

**From:** [Craig Maaka](#)  
**To:** [RPS](#)  
**Subject:** Proposed Otago Regional Policy Statement 2021 Submission Calder Stewart  
**Date:** Friday, 3 September 2021 2:56:15 p.m.  
**Attachments:** [image001.png](#)  
[20210903135416811Signed.pdf](#)  
[20210903 Calder Stewart Submission on proposed Otago RPS 2021.docx](#)

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Hello,

Submission attached.

Kind regards,  
Craig

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## **Craig Maaka**

Forestry Manager

Office 03 417 9777  
Revolution Hills, 142 State Highway 1  
Milton, Otago, 9291, New Zealand  
[calderstewart.co.nz](http://calderstewart.co.nz)

# Written Submission on Proposed Otago Regional Policy Statement 2021

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

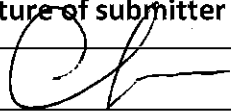
**To: Otago Regional Council**

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)*

Calder Stewart

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

Position Forestry Manager

Organisation Calder Stewart

- c. **Date**

3<sup>rd</sup> September 2021

## 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](mailto: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](mailto: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

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## 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 Craig Maaka*

*Position Forestry Manager*

*Organisation Calder Stewart*

- c. **Date**

3<sup>rd</sup> September 2021

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

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

Craig Maaka

**e. Email:**

[Craig.Maaka@calderstewart.co.nz](mailto:Craig.Maaka@calderstewart.co.nz)

**f. Telephone:**

+64 (0) 3 4179777

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

Calder Stewart  
Revolution Hills  
142 State Highway 1  
Milton  
Otago 9291

**8. My submission is:**

<i>Column 1</i>	<i>Column 2</i>	<i>Column 3</i>	<i>Column 4</i>
<i>The <b>specific provisions</b> of the proposal that my submission relates to are:</i>	<i>We <b>Support</b> or <b>oppose</b> the specific provisions or wish to have them <b>amended</b>. (Please indicate "support" or "oppose" or "amend")</i>	<i>The <b>reasons</b> for my views are:</i>	<i>I seek the following <b>decision</b> from the local authority:  (Please be as clear as possible – for example, include any alternative wording for specific provision amendments.)</i>

<p>LF-LS [Land &amp; Freshwater – Land &amp; Soil] Objectives, Policies &amp; Methods (from p137-141)</p>	<p>We <b>support</b> the Objective &amp; Policies relating to Land &amp; Soil</p>	<p>Maintenance and enhancement of soil &amp; water values are at the heart of good land management. Professional ‘Best practice’ approaches have values (social &amp; environmental) as the centre, within a biophysical context (topography, soils, streams, ecological values, etc.). From there the ‘best’ operational practice (for this time &amp; place) is decided, with monitoring &amp; review to ensure Adaptive Management and learning-by-doing. Importantly, such a ‘best practice’ approach is a <i>*process approach*</i> (an iterative repeating chain of knowledge, identification, thought, action, review → knowledge etc.) based on a changing and complex environment, not a <i>*universal prescription approach*</i> whose dictated practices may or may not be inappropriate to that time &amp; place.</p> <p>Calder Stewart wishes to emphasise that universal activity prescription, without reference to either the shifting values and conditions within any particular local context, is silo thinking, treats the land as a regular (factory) machine, and will lead to adverse outcomes. Process thinking is far more resilience and sustainable than regular prescriptive thinking within the complexity that is inherent within landscapes and socialscapes.</p>	
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		<p><i>Calder Stewart are particularly supportive of the RPS's emphasis on Integrated Management. A greater depth of detail of what is meant by 'Integrated Management' could be beneficial to future management, in particular being mindful of the emergence of Te Ao Māori understanding of not just relationships between the environmental domains (land, soil, water, biodiversity, air, sea, etc.) but also of the relationships between people and land. Being mindful of such emerging worldviews would for example, shift our understanding of 'Kaitiakitanga' from being, not a paternalistic 'stewardship' relationship with people having 'dominion over land', but as a relationship of reciprocity where the health of people (tangata) and land (whenua) are entwined. Tangata-whenua is a hyphenated and indivisible complex, not a machine of divisible parts.</i></p> <p><i>This shift in understanding toward 'integrated management' is a shift from soil, water, land, etc. being dealt with as either-or silos. That conceptual shift is extending to the dismantling the either-or 'dualism' between people (culture) and nature (e.g. Tangata-Whenua as complex, Socio-Ecological Systems as the basis of Resilience Theory etc.).</i></p>	
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		<p><i>This may not be a specific consideration requiring an amendment to this RPS, but the Otago Regional Council is encouraged to engage in discussions around these issues, principally because it will have significant impact on future policy framings, particularly on our current cultural mythology that ‘use necessarily harms’ and ‘preserves necessarily protect’, which so often led to a ‘dis-integration’ of management – the opposite of ‘Integrated Management’.</i></p>	
<p><i>TOPIC – ECO Ecosystems and Indigenous Biodiversity (p142-150)</i></p>	<p><b>We Support the Objectives and Policies</b> relating to ECO, with suggested <b>amendments.</b></p> <p><b>We would Oppose any interpretation of the Methods</b> within ECO that would suggest forestry requiring resource consents for existing use activities in association with SNAs.</p>	<p><i>The Objectives and Policies as outlined are supported, particularly the integration of culture.</i></p> <p><i>The area of concern relates to Significant Natural Areas, not in terms of the criteria for identification, but in the understanding of the genesis of those values, and their on-going identification and protection within forestry management Best Practice frameworks.</i></p> <p><i>There have been instances in the past, and which still occur, where ecological significance is identified within the so-called ‘working lands’, be they forestry or extensive low-input agriculture, and the assumption is applied that those values are there *in spite* of human activity, not *because* of human activity.</i></p>	<p><b>Amend</b> to include positive human activities (especially less intensive land uses) as the potential and actual genesis for significant values.</p> <p><i>While the Methods in ECO do not specifically require resource consent for land users in the agricultural and forestry sectors, such interpretations by district councils might be made.</i></p> <p><b>Amend</b> to include within Methods: “The encouragement of Best Practice adaptive management approaches to Land users as a means of ensuring values are identified and protected, and to build connections between land users and any cultural and ecological values.</p>

		<p><i>Lightly grazed tussock and browsed gorse are associated with rare indigenous species, where a change in practice (to either more intensive land use or removal of human engagement) threatens those values.</i></p> <p><i>Within forestry, an edge ecotone and a shady understory result through time in other woody regeneration, especially where there is 1. Sufficient moisture, 2. A native seed source, 3. Subcanopy light from thinning, and 3. Time (usually within ten years if conditions are right). Some of those sub-canopy indigenous vegetation associations have been identified as 'significant' in the past. Similarly for indigenous riparian areas that have regenerated, and whose values are enhanced by advancements in forestry best practices (for instance, minimising heavy machinery use around streams).</i></p> <p><i>Forestry is also associated with long stable periods where stream ecosystems benefit from the soil retention, water quality (through soil percolation), water-pattern &amp; stream permanence through a forest having a more 'sponge' effect, than plate-runoff (boom-bust) hydrological effect, and maintenance of structurally-diverse stream morphology (structural diversity is associated with biodiversity –</i></p>	
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		<p><i>as contrasted with a singular ditch-type morphology). The results are ecologically significant with regard to koura and galaxiids. These values remain over multiple forestry rotations. For example, Berwick Forest has galaxiids present within areas that are into their fourth, possibly fifth rotation.</i></p> <p><i>In addition, forestry is associated with proportions of their estate associated with frost areas, wetlands and bluffy country that are biodiversity hotspots protected by lack of intensive browse and agricultural drainage.</i></p> <p><i>The specific concern relating to SNA is therefore, not in their identification, but in the possible Methods that may be applied by councils to protect and enhance such areas. Should such methods involve the simple removal of human activity, without regard to the history and genesis of those values, then those values could be threatened. The days of “use necessarily harms” and “preserves necessarily protect” are well gone.</i></p> <p><i>The preferred method for both protecting ecological values within complex and shifting ‘socio-ecological’ landscapes (see comments relating to LF-LS above) is to work within Best Practice process</i></p>	
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		<p><i>approaches centred around values and local context, with local people having essential ecological knowledge of that locale. This approach is in accordance with the values of Collaboration as outlined throughout the Proposed RPS. The benefits of such process approaches involve not just better outcome without unforeseen consequences, but also a better cultural integration between, and ownership of, those values and activities (the opposite of a ‘work to rule’ resource consent prescription approach).</i></p> <p><i>Calder Stewart would <b>oppose</b> *any interpretation* of the Methods within ECO that would suggest any resource requirements associated with SNAs. Such an approach is considerably inferior to collaboration with the sector on refining Best Practice – (it bears repeating) practices that are not amenable to widespread universal prescription, and where those best able to assess and determine best practice are those culturally-connected to the particulars of place.</i></p>	
<p><b>Note:</b> Additional rows for each separate provision or submission point should be added as required.</p>			