

From: [Darryl Sycamore](#)
To: [RPS](#)
Subject: Submission
Date: Friday, 3 September 2021 9:50:06 a.m.
Attachments: [image001.png](#)
[image002.png](#)
[Submission on the RPS2021 by Darryl Sycamore for Terramark Limited.pdf](#)

Good morning,
Please find attached a submission on the PRPS.

regards

Darryl Sycamore
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Written Submission on Proposed Otago Regional Policy Statement 2021

(Submissions must be received by Otago Regional Council by 3 pm Friday 3 September 2021)

To: Otago Regional Council

1. Name of submitter

Darryl Sycamore

2. This is a submission on the **Proposed Otago Regional Policy Statement 2021**.

3. I **could not** gain an advantage in trade competition through this submission.

4. I **am not** directly affected by an effect of the subject matter of the submission that

a. adversely affects the environment; and

b. does not relate to trade competition or the effects of trade competition

5. I **wish** to be heard in support of my submission

6. If others make a similar submission, I **will** consider presenting a joint case with them at a hearing

7. Submitter Details

a. Signature of submitter



b. Signatory name, position, and organisation

Name	Darryl Sycamore
Position	Planning Manager
Organisation	Terramark Limited

c. Date

02. 09. 2021

Address for service of submitter (*This is where all correspondence will be directed*)

d. Contact person (*name and designation, if applicable*)

e. Email:

Darryl@terramark.co.nz

f. Telephone:

03 477 4783

g. Postal address (*or alternative method of service under [section 352](#) of the Act*):

Level 1, 326 Moray Place, Dunedin

8. My submission is:

<i>Column 1</i>	<i>Column 2</i>	<i>Column 3</i>	<i>Column 4</i>
<i>The specific provisions of the proposal that my submission relates to are:</i>	<i>I support, oppose or seek an amendment</i>	<i>The reasons for my views are:</i>	<i>I seek the following decision from the local authority:</i>
Add a new objective and new policies as shown in the relief below.	Amend and incorporate proposed relief below.	The proposed RPS has ignored the unique history and contribution mining has made to Otago, or the value of mining to our region. Nationally, mining generates around \$1.0 billion export earnings a year.	That the following relief is adopted giving recognition to the historical and economic value of the extractive industry in Otago.

		<p>Mineral products are essential components for the green transition, the transition to a low carbon future, cell phones, cars, energy towers, solar panels, wind turbines, fertilizers, machinery and construction.</p> <p>The previous versions of the RPS recognised and provided for the extractive and mining industry in Otago. The proposed RPS fails to recognise and provide for the extractive industries and is a significant omission. As a consequence, it will impact any future full Water Plan reviews; as the absence of any supporting policies in the RPS will direct the Schedule 1 process to not recognise or provide for mineral extraction in the lower order policy framework.</p> <p>There is no rationale to exclude any recognition of the extractive industry in Otago. Competing objectives and policies in the NPSFM, PRPS and RP:W will continue to provide certainty to ensure adverse effects are appropriately considered in the consenting process.</p> <p>The PRPS should set the higher order framework where the RP:W and relevant District Plans provide objectives, policies and rules as a local level. The PRPS is adopting a paternalistic position where these lower order plans are effectively directed to adopt an anti-mining mindset irrespective of the effects.</p> <p>A recent example highlights the problem where the PRPS is silent on the mining industry is shown in the recent consent application publicly notified by the Central Otago District Council by Foothills Mining Ltd (RC210111). The Otago Regional Council lodged an opposing submission to the CODC component sighting the proposal "is inconsistent with the</p>	
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		<p>objectives and policies of the RPS 19 and the Proposed Otago Regional Policy Statement 2021”.</p> <p>It is not accepted the proposal is inconsistent with the RPS19, and of course the proposal is inconsistent with the PRPS2021 because any objectives and policies recognising and providing for the extractive industry have been excluded from the PRPS. This will create significant uncertainty to the viability and success for a number of regionally significant projects in Otago which is at odds with the intent of Part 2 of the Act.</p> <p>The removal of the existing objectives and policies in the current and previous RPS will remove any consenting pathway for the extractive and minerals industries to carry out their activities. This will force all miners to carry out extensive science reporting, including small scale hobby (NZPAM Tier 2) miners who simply do not have the resources to fund river-specific ecological investigations.</p>	
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Proposed Relief

That the following objective and policies are incorporated into the PRPS.

Objective X.1

The use of water and land is recognised as an enabler of mineral extraction and the economic, social and cultural well-being of the region.

Policy X.X.1

Manage activities in rural areas and support the region's economy and communities, by:

- a) Enabling primary production and other rural activities that support that production;
- b) Providing for mineral exploration, extraction and processing.

Policy X.X.2

To recognise the functional needs of mineral exploration, extraction and processing activities to locate where the resource exists.

Policy X.X.3

Manage adverse effects from the exploration, extraction and processing of minerals, by:

a) Giving preference to avoiding their location in the following:

- i. Areas of significant indigenous vegetation;
- ii. Outstanding natural character in the coastal environment;
- iii. Outstanding natural features and natural landscapes;
- iv. Areas of significant indigenous vegetation and significant habitats of indigenous fauna;
- v. Outstanding natural character
- vi. Outstanding natural features and landscapes;
- vii. Outstanding water bodies or wetlands;
- viii. Places or areas containing historic heritage of regional or national significance where the effects on that historic heritage cannot be avoided;

b) Where it is not practicable to avoid locating in the areas listed in a) above due to the functional needs of that activity, the activity shall:

- i. Avoid, remedy or mitigate, as necessary, to minimise adverse effects on values in order to maintain the outstanding or significant nature,
- ii. Consider first biological diversity offsetting, and then biological diversity compensation for residual adverse effects,
- iii. Reducing unavoidable adverse effects by staging development for longer term activities and progressively rehabilitating the site, where practicable.