

From: [Lauder Creek Farming](#)
To: [RPS](#)
Subject: Submission pRPS
Date: Friday, 3 September 2021 1:07:10 p.m.
Attachments: [Submission pRPS 3rd Sept 2021.pdf](#)

Hello,
Please find attached our submission on the pRPS.
Kind regards
Kelly Heckler

Lauder Creek Farming
James 0276811000
@laudercreeknz

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

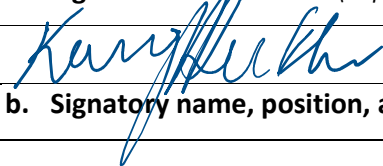
1. **Name of submitter** *(full name of person/persons or organisation making the submission. Note: The submissions will be referred to by the name of the submitter)*

Lauder Creek

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** 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)*

- 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)

Kelly Heckler

e. Email:

office@laudercreek.co.nz

f. Telephone:

0276030333

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

Email is preferred

8. My submission is:

Overall, the RPS seems to capture the many and varied issues Otago is facing. In some areas of the RPS there is an important lack of details which may impact how the policy is implemented. This can contribute to uncertainty in the community. Additional work is needed around clarification and definition so the policy implications are well understood by the people of Otago.

As identified in the RPS some important monitoring is needed to formulate some robust objective measures that can translate to parameters businesses and people need to plan their way forward.

<i>The specific provisions of the proposal that my submission relates to are:</i>	<i>I support or oppose the specific provisions or wish to have them amended.</i>	<i>The reasons for my views are:</i>	<i>I seek the following decision from the local authority:</i>
SRMR – I1 Natural Hazards	Support in part	A significant risk to many rural communities is the risk of uncontrolled fire either from natural or human causes. This is especially of concern if climatic conditions align.	Fire should also be considered as a natural hazard and addressed in the RPS.

<i>SRMR -15 Impact Snapshot - Environmental</i>	<i>Support in part</i>	Natural flow regimes need to be defined clearly.	<i>Provide clear definition on natural flow regimes.</i>
<i>RMIA-MKB-14 – Shortage of protected and secure areas for biodiversity</i>	<i>Support in part</i>	Areas of biodiversity shouldn't be limited to specific areas only. Methods for including biodiversity into both urban and rural landscapes could be adapted which would allow biodiversity to be incorporated alongside our current community's way of living.	<i>Identify methods which can increase biodiversity within the community.</i>
<i>IM-P1 – Integrated approach</i>	<i>Support in part</i>	It's unclear how integrated management is defined in practical terms. Previous consultation methods have had varying levels of success. For integrated management to be successful some more clarification is needed around implementation and what this will entail for all parties.	<i>Clarification on how integrated management is to be implemented.</i>
<i>IM-P6 – Acting on best available information</i>	<i>Amend</i>	Information to make decisions needs to involve an element of robust science. It is unclear in the RPS if best available information includes robust science.	<i>Define “best available information to include robust science”</i>
<i>AIR-P5 – Managing certain discharges</i>	<i>Oppose in part</i>	While this policy identifies that certain discharges to air need to be managed, there is minimal mitigation methods identified. Direction is needed to ensure the policy can be adhered to.	<i>Clarification around the management and mitigation methods of this policy.</i>
<i>LF-VM-O2 – Clutha Mata-au FMU vision (7)(b)(i)</i>	<i>Support in part</i>	Clarification is needed on what the <i>natural form and function</i> is. This needs to be supported by science and objective measures.	<i>Definition with supporting science to define natural form and function.</i>
<i>LF-VM-O2 – Clutha Mata-au FMU vision (7)(b)(iii)</i>	<i>Oppose</i>	If the values based on robust science are being met for the tributary, why limit the	<i>Remove objective</i>

		water abstraction which could have positive social and economic benefits for the community with no impact on the values. This objective doesn't provide balance.	
LF-LS-P19 – Highly productive land	<i>Support in part</i>	Identification of the LUC classes that will be classified as highly productive. LUC classes 1, 2, 3 and 4 are highly productive especially with irrigation.	<i>Define what LUC will be high productive land.</i>
LF-LS-P22 – Public access (3)	<i>Support in part</i>	Negative impacts from public access on the farming business also needs to be mitigated.	<i>Addition of (g) against negative impacts of public access on farming business.</i>
UFD-P7 –Rural Areas	<i>Support in part</i>	Our productive land needs to be protected from housing and other areas of urban development. Housing cannot be given preference to food production. In areas of water short catchments such as Central Otago additional housing and rural lifestyle is impacting on the water available in the catchment at the expense of irrigation or the environment.	<i>Careful consideration is needed for rural lifestyle and smaller section development in water short catchments.</i>