statements and plans





Source: www.mfe.govt.nz

With respect to PUMA resources we have also attempted to evaluate the potential of preparing SMP's for all 48 political districts in Samoa. This analysis, which only takes the plans through the process up to the point of a draft plan being notified, would consume virtually all PUMA's resources for a period of four years or more assuming the 5 staff available would be able to work on this to the exclusion of all other work. In our view, this is not realistic and we would therefore suggest that prior to embarking on a programme of SMP preparation a clear resource requirements analysis be conducted.

3. Alternative Ways Forward

3.1 Initial Options

Having reached this preliminary conclusion as a study team, we have seriously evaluated alternative ways forward. Our initial view was that there were three alternatives:

- Proceed to convert all CIM Plans to SMPs and take them through the prescribed statutory process.
- Abandon the idea and leave the CIM Plans as stand alone planning documents outlining how an agreed partnership approach to improving resilience can be achieved.
- Adopt a pragmatic approach which retains the spirit and intent of the CIM Plan process but identifies ways that some matters can be progressed through to forming the basis for SMPs.

We see real risks with respect to the first option as outlined in the preceding sections. It will fundamentally change the nature of the relationship between village communities and their administration and the Government with respect to land use and development. We have very real concerns as to how this would be received and would suggest a phased/staged approach may be more realistic and prove to be ultimately more acceptable/achievable. We are also concerned at the resource implications of this option.

The second option is also clearly not practicable as it would signal that the GoS has no intention of proceeding with SMP's as the principal means of securing the objectives of the PUM Act, which we assume is not the desired policy position. However it should not be necessary to abandon the potential to convert some or certain aspects of the CIM Plans, either now or progressively in future to an SMP type regime. Hence our preference at this stage would be to adopt the third approach.

3.2 Detailed Steps – Option Three

What we have in mind in this regard is outlined below as a series of logical steps for both existing and new CIM Plans. We also provide a commentary on some of the key issues in Appendix 2.

For existing CIM Plans

1. Review existing CIM Plans to identify key areas and key local recommendations that might be best progressed through a more formalised SMP. Prepare a report on how parts of the existing CIM Plans might best be translated (if at all).
2. Identify elements common to all CIM Plans that might benefit from being captured in a generic or national coastal SMP addressing Good Practice in Coastal Management. What we have in mind here are basic parameters such as those listed below:
 - natural hazard buffer and coastal habitat protection
 - avoidance of new development in Coastal Hazard Zones
 - safe location policy and design guidance for life line infrastructure, key community buildings and emergency shelters
 - standards for the location of houses with respect to roads, streams, the coast etc.
 - simple environmental standards and other practical initiatives to enhance local sustainability.
3. Investigate and make recommendations on an appropriate process to consult Districts on whether and how some of their desired local CIM Plan outcomes might be introduced to the SMP Plan preparation process.
4. Pilot the SMP consultation process with one District to test the reactions and response.
5. Agree a way forward for the existing CIM Plans and review scope of work and contract accordingly.

For new CIM Plans

1. Include an overview and discussion of the PUM Act and SMP process in the village consultations and gauge understanding and acceptance or otherwise of the new process.
2. Identify as part of the Plan preparation process matters that should or should not be captured by a local SMP.
3. Consult on the appropriateness of formalising some of the CIM Plan recommendations.
4. Draft the CIM Plan with a section on matters that could possibly be progressed through either a generic or local SMP and seek specific feedback.
5. Review the draft in light of consultation.
6. If appropriate (but do not make it mandatory) include a section in the completed and signed off CIM Plan on matters that will be progressed through either a generic or local SMP.

Finally, as a general observation we would see the greater detail referenced in S32 of the PUMA Act (Development Standards) as being more appropriate to urban development such as the main centres of Apia and Salelonga. Whilst in due course it may be necessary to move towards more detailed standards for the whole country, in our view a simpler approach may be an appropriate first step encouraging better

rural and village development through a more generic good practice guide as discussed earlier. This would allow more resources to be focused upon the development of management plans for the urban area and recognises the critical need for local partnership and engagement (rather than regulation) at a rural and village level.

3.3 Option Four

In a subsequent discussion with MNREM and PUMA representatives during the early August 2005 WB supervision mission a fourth option was discussed. This option would be for the trialing of the conversion process in two districts or part districts. The first would be one of the 15 districts for which CIM Plans have been completed under Stage 1. The second would be a trial SMP to be developed by PUMA with assistance from a UNDP funded consultancy.

For the CIM Plans already completed, the consultants would produce a review of the plan with recommended changes/additions to meet the requirements of the PUM Act and report on the recommended next steps to PUMA. For the new SMP to be drafted, the Consultants would offer a review role based on the experience of the formulation of the CIM Plans to date. Upon completion of these two trial SMP's, a formal review workshop will be arranged to discuss and agree on a course of action for the remaining CIM Plans. In the meantime, in accordance with the requirements of the Contract, the project team (Consultants and Ministry staff) continue with the preparation of CIM Plans for the remaining districts with notification to the participating villages that these plans may be the first step in the preparation of a SMP under the PUM Act.

4. Conclusion

In our view whilst there are no legal/technical reasons why the existing and future CIM Plans cannot be converted into SMP's, there are a number of reasons why we would not recommend that this be done at this time. These are:

- A philosophical position that wishes to retain the strong partnership ethic that underpins the basic CIM Plan concept. We see this as having particular application within fa'a Samoa and fa'a Matai
- There are alternative mechanisms within the PUM Act which may initially be more appropriate to managing rural development in Samoa
- The scale of environmental issues to be addressed does not warrant the application of a rigorous statutory framework at this stage.
- The resource implications for PUMA and the community are significant.
- A staged/phased approach to the implementations of a statutory land use planning and regulatory framework for Samoa may be more appropriate with a focus on development control and land use planning in the urban area before considering rural issues in detail.

We would therefore recommend a cautious approach with either Option Three or Option Four as set out in this paper be adopted.

Appendix 1

*CIM Plans and SMP
Requirements under the
PUM Act 2004*

CIM PLANS AND SMP REQUIREMENTS UNDER THE PUMA ACT 2004

PUMA Act Requirement	Implication for CIM Plan	Comment
Section 9 (b)(i) – Function of PUM Board is to facilitate the preparation and approval of sustainable management plans	Board must authorise: <ul style="list-style-type: none"> - preparation of SMP or conversion of all or part of CIM Plan to SMP - approval of finalised SMP 	Substantial workload here for Board (reviewing and approving conversion of 15 existing CIM Plans and 28 new Plans) together with raft of other work (development approvals and other SMP's such as urban Apia). Can compare this to small Council's in NZ who would not attempt to process one District Plan in a year with other workload demands and pressures.
Section 9 (d) – PUM Board can appoint special planning committee to advise on SMPs	Special planning committee could be established specifically to process CIM Plan conversions	May help to ease workload burden for PUM Board, but requires a Committee with sufficient expertise and experience.
Section 11 – PUM Board may delegate duties to committees, officers or employees	Delegations could be established specifically to process CIM Plan conversions	Heavily resource and expertise dependant, especially for PUMA.
Section 12 – SMPs may be prepared at national, regional, district, village or site specific level	CIM Plans or parts of CIM Plans can form either part of an SMP or a full SMP. For example a 'Coastal SMP' is possible and need not be limited to district boundaries	<ul style="list-style-type: none"> - Consider amalgamating CIM Plans into a Coastal SMP. - A District SMP will need to cover a much wider area and range of issues than a CIM Plan which is restricted to coastal environs.
Section 15 – Contents of SMPS – may contain a diverse range of policies, methods, regulations and rules. 15(i) allows a SMP to adopt or	CIM Plans could form all or part of an SMP. However SMP can have wider content and scope than CIM Plans.	There is no existing precedent for an SMP. The conversion of CIM Plans is therefore something of a trial for SMP process. CIM Plans are largely advocacy and partnering documents, not regulatory

PUMA Act Requirement	Implication for CIM Plan	Comment
incorporate any document which relates to use, development or protection of land		instruments. Existing CIM Plans have been prepared in good faith with no expectation of associated regulation. Community engagement in CIM Plans has been successful because it is seen as a positive rather than negative or regulatory process.
Section 16 – a Special Planning Committee can be appointed for SMPs	Workload would demand a Special Planning Committee	Heavy sustained workload likely. Requires experience and expertise and funding for Committee attendance and costs
Section 17 – Public notification and affected landowner notification must be given of intention to prepare plan.	Existing 15 CIM Plans do not comply. Would need to notify intention to convert plans whether in full or in part. All new CIM Plans would need to be prepared in a more formal manner than has occurred previously with public notification	Heavy workload for PUMA staff who must prepare public notices and landowner notification schedules. Complications with customary land? Significant timeline implications based on experience with statutory process elsewhere.
Section 18 – Consultation is mandatory for preparation of an SMP	Existing consultation process for CIM Plans will satisfy Act requirements	Need to maintain a positive enabling consultation framework. Concerns about being 'regulated' may arise if process formalised.
Section 20 – Public notification of draft SMP	Existing 15 CIM Plans do not comply. Would need to notify intention to convert plans whether in full or in part. All new CIM Plans would need to be prepared in a more formal manner than has occurred previously with public notification	Heavy workload for PUMA staff who must prepare public notices and landowner notification schedules.
Section 21 – Any stakeholder may make written submissions. PUMA to try	Formal process needed for both existing and new CIM Plans	Very heavy workload for PUMA staff and consultant team in consultation attempting

PUMA Act Requirement	Implication for CIM Plan	Comment
to reach "consensus" with submitters on content of draft SMP		to reach consensus and in processing submissions.
Section 22 PUMA makes recommendation to PUM Board on SMP (adopt, modify or reject)	Formal reports and recommendations needed to accompany all SMPs/CIM Plans	Very heavy workload for PUMA staff. Recommendations only to be made after "all reasonable attempts" made to reach consensus. This is a demanding and time consuming challenge
Section 23 PUM Board makes decision on SMP.	CIM Plan status must change from a non statutory record of national-local partnership to become a statutory document that cannot change without formal process. SMP does not have effect if appealed.	Large workload for PUM Board. Moves focus of CIM Plans from a positive enabling policy instrument prepared locally to being a statutory instrument of government.
Section 24 – Public Notification of PUM Board decision and call for appeals.	SMPs and hence CIM Plans subject to appeal.	Appeal process can seriously undermine local partnership and status of local decision making. Consider with regard to spirit of Fa'a Samoa and Fa'a Matai
Section 25 – Planning Tribunal hears appeals and issues decision	CIM Plans can ultimately be decided (amended, rejected or accepted) by an independent quasi- judicial body.	Appeal process can seriously undermine local partnership and status of local decision making. Consider with regard to spirit of Fa'a Samoa and Fa'a Matai
Section 27 – Hierarchy of Plans specified (national, regional, district, village).	CIM Plans sit at District and village level. CIM Strategy has a national context but no statutory authority.	Consider development of a National Coastal Sustainable Management Plan in preference to district or village plans given difficulties and challenges identified above.
Section 28 – Amendments to plans requires full statutory process unless very minor change	Any future amendment to a CIM Plan requires full process.	Impacts flexibility and adaptability of Plans. Creates large workload for PUMA and PUM Board handling requests for changes.
Section 32 – Development Standards	Can be prepared at any of national,	A set of national standards for improving

PUMA Act Requirement	Implication for CIM Plan	Comment
can be prepared for numerous matters	regional, district or village level. CIM Plans could contain development and land use rules.	sustainable coastal management may have merit and could form part of a National Coastal SMP. The drafting of district or village rules should only be contemplated in close consultation with local villages during CIM Plan consultation otherwise positive engagement will be undermined. Note that many villages already have their own set of rules for land use, protection and development. A more comprehensive set of rules may only be necessary for the Apia urban area.
Section 33 – Samoa Planning Provisions can be prepared	Can capture SMP content but may also override a CIM Plan.	A set of national provisions for improving sustainable coastal management may have merit and could form part of a National Coastal SMP.
Sections 34 – 36 allows an SMP to specify activities that are permitted, require consent or prohibited	CIM Plans could list activities however this is a clear move away from a non statutory to statutory framework.	A National Coastal SMP may better address permitted and prohibited activities (those with significant potential impacts), rather than attempting to regulate locally.
Section 64 – Gives a right to landowner compensation if impacted by SMP (e.g. land reserved for public purpose)	CIM Plans illustrate a wide range of future public uses, however their acquisition or need for public purposes may be many years off as the CIM Plan is only a picture of a preferred future.	This may have major financial implications if landowners seek compensation for land earmarked for future public use. Funding may not be available to compensate in the short term.
Section 100 – Act binds all public authorities but otherwise does not bind	Public works and other public policies and projects identified in CIM Plans may be	Reduces flexibility. Any change requires full statutory process. May make public

PUMA Act Requirement	Implication for CIM Plan	Comment
the Government.	binding once converted to SMPs	authorities reluctant to sign up to a CIM Plan.

Appendix 2

*Suggested Way Forward
for SMPs*

Suggested Way Forward for SMPs

The following commentary builds on the discussion contained in the draft Inception Report (Task NRM 2.1, page 14), and proposes a suggested way forward to resolve the potential for conflict between the objectives of the CIMS and CIM Plan process and those of the PUMA Act 2004.

1: Develop a “National Coastal Sustainable Management Plan” (NCSMP)

Commentary:

A National Coastal SMP would pick up many of the policy themes already contained in CIMS but give them more statutory weight. The NCSMP could build on established best practice around the Pacific and is likely to contain Objectives and Policies for sustainable coastal management on a range of issues common to most districts and villages including natural hazard buffer and coastal habitat protection; integrated catchment management; avoidance of new development in Coastal Hazard Zones; safe location policy and design guidance for life line infrastructure, key community buildings and emergency shelters; standards for the location of houses with respect to roads, streams, the coast etc. CIMS has already helped guide these matters at the District level and these are reflected in CIM Plans prepared to date.

The NCSMP may also go as far as to include a list of activities, developments and land uses that require special control and management or should be prohibited in all areas. These may form Development Standards or Planning Provisions as discussed below.

Preparation of the NCSMP can proceed quite quickly relying largely upon existing information. A round of stakeholder consultation should take place prior to a Draft NCSMP entering the statutory process.

2: Consider drafting Development Standards and Samoa Planning Provisions of particular relevance to coastal management

Commentary:

As either part of or separately from the NCSMP, we recommend that PUMA give consideration to drafting a set of national Development Standards and/or Planning Provisions for coastal management. These may be a series of generic rules supporting the policy directions of CIMS and the NCSMP.

Whilst this work could occur separately to the NCSMP there is a real advantage from a statutory process perspective (notification, submissions, hearings, appeals) in the two tasks being integrated?

3: Do not attempt to convert existing 15 CIM Plans to SMPs in the near future, instead identify common elements that can be captured in NCSMP.

Commentary:

Given the complexities of the PUMA Act statutory processes (refer table entitled " CIM Plans and SMP Requirements under the PUMA Act 2004"), we do not recommend that an attempt be made at this stage to retro-fit existing CIM Plans so that they can enter the statutory process as village or district SMPs. We envisage substantial barriers to achieving a transition and philosophically we also favour leaving the CIM Plan process as an enabling, positive non statutory framework for promoting national and local integration.

There will be many elements common to the existing CIM Plans that have national relevance. These should be identified and captured for consideration as part of drafting the NCSMP (in the manner described above).

4. Retain integrity of CIM Plan process as a non statutory national-village partnership (i.e. don't attempt to change CIM Plan process to SMP process).

Commentary:

Our reservations with the relationship between the CIM Plan process and SMP process stem mainly from a philosophical stand point. We also note however that there are currently no SMPs in draft or finalised so the process to convert CIM Plans might well be the country's first attempt and a bad experience now could impact on wider application of the SMP model later.

It has always been the intention (and we believe is now a widely accepted principle) that the CIM Plan is a non statutory instrument something akin to a 'charter' registering a partnership between government, villages and other key stakeholders to improve community and infrastructural resilience to coastal hazards.

The engagement process with communities has been very effective because of this philosophical stance. We wish to retain such a positive focus for the next 28 plans.

5. As part of the current round of CIM Plans consult villages and stakeholders on move towards NCSMP and whether there are (in addition) any locally specific issues that might warrant priority attention via a district or village coastal SMP.

Commentary:

Following sign off of new CIM Plans by the community, government and stakeholders the potential exists (as a subsequent future exercise) to take some elements of the CIM Plan through to the statutory process via a village or district SMP.

By way of example, if a village is especially concerned about sand mining by mechanical diggers, it may want to add extra weight to its adopted CIM Plan by drafting and notifying a Draft SMP either specific to that issue or specific to a particular location or geographic feature.

The option to pursue an SMP should not be precluded and can be discussed as part of the consultation to finalise the CIM Plan. However we believe it is critical that the formal statutory processes necessary for an SMP occur independently and after sign off of the CIM Plan.

Appendix 3
Resource Analysis

Resource Analysis

Assumptions to get draft plans notified

- 48 districts
- Time to draft plan = 8 person weeks / plan
- Initial consultation per district = 200 persons at 1 hour each
- Number of written submissions per district = 100
- Number of meetings to resolve submissions = 50
- Time per meeting to resolve submissions = 4 hours

Therefore, to prepare 1 draft plan = 8 person weeks.

- Initial consultation = 200 person hours = 5 person weeks
- Meetings to resolve submissions = $50 \times 4 = 200$ person hours = 5 person weeks
- Assume 2 person weeks to draft amendments to plan following submissions

Therefore, to get each district to draft plan stage = 20 person weeks or 5 person months.

Therefore, for 48 districts = $48 \times 5 = 240$ person months
= 22.8 person years

Current PUMA Team = 5 persons = $240/5 = 48$ months

Or, 4 years to complete all plans, assuming 5 persons full-time on plan formulation and processing.