



Implications of the South Saskatchewan Regional Plan

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The Environmental Law Centre (ELC) is a charity founded in 1982 to provide Albertans with an objective source of information and environment and natural resource law. The ELC's current mission is to ensure that laws, policies and legal processes protect the environment. Its services include public education and reform analysis on environmental law and policy topics.

- **Evaluating the South Saskatchewan Regional Plan (SSRP)**

The SSRP is a complex document whose practical effect depends on future action during the "implementation phase". Given the numerous interests at stake in this planning exercise, the fairest evaluation of the SSRP is not whether it meets the interests of the ELC, the watershed community or any stakeholder, but whether it advances the Alberta Land Use Framework. This warrants reviewing the intentions of the Land Use Framework, the creation of the *Alberta Land Stewardship Act*, and the process through which the SSRP was developed. It also requires a case study on how the SSRP deals with the specific issues identified by the Land Use Framework. The example which came to dominate the public consultations is recreational use of public land. How the SSRP deals with this issue is of particular interest to the watershed community and it exposes needs for further reforms on which the ELC is working.

- **What Was the Point of the Land Use Framework?**

The Land Use Framework is a provincial policy created in 2008 after public consultations revealed widespread support for greater provincial leadership on land use issues. In many ways it follows the footsteps of non-government work, especially in Southern Alberta. The official document recognizes that growth in Alberta is causing competition for land, conflict between users, and is stressing the finite capacity of land, air, water and habitat. It states that the "old rules" will cease to provide the quality of life that we expect and makes specific reference to uncoordinated decision-making. The Land Use Framework claims to follow a tradition of provincial guidance on land use beginning with the creation of the White and Green Areas followed by the Eastern Slopes Policy. It identifies remaining policy gaps concerning: the coordination of subsurface minerals and surface activity, agricultural land fragmentation, flood risk management, the under-representation of ecoregions in the protected area

system, and recreational use of public land. It proposes new strategies including: efficient land use to reduce the human footprint, cumulative effects management, regional plans that require all decision makers to comply, and new conservation tools for public and private land.

What the Land Use Framework means in practice is unclear. The document is basically an unenforceable policy about making future policies. The regions it creates are based roughly on river basins and municipalities but do not line up exactly with either of these existing boundaries. Its wording is open to conflicting interpretations of whether “hard choices” are required or whether Albertans can still “have it all” simply by managing it all better. The one certainty of the Land Use Framework might be the challenge of showing leadership on land use in Alberta.

- **What Does the *Alberta Land Stewardship Act* Do?**

The *Alberta Land Stewardship Act* (ALSA) is the key piece of legislation for implementing the Land Use Framework. Like the Land Use Framework, ALSA creates uncertainty because its primary function is to enable future action. ALSA is complicated, but grappling with how it could work is critical to evaluating the SSRP because some expectations exceeded what was possible while in other cases the possible was not done.

ALSA covers two key topics: regional planning and conservation tools. The planning part only requires that regional plans include a vision and at least one objective. All other elements are discretionary. The most unique feature of regional plans is that they can have the legal weight of a “super regulation”: they can trump other regulations, regulatory decisions, statutory “consents” (leases, licenses, permits and approvals), municipal plans and bylaws. However, regional plans cannot trump statutes (primary legislation) made by the legislature, nor can they expropriate land titles other than through existing legislated process. The implication is that regional plans cannot alter the fundamental mandates of municipal and provincial decision makers, their powers over property rights largely resemble those that already existed, and they are not going to re-invent the land use industries. What regional plans could do is direct multiple municipal and provincial decisions-makers to comply, authorize the use of existing powers to implement plans, set limits on cumulative effects, and alter industry practices. There are also practical considerations of what plans are most likely to do. Much like municipal planning, it is foreseeable that regional plans would set high level objectives and defer the structuring of the development footprint and zoning of uses to subsequent steps. If plans do have legal weight, they are far more likely to bind decision makers than to directly regulate land users. Nonetheless, regional plans could be very different than the “old rules”. For example regional plans could prioritize uses or tackle the intensity of use rather than simply allowing or prohibiting uses.

The planning aspect of ALSA also allocates powers and participation rights. Planning power belongs to Cabinet. ALSA requires a public consultation on plan development but with no further specifics. Once

plans are made, directly affected persons may seek review, land title holders may seek variances, and persons legally entitled to compensation may seek the same. However, persons concerned about others not complying with regional plans must file a complaint with Stewardship Commissioner who alone may seek enforcement of regional plans. Regional plans must be reviewed after five years and are subject to renewal after ten years.

The second key topic of *ALSA* is a suite of conservation and stewardship tools. These include Conservation Easements, Conservation Directives, Conservation Offset Programs, Transfer of Development Credits and development of Market Based Instruments. Some of these tools would restrict land use while others would provide incentives for voluntary action. Most of the tools need not be related to regional planning but all are available to implement regional plans. The one exception is Conservation Directives. This new form of provincial zoning can only be created through regional plans. If created then land title holders can seek compensation, which is also new to Alberta as there is typically no compensation for regulatory impacts on land value.

Completing regional plans has taken priority over promoting use of the conservation tools and this has had significant implications for the SSRP. The first is that the planning part of *ALSA* attracted significant criticism. The planning part centralizes power, provides broad discretion, lacks environmental principles, limits public participation, and provides minimal accountability for outcomes. Reforms to *ALSA* provided more process for property rights holders but did not fix these broader problems. Concern with centralized planning and property rights applied to much provincial legislation beyond *ALSA*, and this larger debate drew attention away from the fact that the novel features of *ALSA* include compensation and incentive opportunities. Overall there may be a lasting chill on the Land Use Framework as a result of larger grievances. The second implication of a focus on planning over the new tools is that, regardless of what the SSRP says, implementation will be very difficult.

- **What Did the SSRP Process Foresee?**

SSRP was certain to provide the hardest planning exercise under the Land Use Framework. The Regional Profile described an extremely diverse region with numerous industries and much private land; a dry region dependent on water from the Eastern Slopes.

The SSRP was destined to be a huge but high level document as the Terms of Reference were very broad. The Regional Advisory Council (RAC) was asked to provide advice on long-term development and “trade-offs” to reconcile economic, environmental and social priorities. The RAC Advice articulated few established planning principles but it showed general propensity to accommodate land uses. The RAC did provide clear advice on multiple policy gaps identified in the Land Use Framework. For example it found filling in floodplains to be inappropriate and it proposed banning destructive recreation from public land. The RAC Advice on conservation was fairly visionary compared to existing policies as it

mapped numerous “conservation management areas” connected throughout the region outside of the parks and protected areas. This concept was replaced in the government-produced Draft SSRP by discrete “conservation areas”, all on public land, and mostly in the Green Area. However, the RAC’s concept made a partial re-appearance in the final SSRP as discussed below.

The Terms of Reference also set the stage for implementation challenges because the RAC was not allowed to provide public advice on existing laws or legal changes that would be required. The closest the RAC advice comes to recommending implementation tools is vague references to “best practices” and avoiding commitment to specific tools, such as stating the Castle need not necessarily be a park.

There were issues with public participation in the SSRP process which is no surprise given the weakness of ALSA on this matter. The Terms of Reference were developed without public consultation. There was a lack of clarity around whether the RAC members represented constituencies and how to get information into the RAC. Consultations attempted to cover the entire SSRP with audiences whose understanding of the Land Use Framework varied immensely. Government staff showed desire for input and were receptive to meeting with stakeholder groups on request, but there was no formal access to decision makers and many participants felt that informal lobbying prevailed. These procedural deficiencies promoted positioning on old disputes rather than visioning what ALSA could do differently. For example, the debate about whether the Castle should be a Park or a Public Land Use Zone is really a debate over which of the “old rules” one prefers.

The SSRP process was further interrupted by a provincial election between the RAC Advice and the Draft SSRP in which the government lost seats in the region. The new Cabinet was mandated to complete regional plans but its commitment to the Land Use Framework may have waned as the priority shifted to creation of a Single Energy Regulator.

- **What Does The Final SSRP Say?**

The Final SSRP mostly provides more detail on the Draft SSRP. The Strategic Plan provides slightly more pointed discussion of the issues identified by the Land Use Framework, for example encouraging municipalities to avoid agricultural land fragmentation and development in flood plains. It also discusses conservation and stewardship in high level terms. Concerning private land, it makes mention of ecosystem services, encourages use of the new tools and endorses an offset pilot in the eastern grasslands. Concerning public land, the SSRP provides that it replaces the Eastern Slopes Policy, but it also provides that existing Integrated Resource Management Plans made under that policy will remain in place until reviewed. The SSRP affirms that headwaters protection is the highest priority followed by other values including biodiversity and forest ecosystem resiliency.

The Implementation Plan provides regional objectives and indicators of which the most concrete are conventional economic indicators like GDP and production in the resource industries. Some social indicators resemble conventional economic indicators, for example housing starts. The environmental objectives are the least measurable and some are lacking as they are to be provided by an unfinished Biodiversity Framework (see below).

The Implementation Plan expressly relies on pre-ALSA legislation and decision-making powers. Private land development will be regulated by municipalities. For use in this sector there is a “compendium” of tools for efficient land use which is not part of the SSRP but was released alongside it. On public land, the new conservation areas will be implemented using parks and protected areas, except for the Castle which is partitioned into park and Public Land Use Zone. For the general Green Area, the Implementation Plan affirms existing principles of sustainable forest management but does not elaborate on what these principles are. The Final SSRP also identifies two areas of public land for uncertain conservation measures. One is a proposed connectivity area between the new Pekisko Heritage Rangeland and the parks of Kananaskis Country. The second is southern grasslands for which further consultations would be held on the appropriate conservation tools. Both examples were absent in the Draft SSRP and more closely resemble the RAC Advice.

The Implementation Plan includes cumulative effects management frameworks for air and water but not for land or biodiversity. The unfinished biodiversity framework would include a linear management framework. This linear framework may unfold earlier in the Porcupine Hills, Livingstone range, and further Green Area watersheds facing off highway vehicle pressures and a legacy of land disturbance.

The Regulatory Details part of the SSRP mostly provides ministerial responsibilities for conservation areas and discretion in cumulative effect management decisions. It includes nothing requiring decision-makers to comply or that would alter existing statutory instruments.

- **Comments on the Final SSRP**

The extent to which the SSRP advances the Land use Framework is a question of expectations going into the process. The SSRP is a modest first step in several regards. Southern Alberta now has a statutory plan that includes environmental outcomes, seeks to manage cumulative effects on air and water, intends to tackle linear disturbance and moves recreation management up the agenda. The SSRP would build on the Eastern Slopes policy by creating legislated protection for mountain headwaters and it would help address the underrepresentation of grasslands in the protected area system through a new Heritage Rangeland and potential for more. All of these steps are in keeping with the Land Use Framework, so if one recalls how regional plans are intended to be reviewed and renewed then this first SSRP provides much to build on.

The SSRP has two types of failings. The first type flows from the vagueness of the Land Use Framework and the broad discretion provided by *ALSA*. Provincial leadership on land use has taken the “have it all” view over the “hard choices” view. The SSRP shows little adherence to principles, especially environmental principles, and it was clearly created with little concern about accountability for outcomes. In situations where there is conflict or competition for land it defers decisions to future planning exercises or avoids them altogether. The SSRP does not fill several policy gaps identified by the Land Use Framework that are especially acute in Southern Alberta. It offers no incentive or prohibition that would actually prevent agricultural land fragmentation. It provides no binding direction on flood risk management even though the devastating floods of 2013 occurred between the Draft SSRP and the final version. The most notable absence is lack of coordination of minerals and surface activity. The only notable provision concerns notifications on mineral leases in conservation areas. There are no provisions to address serious issues in the region such as drilling in urban areas and disturbance of native grasslands. In most cases the Alberta Energy Regulator will receive no clear direction from the SSRP on the exercise of its new authority over environmental permitting and surface access. By way of silence the SSRP makes energy development the land use most apt to be anywhere anytime.

The SSRP takes some better strides towards filling policy gaps on public land. The new protected areas, thought unsatisfactory to some, were not a foregone result of the Land Use Framework given the original focus on new tools. The policy gap around recreational use of public land is discussed at length below.

The second type of failing of the SSRP is with not using *ALSA* where needed. References to new strategies, rules, or tools are in the Strategic Plan lacking legal weight. The plan deliberately avoids private land and the weak guidance to municipalities is problematic in multiple regards. As this guidance is expressly non-binding it can definitely be ignored without consequence, yet municipalities wishing to pursue environmental objectives may find little assurance of backup from the SSRP. While public land receives attention in the Implementation Plan, this part is also non-binding and makes no use of *ALSA*. For example, reference to sustainable forestry principles has no weight over regulations and consents that allow high-impact operations.

The SSRP simply includes nothing that only *ALSA* can do. It sets no limits on any impacts on land, air, water or biodiversity, provides little to coordinate decision-making, nothing with which decisions makers must comply, nothing to prevail over existing statutory instruments, and minimal guidance for use of the new Conservation Tools. It is business as usual in the land use sectors.

The new rules must come into play before the SSRP can be said to advance the Land Use Framework in any substantive way. This will require significantly more planning work at the “implementation stage” and it will require that non-government parties continue to lead on building support for new conservation tools. Some challenges are beyond what the SSRP can surmount in any event and further reforms may be needed, an issue discussed below with respect to recreation.

- **Recreation Management in the SSRP:**

Recreational use of public land provides a great example of what the SSRP can and cannot do towards filling the gaps identified by the Land Use Framework. Recreation was the hot topic at the public consultations and accordingly the Final SSRP includes much content that was absent in the Draft SSRP.

What does the SSRP say?: Unlike the Land Use Framework, the SSRP Strategic Plan does not treat recreational use of public land as its own topic. Instead it frames recreation as one of multiple land uses and includes it in a discussion of the tourism industry, citing economic activity associated with motorized recreation.

In contrast, the Implementation Plan gives significant attention to recreation as its own topic. It begins by stating a dual intention of providing recreation opportunities while preserving “natural heritage”. The indicators by which success will be measured include parks per capita and recreational infrastructure. The Implementation Plan varies from the Draft SSRP in multiples ways. One is that it endorses principles of recreation management called the “5 E’s” (“engineering, education, evaluation, enforcement, experience”) and those principles advanced by the National Off Highway Vehicle Conservation Council (which it does not elaborate on). It also states the need to explore legislative options to address the liability risks associated with trail management. This attention to liability was moved into the Implementation Plan from an Appendix on the Regional Trail System where it existed in the Draft SSRP.

The Implementation Plan cites two future planning exercises relevant to recreational land use. The first is proposed “recreation management planning” for much of the Green Area. The priority areas for this exercise are the Porcupine Hills in 2015 and the Livingstone range in 2016. Other areas will be planned “as soon as practicable”. Where Access Management Plans exist such as the Ghost and the Castle, these will remain in place until reviewed. The second exercise is the aforementioned Linear Framework. The Linear Framework is semantically separate from recreation planning but it could assist as it prioritizes the same geographic locations and cites concern with OHV pressure.

As for how the users will be regulated, this is a case of expressed reliance on existing rules and tools. The three options are: (1) parks and protected area legislation, (2) Public Land Use Zones and Public Land Recreation Areas under the *Public Lands Administration Regulation* (the “*Regulation*”) under the *Public Lands Act*, and (3) the general provisions of the *Regulation* for other Green Area land. All of the proposed Conservation Areas will be implemented through parks and protected areas except for the Castle, which will be partly a park and partly a Public Land Use Zone. Existing Public Land Use Zones will continue, and the SSRP proposes the first use of the Public Land Recreation Area tool. This tool would convert some existing random camping areas to designated un-serviced camping areas with gravel pads and fire rings.

The SSRP elaborates on how this slate of options affects the regulation of OHVs in Appendix K. This Appendix provides detail that was lacking in the Draft SSRP but it does not alter the existing regulatory approach. In new Conservation Areas, OHVs will be restricted to existing trails and may not make new routes without Access Management Plans or regulations. In Public Land Use Zones, OHVs are restricted to designated trails and areas. On vacant Green Area land the general provisions of the *Regulation* apply: OHV use is generally allowed except for a prohibition on motorized vehicles in permanent water bodies without permission. A paragraph at the bottom of the new Appendix notes the existence of non-motorized recreation.

As noted above, a second Appendix endorses future creation of a Regional Trail System. Two notable proposals in this Appendix include altering industrial reclamation standards where roads would make suitable trails and attempting to increase enforcement capabilities.

Comments on Recreation in the SSRP: The SSRP definitely targets the policy gap around recreational use of public land, but it does not completely fill that gap and likely could not in any event.

The Land Use Framework was fairly balanced in calling for a recreation strategy that would provide recreational opportunities while addressing environmental impacts, user conflict and safety issues. It also did not prioritize OHV use over other forms of recreation. The SSRP Strategic Plan is less balanced. It appears that the cart of provincial tourism economics is driving the horse of regional recreation management even though the Tourism Framework is a latecomer compared to the Land Use Framework. Even if one accepts this strategic divergence, the economic analysis is lacking as it does not weight the value of recreation against other industries, the value of non-motorized recreation against motorized recreation, or recognize that many of the benefits accrue in urban areas while the costs are born in rural areas. Respecting environmental impacts, the SSRP seems to assume that recreation and conservation are inherently compatible, an assumption that was not present in the Eastern Slopes Policy. Respecting user conflict and safety, the SSRP does not alter the existing “overlapping” use approach but it does suggest that recreation must cede to the primary industries.

The Implementation Plan provides measurable indicators for recreational opportunity creation but not for impact reduction. The latter would have been easy to imagine, such as a reduction in accidents or litter or an increase in enforcement action. However, even the focus on recreational opportunities may be difficult to deliver on due to the SSRP’s reliance on the old rules for implementation.

Why the “old rules” don’t work: The existing rules for recreational use of public land upon which the SSRP relies are part of the problem. These rules create legal barriers to a “trade off” whereby there would be greater development of a trail and camp system in exchange for closure and reclamation of unsuitable tracks and areas. This deficiency applies to the access planning regime and the regulation of the users.

The resource plans that will stay in place under the SSRP were made without thought to recreational end use of the industrial footprint. Subsequent Access Management Plans were reactive in nature and mostly “designate” trails from a footprint that was not created for sustained use or to provide a quality recreational experience. This process is likely better than nothing but it has been dissatisfactory to many. Enforcement is challenging and there are difficulties maintaining functional stewardship groups.

Access Management Plans have no regulatory weight so they must be implemented through the *Public Lands Act*. The *Public Lands Act* is sufficiently outdated that it does not provide public land managers with a clear mandate to develop recreational infrastructure or to pursue environmental conservation. As of 2011 the *Regulation* has provided a large kit of recreation management tools but it cannot overcome the deficiencies in its parent legislation so it still counts as the “old rules”. The *Regulation* creates an access baseline of “open unless closed”. Random use is the default state which means that any management action can be perceived as a restriction. In fact most actions available to departmental staff are blunt closures. Actions that could provide recreational infrastructure require political decisions. This includes the creation of Public Land Use Zones, Public Land Recreation Areas, Public Land Recreation Trails, and the charging of user fees. Only Public Land Use Zones have been used prior to the SSRP. These zones can designate trails and areas, segregate users. However they do not provide clear direction to engineer trails, mark non-designated trails as closed, or reclaim unsuitable tracks.

What the SSRP can do: The SSRP can provide guidance for use of existing tools - and it did to a limited extent. The creation of Public Land Recreation Areas is due and these areas are not required to be small or limited to gravel pads and fire rights as proposed by the SSRP. Theoretically they could provide other amenities like sanitation and waste disposal. Other tools available under the *Regulation* are absent from the SSRP: It is silent on Public Land Recreation Trails, fees, or statutory consents other than mentioning the tourism industry’s need for secure tenures. The SSRP definitely does not promote use of the *Regulation* to its full potential, but what guidance is provided still has value because the lack of recreation mandate in the *Public Lands Act* and the need for political decisions to deploy the recreation management tools means that they might otherwise never get used.

What the SSRP has not done but could still do is re-vision access management planning. As noted, the SSRP proposes two types of future planning exercises: Recreation Management Plans and the Linear Framework. Either measure could help bring order to the multiple use landscape.

How a “Recreation Management Plan” would differ from the past “Access Management Plans” other than in name is not clear. Concerning opportunities, the SSRP does not surmount the lack of a clear legislated mandate to develop trails and camps rather than simply granting access and designating trails from the existing footprint. Concerning impact reduction, even if the words “access management” have been abandoned these plans still need to identify places where recreational users should not go or they will be no different from the baseline and the exercise will be almost pointless. For Recreation

Management Planning to succeed there is need for clarity on what decisions remain to be made, who the decision-makers are, what the process will be and which stakeholders should be involved. Some answers may come through a Recreation Planning Handbook that is currently under development.

The second opportunity to re-imagine access management is through the Linear Framework. Tackling the cumulative effect of land disturbance is perhaps the most significant step needed to advance the Land Use Framework and the opportunity to do so is still open.

The ELC has multiple recommendations with respect to this exercise:

1. Set limits on linear disturbance. This should have regulatory weight through the SSRP and require that multiple industry regulators comply.
2. Merge the Linear Framework with the Recreation Planning. These two initiatives appear separate on the face of the SSRP but as they prioritize the same locations it makes sense for them to proceed together. The ELC recommends moving the prospect of recreational end use to the front end of the industrial planning, development, and reclamation cycle. The SSRP would then direct industry regulators to make decisions that “help not hurt” the recreation management challenge. This could involve building roads intended to become trails, fully removing roads where this outcome is undesirable or not creating them in such locations at all. Actions should not be limited to simply leaving roads unreclaimed as proposed by the SSRP.

There are some technicalities to be overcome to merge these initiatives. Recreation planning is intended for specific Green Area locations but the Linear Framework is to cover both White and Green Areas. While recreation planning serves multiple ends, the Linear Framework is under a Biodiversity Framework. Consequently the triggers for management action on linear disturbance will relate to biodiversity not necessarily other negative impacts of recreational use of the industrial footprint, such as water quality impacts or user conflict. Even respecting biodiversity, it is not clear whether management action would be triggered by scientific criteria or social acceptability of impacts. There should also be management actions when linear limits are met that account for the realities of recreation management. Simply closing roads to recreational use so as to reduce the incidental impacts of industrial access creation is unpopular and hard to enforce. Conventional “Integrated Land Management” (reducing the collective footprint of multiple industry operators) should be required where the need is to mitigate industrial impacts on biodiversity, but this might not help with recreation management if the resulting footprint does not meet the demand for recreational opportunities.

3. Include recreation users in simple offset schemes. Recreational users should have to reclaim unsuitable tracks in exchange for developing trails. This would promote stewardship as intended by the Land Use Framework and it would fill a gap in the reclamation system where no industry

operators are responsible for the legacy features. The Linear Framework's focus is on industrial disturbance so it would be necessary to see that trails and tracks are included or provided their own program.

4. Provide opportunities for input into the Terms of Reference for the Linear Framework. These terms should address the above questions concerning the scope and potential regulatory impact of the framework.

As a final note on what the SSRP did not do but should in the future, it did not consider use of the *ALSA* Conservation Tools for recreation management purposes. While the original vision may have been for these tools to be used by landowners and industry, *ALSA* is drafted broadly enough that several tools are available for public land management. For example, using a Conservation Directive on public land would allow the new tool to be tested while avoiding the provincial regulation of private land or the need to compensate title holders. A Conservation Directive could help rectify the problem with the *Public Lands Act* providing no conservation mandate by providing direction to the land manager. Conservation Directives could be used to increase the legitimacy of Public Land Use Zones for conservation areas, they could be used to break stalemates between parks and public land designations, or they could provide interim protection to undesignated areas of public land. Potential locations could be the areas identified in the SSRP for connectivity or future consultation on the appropriate tool.

What the SSRP cannot do: The SSRP cannot completely fill the gap in policy around recreational use of public land. This is apparent from the relegation of the proposed Regional Trail System to the future and the needs identified by that Appendix around enforcement capacity and liability protections.

- Whose job is it to provide recreational infrastructure and services on public land outside the parks system?
- Where will the money come from when little revenue is generated from users and what little revenue is generated is not directed back to recreation management?
- Are land managers and trail stewards sufficiently protected from lawsuits when accidents happen?

All of these issues flow from outdated legislation that regional plans have no power to fix. Furthermore this legislation is divergent from that in numerous provinces and states that are said to be ahead in responding to OHV use. These are the findings of a pending ELC report titled: *Managing Recreation on Public Land: How Does Alberta Compare?* (summary available in January 2015 *Wildlands Advocate* <http://albertawilderness.ca/archive/wla-archive>).

- **Closing Comments**

Developing the SSRP has been a huge exercise for everyone involved. Whether it advances the Land Use Framework may be a question of expectations going into the exercise. The final SSRP is a first for Southern Alberta in the sense that it is a provincial statutory plan that articulates environmental, economic and social objectives. It is intended to be revisited at regular intervals so it is something to build upon.

However, the SSRP definitely avoids the hard choices on anything involving land. Much like the Land Use Framework and *ALSA*, the SSRP is more of an enabler of future exercises -- a “plan to plan”, or a “to do list” -- than something with direct effect. This result should not discount the huge effort by government staff on plan details and public engagement, which noticeably increased as the process went on, or the efforts of non-government parties that pre-date the Land Use Framework and must continue. The problems with the SSRP flow directly from the vague intentions of the Land Use Framework, the broad discretion provided by *ALSA*, and a focus on planning over commitment to implementation. With some issues as exemplified by recreation, the SSRP was never going to be enough and further reforms are needed. The old rules work less all the time, the new ones have not yet come into play, and in that light it is questionable how far the SSRP really advances the Land Use Framework.