From: Lloyd, M90 Farm Solutions
To: RPS
Subject: Submission
Date: Friday, 3 September 2021 2:23:17 p.m.
Attachments: form-5-written-submissions-form-on-proposed-otago-rps-2021 (LLOYD).docx

Kia ora

Attached is my submission to the RPS
I wish to be heard in support of my submission

Ngā mihi

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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)*

Lloyd McCall

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 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** *(Select one)* to be heard in support of my submission
6. If others make a similar submission**, I 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 *Position* *Organisation*

    c. **Date**

30 August 2021

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

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

Lloyd McCall

e. Email:

lloyd@m90fs.co.nz

f. Telephone:

0272489090

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

8 Kent Street, Tapanui 9522

8. My submission is:

Column 1	*Column 2*	*Column 3*	*Column 4*
*The **specific provisions** of the proposal that my submission relates to are:* *(Please enter the relevant objective, policy, method, or 'other' provision reference where possible. For example, 'AIR-O1'.)*	*I **support** or **oppose** the specific provisions or wish to have them **amended**.* *(Please indicate "support" or "oppose" or "amend")"*	*The **reasons** for my views are:*	*I seek the following **decision** from the local authority:* *(Please be as clear as possible – for example, include any alternative wording for specific provision amendments.)*

SRMR-16 *Page 76* *Snapshot,* *Environmental*	*Comment*	*Base water testing data seems to be taken from water testing done between 2006 and 2017. This is outdated. This document should be based off the very latest information.* *The system of using 80 percentile and 5 year rolling averages already dates the information.* *The period used represents the period of significant land use change and is likely to show not only the worst results but worst trend giving a biased perception of water quality*	*Use the most up to date water testing results to inform the areas base water quality for the RPS* *This includes both physiochemical and physical assessments*
LF-FW-08 (2)	*Amend*	*Water flows will not always be continuous depending on season etc eg ephemeral waterways*	*Add 'Natural' water flow is continuous*
LF-FW-P7(3)(4)	*Amend*	*What is the expectation of waterways being of drinking standard. Some water in native bush is not suitable for drinking*	*Remove drinking water from this clause* *Add another clause that says existing and new drinking water sources are safe for human consumption*
LF-FW-P8	*Change*	*Area of natural wetlands is very small at .05ha (500m2).* *Better to fully map and protect larger area say 1ha or bigger* *Administrative nightmare to find and map very small areas. Landowners would be unlikely to support this.*	*Change 0.05ha to 1ha and then promote and enable the protection of these areas*
LF-FW-M6	*Comment*	*ORC **must** publicly notify……..* *In todays world with pandemics and fast passed nature of change a fixed time frame is dangerous. It would be far better to have full consultation rather than*	*Change the wording to ORC is targeting to notify ……..*

		doggedly sticking to a time frame resulting in a top down plan.	*This is through out the document referring to the notification of regional plan*
LF-LS-P16-22	*comment*	*These policies need strengthening. It is land intensification with the addition of non natural soluble growth stimulants giving productivity beyond the lands capability that eventually leads to discharges effecting water quality*	
LF-LS-M11	*comment*	*In this section could there be a clause that say ORC will promote implementation new farming techniques and non soluble and/or chemical natural fertiliser solutions*	
ECO-P9	*Amend*	*Need to include other invasive exotic species like sycamore, silver birch etc*	*Widen the scope from just wilding Pines to all invasive species of trees*
ECO-M2 & P2	*Comment*	*Definition of SNA needs clarification. I am not familiar with APP2.* *It is important to recognise and protect significant areas rather than try to capture all areas with some significance. Large areas should be targeted like bush mainly under DOC control that is deteriorating with weeds and pest (large and small) invasions. Small areas are troublesome to protect and have low impact on overall biodiversity*	*Include minimum size of areas classified as SNA like wetland this could be say 1ha. Only smaller if there is a specific highly endangered species of national significance.*

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

Comment

Having read the Proposed RPS and some of the supporting information I would like to make the following comments

- There is a lot of information in here

- I think the RPS document is well set out and uses language everyday people can understand
- The role of Mana whenua and the overview of Otago's Resource Management issues are well set out. I found this very informative. It would be good to somehow get more of this background information to the general public.
- This is an overarching document from which the FMU based Land and water Plans will be informed. It sets out clear bottom lines and expectations

- My interest is in water quality and biodiversity
- The key outcome of the RPS and Land and Water Plans is in its long term vision *to manage and protect the natural ecosystems that support the well-being of present and future generations, mō tātou, ā, mō kā uri ā muri ake nei.*
- This vision requires an approach that gets results. We will only be successful if the people are on the journey. Look at the big picture.
- Fully protect significant areas of national significance rather than trying to protect everything.
- The risk is the low fruit is missed while trying to pick the small fruits that on their own cannot survive.
- If you have major areas of natural habitat in decline or worse being planted in exotic trees while trying to protect the small individual trees the environment will be in a lose, lose situation.
- You can achieve a win win by working with the people to identify the trully significant areas and then fully protect those areas
- The whole community will benefit from protecting these areas therefore it is the responsibility of the whole community to assist in the protection and regeneration of these areas.
- We must remember we are all on the journey. We are all at different stages of the journey. We as a community need to work as one by education and encouragement so people do not stop progressing.
- **Success will be achieved by the people not because of the words** (too much talk and regulation)

- It is imperative that the up coming Land and Water Plans are developed in conjunction with the people. This will give ownership to the people. The current consultation model via submissions takes the ownership away from the people. The responsibility then passes from the people to the regulatory authorities resulting in a them and us situation.

- The government deadline of 2023 for the Land and Water Plan to be notified should be respected but not at the cost of removing ownership from the people