

## Liam Glading

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**From:** Jeremy Baker <info@cosyhomes.org.nz>  
**Sent:** Tuesday, 7 September 2021 8:21 a.m.  
**To:** RPS  
**Subject:** Submission on Proposed RPS/Request for waiver for lateness  
**Attachments:** Cosy Homes Trust-submissions-form-on-proposed-otago-rps-2021.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Submission - Sector stakeholder, LATE

Kia ora

Attached is the submission of the Cosy Homes Charitable Trust.

I acknowledge this has been submitted after the 3 September deadline. I request a waiver for lateness so that this submission can be considered. Thank you.

Nāku noa, nā

Dr Jeremy Baker  
Executive Officer

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Email: [jeremy@cosyhomes.org.nz](mailto:jeremy@cosyhomes.org.nz)



Cosy Homes Trust | [www.cosyhomes.org.nz](http://www.cosyhomes.org.nz) | [info@cosyhomes.org.nz](mailto:info@cosyhomes.org.nz)

## 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

# 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)*

Cosy Homes Charitable Trust

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)*

*Jeremy Baker*

- 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 **Jeremy Baker**

Position **Executive Officer**

Organisation **Cosy Homes Charitable Trust**

- c. **Date**

3 September 2021

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

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

Jeremy Baker

**e. Email:**

info@cosyhomes.org.nz

**f. Telephone:**

021 999 395

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

10 George St, Mezzanine Level, Dunedin 9016

**8. My submission is:**

| <i>Column 1</i>  | <i>Column 2</i>  | <i>Column 3</i>   | <i>Column 4</i>   |
|--|--|---|---|
| <p><i>The <b>specific provisions</b> 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 <b>support</b> or <b>oppose</b> the specific provisions or wish to have them <b>amended</b>.</i></p> <p><i>(Please indicate "support" or "oppose" or "amend")"</i></p> | <p><i>The <b>reasons</b> for my views are:</i></p>  | <p><i>I seek the following <b>decision</b> 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> |
| SRMR – Significant resource management issues for the region   | Amend  | Air quality is fundamental to human well-being and the health impacts of poor air quality are extensively documented. | Add an SRMR-I related to poor air quality: "Poor ambient air quality is negatively impacting human health"  |

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|   |         | <p>The ongoing failure to meet the NESAQ – the minimum standards set to protect human health – in several areas across the region is clearly a “significant” issue given its implications for public health.</p> <p>(Discussion of air quality under SMRM-I4 is noted, but is insufficient for the reasons set out above.)</p>   |  |
| AIR–O1 – Ambient air quality              | Support | Agree that air quality is vital for the reasons stated in AIR-O1.  | Adopt AIR-O1.  |
| AIR–P2 – Improve poor ambient air quality | Support | Phasing out non-compliant solid fuel heating devices is vital to improving air quality in Otago.   | Adopt AIR-P2.  |
| AIR–M2 – Regional plans                   | Amend   | <p>While we generally support AIR-M2, health impacts from PM pollution are cumulative, so time is of the essence in implementing an air quality improvement programme.</p> <p>ORC should act with urgency to implement its <i>Regional Plan-Air</i> and <i>Air Quality Strategy for Otago</i> to prevent unnecessary negative health outcomes for Otago residents.</p> | <p>Amend Air-M2 by moving the timeline forward one year as follows:</p> <p>“No later than 31 December 2023, Otago Regional Council must prepare or amend and maintain its <i>regional plans</i> . . .”</p> |
| AIR–M5 – Incentives and other mechanisms  | Support | Experience in other regions (e.g., Canterbury, Nelson) demonstrates that a comprehensive approach including community education and financial  | Adopt AIR-M5.  |

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|  |         | <p>incentives is effective in improving degraded air quality.</p> <p>Improving the thermal performance and energy efficiency of Otago’s existing housing stock has strong potential to contribute to reduced PM emissions from home heating, as well as improved health outcomes.</p> <p>Resilience of electricity infrastructure is key to enabling expanded uptake of clean heating options.</p> |  |
| <p>EIT-EN-03 – Energy use</p> <p>EIT-EN-P9 – Energy conservation and efficiency</p> <p>EIT-EN-M3 – Education and information</p> | Support | <p>Appropriate layout and orientation of housing developments can result in increased occupant comfort/well-being and reduced heating demand. The reduction in heating demand has the potential to reduce air quality impacts related to combustion of solid fuels.</p> <p>Community education regarding energy efficiency/conservation opportunities is vital to maximising uptake.</p>           | Adopt EIT-EN-03, EIT-EN-P9, and EIT-EN-M3. |
| EIT-EN-P8 – Small and community scale distributed electricity generation   | Support | Enhanced diversity of generation (scale and location) and network resilience will enhance energy security and opportunities for clean heating.   | Adopt EIT-EN-P8.                           |

|   |         |   |                     |
|---|---------|---|---------------------|
| UFD-02 (1) –<br>Development of urban<br>areas   | Support | Improved housing choice, quality and availability are necessary for the continued vitality and sustainability of Otago communities.   | Adopt UFD-02(1).    |
| UFD-M2(3)(f) – District<br>plans  | Support | Appropriate layout and orientation of housing developments can result in increased occupant comfort/well-being as well as reduced heating demand, which has the potential to reduce air quality impacts from solid fuel combustion. | Adopt UFD-M2(3)(f). |
| <b>Note:</b> Additional rows for each separate provision or submission point should be added as required. |         |   |                     |