

From: [Jodie Walker](#) on behalf of [Mike Collins](#)
To: [RPS](#)
Subject: ATTN: ORC Policy Team - Business South Incorporated Submission
Date: Friday, 3 September 2021 1:58:25 p.m.
Attachments: [ORC Regional Policy Statement - FINAL 030921.docx](#)
[form-5-written-submissions-form-on-proposed-otago-rps-2021.pdf](#)

Kia ora

Please find attached submission from Business South Incorporated.

Ngā mihi

Mike

Mike Collins
Tumu Whakarae/Chief Executive
Business South Incorporated

E: mike.collins@business-south.org.nz

M: 021 735 249

Proposed Otago Regional Policy Statement 2021

Information for Submitters

Submissions must be in the prescribed form (Form 5) specified by the Resource Management Act and must be received by Otago Regional Council
by 3 pm Friday 3 September 2021

Privacy: Be aware that **all submissions are considered public**, including your name and address which will be uploaded to ORC website as part of this process. The Council and further submitters will use your name and contact details for correspondence in relation to the making of the Regional Policy Statement.

LODGE A SUBMISSION MANUALLY (*USING FORM BELOW*)

A template complying with the requirements of Form 5 is provided below. Once completed, please forward to ORC by one of the following:

Email: rps@orc.govt.nz Submissions in MS Word or other editable format are preferred, if possible

Post: Otago Regional Council, Private Bag 1954, Dunedin 9054. Att: ORC Policy Team

Hand Delivery at

Dunedin: Otago Regional Council Office, 70 Stafford St, Dunedin, Att: ORC Policy Team

Queenstown: Terrace Junction, 1092 Frankton Road, Queenstown, Att: ORC Policy Team

Alexandra: William Fraser Building, Dunorling Street, Alexandra. Att: ORC Policy Team

INQUIRIES

Email: rps@orc.govt.nz

Phone: ORC Call Centre: 0800 474 082, Monday - Friday, 8am-5pm

NOTES TO PERSON MAKING A SUBMISSION

If you are a person who could gain an advantage in **trade competition** through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be **struck out** if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Go to Written Submission Form on next page

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

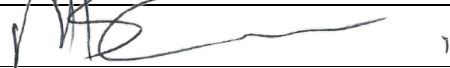
1. **Name of submitter** *(full name of person/persons or organisation making the submission. Note: The submissions will be referred to by the name of the submitter)*

Business South Incorporated

2. This is a submission on the **Proposed Otago Regional Policy Statement 2021**.
3. I ~~could~~/**could not** *(Select one)* gain an advantage in trade competition through this submission. *(See notes to person making submission)*
4. I ~~am~~/**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~~/**do not wish** *(Select one)* to be heard in support of my submission
6. If others make a similar submission, I ~~will~~/**will not** *(Select one)* 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 *Mike Collins*

Position *Chief Executive*

Organisation *Business South Incorporated*

- c. **Date**

3/9/21

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

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

Mike Collins, Chief Executive, Business South Incorporated

e. Email:

mike.collins@business-south.org.nz

f. Telephone:

021 735 249

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

Level 3, 442 Moray Place
PO Box 5713, Dunedin 9058

8. My submission is:

<i>Column 1</i>	<i>Column 2</i>	<i>Column 3</i>	<i>Column 4</i>
<p><i>The specific provisions of the proposal that my submission relates to are:</i></p> <p><i>(Please enter the relevant objective, policy, method, or 'other' provision reference where possible. For example, 'AIR-O1'.)</i></p>	<p><i>I support or oppose the specific provisions or wish to have them amended.</i></p> <p><i>(Please indicate "support" or "oppose" or "amend")"</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><i>(Please be as clear as possible – for example, include any alternative wording for specific provision amendments.)</i></p>
Refer to attached PDF	Refer to attached PDF	Refer to attached PDF	Refer to attached PDF

Note: Additional rows for each separate provision or submission point should be added as required.

Business South Incorporated



Submission

Proposed Otago Regional Policy Statement 2021

Otago Regional Council

Due: 3 September 2021

www.otagochamber.co.nz

www.osea.org.nz

INTRODUCTION

1. Business South welcomes the opportunity to provide a submission on the Proposed Otago Regional Policy Statement 2021 which underpins the planning framework for the management of natural and physical resources in Otago. Our feedback is focused at a high level, given the role and nature of our membership organisation.
2. We provide comments on the proposed policies, methods and S32 Evaluation Report – focusing primarily on Infrastructure, Transport, and Urban Form and Development. These are based on our observations and expectations from our member base. We have therefore used consultation *Form 5* provided by the council in a limited capacity.

ABOUT BUSINESS SOUTH

3. This submission is made on behalf of both the Otago Chamber of Commerce¹ and Otago Southland Employers Association² (OSEA), which will merge to become Business South as a new incorporated society taking effect from 1 October 2021. The Chamber and OSEA are membership-based service organisations, with a combined history of over 300 years between them. For the purposes of this submission, **Business South** will be used as the entity name.
4. Comprised of over 1800 members, Business South actively provides information, advocacy and support for business: connecting members through networking events and functions; providing advice on employment, human resources and health and safety; and developing capability and skills through our training workshops and programmes, including the not-for-profit sector.
5. We also advocate and offer a voice for business concerns and submit on behalf of members on local and national government policy. Representation occurs on behalf of a broad cross-section of business demographics including size, location and industry type, with the full range from small businesses through to large employers and stakeholders in the region.

FEEDBACK

6. We are pleased to make a submission on behalf of our members based in the Otago region. Business South aims to have a thriving Otago community, if the economy is doing well the whole community benefits. The economy needs to be sustainable in the environmental, social and economic sense. A robust economy in the Otago community including urban, rural and service based towns is equally essential for the vitality, health and wellbeing of the residents.

¹ Otago Chamber of Commerce excludes the chamber organisations in the Queenstown Lakes District – Queenstown Chamber of Commerce and Ignite Wanaka.

² Otago Southland Employers Association includes all of the Otago and Southland region.

With this in mind, we strive to provide positive feedback on the proposed policies, methods and evaluation where possible.

Strategic policy setting

7. Business South is aware there are a number of changes in national direction driving the shape and content of Regional Policy Statements, and their relationship with the local and district plans. We are also aware of the requirement to develop the Regional Policy Statement in response to Professor Skelton's report on the council's freshwater planning to the Minister for the Environment.
8. With the drivers for natural and physical resource changes coming from central government, regional councils are required to develop their individual Regional Policy Statements. Councils are implementing amended, and new, policy on: freshwater (including water takes), urban development, highly productive land, indigenous biodiversity, and air quality. Together with the repealing of the Resource Management Act, it is certainly a time of significant change.
9. It is noted the language and concepts are similar to the other government policy directions coming out – placing the health and wellbeing of the environment first, secondly the health needs of people, and lastly the ability of people and communities to provide for their social, economic, and cultural well-being, now and into the future.
10. Business South is concerned about the unintended consequences that government policy decisions may have on businesses and communities in urban, rural and smaller communities, both at a central and local government level. The proposed reforms could have impacts for existing businesses in the region. These natural and physical resource management changes come alongside the impending future transformational change across the New Zealand economy with the Climate Change Commission's recommendations including the potential changes for agriculture, transport, energy and forestry to meet the target of net zero emissions.
11. How businesses, and their communities, adjust and make the necessary changes requires significant leadership and investment. Communication related to resource management will be integral to engaging and informing those in the business community during these times of significant reform.

Consultation

12. Business South is pleased to see there has been a lengthy consultation process aiming to capture a diverse range of stakeholders and views. Having high levels of engagement is very important when setting the resource management policies for our region.
13. Businesses are key stakeholders in the Otago region, and we note industry specific businesses (Section 32 Report, p15, paragraph 54) were given the

opportunity to comment on draft Proposed Regional Policy Statement provisions in February 2021.

14. We are aware the national and regional planning framework is complex. There is a lot of information to process and understand, which is largely technical with legislative standards and regulations, which is much easier to navigate if familiar to those who work, or have an interest, in the planning area. Unpacking consultation documents entailing hundreds of pages is certainly a challenge for the layperson to navigate. We wish to reinforce the importance of having effective and innovative resource management communication for the business community to be kept informed to promote positive ongoing engagement. We suggest that providing high level summary documents a more effective way to communicate intent to the community and to engage in a genuine consultation process.

Section 32 Evaluation Report

15. We note the council has invested in a lengthy consultation process and detailed documentation to evaluate the impact of the proposed policy statement (requirement of the Section 32 Report). Including undertaking an assessment of the benefits and costs of the environment, economic, social and cultural effects. Of interest are the benefits and costs of:
- a. Economic growth that are anticipated to be provided or reduced; and
 - b. Employment that are anticipated to be provided or reduced.
16. It is pleasing to see it is a requirement to also quantify the benefits and costs, and assess the risk of, acting or not acting if there is uncertain or insufficient information.
17. There are, however, a number of assumptions made in deriving the costs (and benefits for that matter) and measuring the full economic impact of the proposed policies and methods for the management of Otago's natural and physical resources. As with modelling generally, assumptions are made and there are often information gaps. We ask that you make it fully known in a transparent manner where those gaps are from an employment and economic perspective to the business and wider community – having information buried in hundreds of pages is prohibitive for the layperson. The Manuhereki River Scenarios is one such recent example where the economic impacts of the minimum flow options have been potentially underestimated.

Domains and Topics

18. Business South has focused on providing high level feedback on three main topics of interest of relevance for business. There will be other topics of interest and our members may consider to making a submission individually.
19. **Energy and Infrastructure (EIT-EN and EIT-INF)**
- a. Business South supports efficient energy and infrastructure policies which are essential to having a thriving regional economy. In doing so it will provide for economic growth through the operation and

maintenance of existing infrastructure and development of new infrastructure.

- b. EIT-INF-04 – Provision of Infrastructure (PORPS p156 and Section 32 Report, p49) – objectives outline having “*effective, efficient and resilient infrastructure.....supports sustainable economic development and growth within the region within environmental limits*”.
 - i. **Comment:** The setting of the limits and how they are implemented will have different degrees of impacts for existing and new businesses. It cannot be underestimated the financial implications and livelihoods for those that could be adversely impacted by the setting of limits.
- c. We note the Regional Policy Statement will clearly identify the nationally significant infrastructure (eg. hydro) and regionally significant infrastructure (eg. Dunedin and Queenstown airports).
 - i. **Question** –There is significant infrastructure that does not yet exist (eg. if Tarras Airport went ahead) and how would this get included in the definition without having to do a plan change?
 - ii. **Comment** - The definition of nationally significant infrastructure has been taken from the NPSUD but should be amended to be relevant to Otago ie. why list North Island infrastructure.
 - iii. **Question** - We seek clarification that, for example, Lake Onslow would meet the definition of the renewable generation under the nationally significant infrastructure definition.
- d. Note the use of the words throughout the Regional Policy Statement – avoid, protect, minimise, promote, environmental limits, encourage. We are aware the case law says that “avoid” is “avoid” ie. cannot happen.
 - i. **Comment:** What would “avoid” mean for businesses? We are aware that there will be implication for new and existing businesses navigating this restriction in being able to viably run a business if there is a work-related activity they can no longer undertake or start-up.
- e. EIT-INF-P13 (1) (a) (PORPS p156-157) – Locating and managing effects of infrastructure. We are aware of concerns with “significant national areas” and the impacts for existing and potentially new business owners. There are implications for the ongoing operation of businesses that have made an investment in an asset that needs to grow. It is now unclear if there is any certainty about the ability to expand and grow the operation.

20. Transport – EIT-TRAN

- a. Business South supports transport policies that boost the economic wellbeing of the regional economy by improving the connectivity, efficiency, accessibility of the transport system for the community, and enabling the movement of goods and services for businesses. Ongoing collaboration between the council and business sector is necessary to

ensure future system changes meet the needs of the wider business community.

- b. We note the relationship with the Regional Transport Plan, the reforms for transport infrastructure and systems, and promotion of active transport in the region.

21. Urban form and development (UFD)

- a. Otago is a region with a growing population, which creates opportunities for employment and challenges for managing land and growing urban areas. We support having policies to facilitate business capacity. Businesses want certainty and efficiency around how growth is managed in the region, with development capacity supported by infrastructure.
- b. With the Regional Policy Statement having no rules it sets the scene and policy across the region eg. urban limits are set, so when there's debate where growth happens, reference will be made back to the Regional Policy Statement. The rules end up in the District and Regional Plans and enable it by zoning. So, the Regional Policy Statement sets the framework for decision making. While there will be many who do not support urban growth limits, having certainty will be beneficial to the business community.
- c. UFD-P4 – Urban expansion (6) (PORPS p189) - we note the proposal to limit urban expansion, which effectively means it cannot happen – “avoids, as the first priority, highly productive land identified in accordance with LF-LS-P19”.
- d. UFD-P5 Commercial activities (PORPS p189) – we support the use of the wording “enabling” to provide for these activities to happen in urban areas.
- e. Defining boundaries - we want to ensure the way council works through the process of defining boundaries is both transparent and engaging, where parties have interests.

22. In principle, Business South supports the use of mapping tools to give certainty for both existing and new businesses. The process the council is proposing and how this is done will be critical. It will be beneficial having a map of the Otago region that will illustrate what is allowed to happen where, including (but not limited to) urban development, energy, infrastructure, transport, significant natural areas, freshwater controls, and managing the coastal environment.

CONCLUSION

23. Thank you again for the opportunity to submit. As a submitter, Business South would like to be kept informed by the council on the next steps, although does not intend to present at the upcoming hearing being run by the Freshwater Hearing Panel.

24. Whilst our membership is largely 'town' or 'urban' based businesses, it cannot be underestimated the impact any significant changes the Proposed Otago Regional Policy Statement may have on the current economic viability of the businesses, including service towns and settlements in the Otago region.
25. Business South aims to have a thriving economy, sustainable environment and connected community. Appropriate natural and physical resource management policies and methods should be balanced with recognising the importance of the economy and profitability of business which bring multiple benefits to the region long term.
26. We are committed to an ongoing working relationship with the council to have both a sustainable environment and economy in the Otago region.

Ngā mihi/Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mike Collins', followed by a long horizontal line extending to the right.

Mike Collins
Tumu Whakarae/Chief Executive
Business South Incorporated

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