

**From:** [Jean-Luc Payan](#)  
**To:** [RPS](#)  
**Cc:** [Warren Hanley](#); [Anita Dawe](#); [Tim van Woerden](#)  
**Subject:** ORC submission APP6  
**Date:** Friday, 3 September 2021 2:57:40 p.m.  
**Attachments:** [Submissions-RPS-APP6-ORC.docx](#)  
[image001.png](#)

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Hi,  
Please find attached ORC submission.



**Jean-Luc Payan**  
MANAGER NATURAL HAZARDS

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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](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)*

Otago Regional Council

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 Gavin Palmer*

*Position General Manager Operations*

*Organisation Otago Regional Council*

**c. Date**

03/09/2021

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

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

Warren Hanley

**e. Email:**

warren.hanley@orc.govt.nz

**f. Telephone:**

0224693663

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

Private Bag 1954, Dunedin 9054.

**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-01'.)</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>

<p>APP6-Methodology for natural hazard risk assessment</p>	<p><b>Amend</b></p>	<p><i>In Table 8: Risk table, the lower frequency natural hazard scenarios with estimated AEP of <math>\leq 0.1\%</math> ('unlikely' or 'rare'), are considered to have 'Tolerable' risks even if their consequences may be classed as 'Catastrophic'.</i></p> <p><i>Similarly, 'likely' natural hazard scenarios (2-1% AEP) are considered to have 'Tolerable' risks even if their consequences may be classed as 'Major'.</i></p> <p><i>There is a risk with the current Table 8 that the natural hazards risks in some areas in the region will not be assessed or accounted for appropriately if they are categorized as 'Tolerable'.</i></p> <p><i>Table 8 should better reflect that, in some areas in the region, natural hazard scenarios with major or catastrophic consequences can be considered as 'Significant' risks instead of 'Tolerable' risks. This will ensure the risks are assessed and accounted for appropriately.</i></p> <p><i>This also ensures better alignment with HAZ-NH-P5 – Precautionary approach to natural hazard risk.</i></p>	<p><i>Option 1: Re-categorise the 'unlikely' or 'rare' but 'catastrophic' natural hazard scenarios as 'Significant' risks (red category) and re- categorise the 'likely' but 'major' natural hazard scenarios as 'Significant' risks (red category).</i></p> <p><i>Option 2: Require undertaking a quantitative risk assessment if the natural hazard scenarios generate risk that is significant, or if a consequence is catastrophic or major. This can be achieved by amending the second paragraph in APP6-Step 4 as follow: 'If the assessment undertaken in Steps 1-3 determines that one of the three natural hazard scenarios generate risk that is significant, <u>or if a consequence is catastrophic or major,</u> undertake a quantitative risk assessment utilising the following methodology'. This would ensure any natural hazard scenario where the consequences may be 'Catastrophic' or 'Major' requires a quantitative risk assessment to be completed and if this approach is not possible then a precautionary approach would apply.</i></p>
<p><b>Note:</b> Additional rows for each separate provision or submission point should be added as required.</p>			