

From: [Dave van der Zwet](#)
To: [RPS](#)
Subject: Submission from Dave van der Zwet Attached
Date: Friday, 3 September 2021 12:47:57 p.m.
Attachments: [ORC PROP Submission Dave van der Zwet.PDF](#)

Hi There

Please find attached my submission with respect to the proposed regional policy statement.

Regards

Dave van der Zwet

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** *(full name of person/persons or organisation making the submission. Note: The submissions will be referred to by the name of the submitter)*

David van der Zwet

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. *(See notes to person making submission)*
4. I **am not** *(Select one)* 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 *(See notes to person making submission)*
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** *(or person authorised to sign on behalf of submitter)*



- b. **Signatory name, position, and organisation** *(if signatory is acting on behalf of a submitter organisation or group referred to at Point 1 above)*

Name
Position
Organisation

- c. **Date**

3rd September 2021

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

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

David van der Zwet

- e. **Email:**

alsqtn@xtra.co.nz

f. Telephone:

021 428777

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

P.O. Box 1247, Queenstown, 9348

8. My submission is:

Column 1	Column 2	Column 3	Column 4
<p><i>The specific provisions of the proposal that my submission relates to are:</i></p>	<p><i>I support, oppose or seek an amendment</i></p>	<p><i>The reasons for my views are:</i></p>	<p><i>I seek the following decision from the local authority:</i></p>
<p>See relief below</p>	<p>Amend and incorporate proposed relief below.</p>	<p>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.</p> <p>The previous versions of the RPS recognised and provided for the extractive industry in Otago. The proposed RPS is silent.</p> <p>The modern world simply can't function without mining. Mineral products are essential components for the green transition, cell phones, cars, energy towers, solar panels, wind turbines, fertilizers, machinery and construction.</p> <p>I understand that kai tahu values are required. But, the kai tahu values are not significantly identified or mapped in any meaningful way with the RPS. I note in RMIA-WAI – Wai Maori, that suction dredge mining has been identified as an activity which creates concern in terms of bed disturbance. The effects of suction dredge mining is so small, the effects are near negligible. Compare this to even a moderate rain event and the effects are irrelevant. Further,</p>	<p>Measureable environmental outcomes have to be provided in the RPS. In its current form, the RPS does not give enough direction for suitable fit for purpose Regional and District Plans to follow.</p> <p>That the following relief giving recognition and regional value to the extractive industry is incorporated into the RPS.</p>

	<p>suction dredging occurs outside of the indigenous fish spawning periods. It is my view the inclusion of dredging in this context is incorrect. Fish prefer to spawn in the dredge tailings, so there is a clear positive effect. I question how many complaints the ORC has ever received for bed disturbance by suction dredging? I have never seen a newspaper story or a social media post by a concerned resident about bed disturbance by dredging.</p> <p>Clearer and measureable environmental outcomes and kai tahu values over the Otago Region need to be set so that consent paths can be assessed and followed as required.</p> <p>As the RPS stands now, I have no idea what to expect and standards to achieve with respect to my Gold Mining Permit on the Arrow River.</p> <p>By ignoring the extraction community, the ORC risks a return to the early 1990's when suction dredges etc were operating without any consents.</p>	
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Proposed Relief

That the following objectives and policies are incorporated into the RPS.

OBJECTIVES AND POLICIES

Objective X.X

Sufficient land is managed and protected for economic production

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 and significant habitats of indigenous fauna in the coastal environment;
 - ii. Outstanding natural character in the coastal environment;

- iii. Outstanding natural features and natural landscapes, including seascapes, in the coastal environment;
- iv. Areas of significant indigenous vegetation and significant habitats of indigenous fauna beyond the coastal environment;
- v. Outstanding natural character in areas beyond the coastal environment;
- vi. Outstanding natural features and landscapes beyond the coastal environment;
- 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, 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. Consider environmental compensation if adverse effects on indigenous biological diversity, cannot practically be avoided, remedied or mitigated;
- iv. Avoiding, remedying, or mitigating adverse effects on other values including highly valued natural features, landscapes and seascapes in order to maintain their high values;
- v. Reducing unavoidable adverse effects by staging development for longer term activities and progressively rehabilitating the site, where possible.

WAI MAORI

That the reference to suction dredging be removed and read as follows:

Concerns about channel modification and river works:

- o The effects of damming on disruption of natural flow patterns, loss of freshwater habitats and migration of indigenous fish species.
- o The effects on the mauri of the water body from diversion of watercourses upstream and downstream of mines.
- o Impacts of activities such as channel maintenance and channel cleaning on water quality and on disruption of species living in the channel and their habitat.
- o Impacts of channel reshaping, in particular straightening, on river flow and habitats, and the mauri of the water body.
- o The effects of bed disturbance, including ~~suction dredging and~~ gravel extraction, on stream morphology and habitats.
- o Impacts of willow removal on water quality, water temperature and mahika kai habitat.
- o Introduction of exotic weeds through poorly cleaned machinery, and the subsequent impact on bank habitat and water ecosystems.
- o The effects of changes in vegetation cover, including clearance of indigenous vegetation and exotic afforestation, on the water retention capacity of land and consequent flow patterns, which can negatively affect mahika kai and taoka species through a reduction in their habitat.