

**SUBMISSIONS ON
THE PROPOSED OTAGO REGIONAL POLICY STATEMENT 2021**

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1. INTRODUCTION

Ravensdown Limited – Overview and Interests in the Otago Region

- 1.1 Ravensdown Limited (**Ravensdown**) is a farmer owned co-operative. Ravensdown’s goal is to enable smarter farming for a better New Zealand. Given this goal, Ravensdown provides products, namely fertiliser and agrochemicals (agrichemicals), expertise and technology to help farmers reduce environmental impacts and to optimise value, or outputs, from land.
- 1.2 Ravensdown, in deciding whether to participate in regional planning processes, considers whether the planning document will achieve the purpose of the Resource Management Act 1991 (**RMA**) while also evaluating whether the planning provisions will unduly constrain its own activities (i.e., manufacturing, store sites and quarries) and/or the users of their products (i.e., its farming shareholders).
- 1.3 In this context, the nature of Ravensdown’s interests in the Otago region includes the Dunedin Works in Ravensbourne, Dunedin, which manufactures a range of fertiliser products which are then supplied throughout the South Island and a bulk stores located throughout the region (Oamaru, Cromwell, Balclutha and Milton). In addition, through Ravensdown Environmental, Ravensdown assists its shareholders and others to meet regional planning requirements through the provision of farm environment services, which include nutrient loss and mitigation modelling (including OVERSEER Nutrient Budgeting), Farm Environment Plan development and associated resource consent planning services.
- 1.4 Given the nature of Ravensdown’s activities in the Otago region, Ravensdown seeks to ensure that the ‘Proposed Otago Regional Policy Statement June 2021’ (**PORPS 2021**) promotes the sustainable management of natural and physical resources within the region. This includes the ability to continue to use and develop resources, including the rural land resource, while ensuring that adverse effects of activities, including industrial activities, are avoided, remedied or mitigated.
- 1.5 Given the above context, the provisions of the PORPS 2021 which are of interest to Ravensdown, given its activities within the region, are as outlined in **paragraph 1.3** above. Therefore, in preparing this submission, Ravensdown has focussed on the proposed provisions that relate to their DunedinWorks site, its bulk stores as well to the provisions which are of relevance to farming activities undertaken by its farming shareholders within the Otago region.

Overview of Submission

- 1.6 Ravensdown’s submission, given its key interests within the Otago region, generally supports the aspirational purpose of the PORPS 2021 to achieve long-term sustainably, by integrating the protection, restoration, enhancement and use of the natural and physical resources of the Otago region.
- 1.7 However, Ravensdown has concerns about some of the approaches adopted, particularly where the proposed provisions of the PORPS 2021 deviate from the purpose and principles of the RMA. For example, the aim to achieve ‘environmental sustainability’ rather than promote sustainable management of natural and physical resource as required by section 5(1) of the RMA.

- 1.8 Therefore, through these submissions, Ravensdown seeks amendments that enable Ravensdown's Dunedin Works and Otago stores, its shareholders and the users of its products to continue to use and develop resources in the region in a manner that continues to provide for the sustainable management of natural and physical resources, while also ensuring that adverse effects on the environment are avoided, remedied or mitigated.
- 1.9 Ravensdown's submissions on PORPS 2021 are structured as follows:
- (a) Specific submission points on the provisions of the PORPS 2021 are contained in the table provided in **Attachment A**;
 - (b) A conclusion, including the overarching reasons for the submission, is provided in **Section 2**.
- 1.10 Ravensdown also requests any **consequential amendments** arising from the specific submission points contained in **Attachment A**.

2. CONCLUSION

- 2.1 Ravensdown generally supports the PORPS 2021, subject to the amendments requested to address the concerns raised within its submission. In relation to the provisions that Ravensdown has raised concerns about, those provisions require amendment because, without amendment, those provisions:
- (a) will not promote sustainable management of resources and will not achieve the purpose of the RMA;
 - (b) is contrary to Part 2 and other provisions of the RMA;
 - (c) will not enable the social and economic well-being of the community within the Otago region;
 - (d) will not meet the reasonably foreseeable needs of future generations;
 - (e) will not achieve integrated management of the effects of the use, development or protection of the region's natural and physical resources;
 - (f) will not enable the efficient use and development of Ravensdown's assets and operations, and of those resources which are dependent on, or benefit from, Ravensdown's assets and operations; and
 - (g) do not represent the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.
- 2.2 Ravensdown could not gain an advantage in trade competition through this submission.
- 2.3 Ravensdown wishes **to be heard** in support of its submissions.
- 2.4 If others are making a similar submission, Ravensdown will consider presenting a joint case with them at the hearing.

Date: 3 September 2021



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Carmen Taylor

Consultant Planner (Associate)

Authorised to sign this submission on behalf of Ravensdown Limited

ATTACHMENT A – RAVENSDOWN LIMITED’S SUBMISSIONS ON THE PROPOSED OTAGO REGIONAL POLICY STATEMENT 2021

Where amendments to the provisions of the Proposed Otago Regional Policy Statement 2021 are being sought by Ravensdown Limited in its relief sought, the amendments are shown in tracked changes and are also shaded (i.e., underline text for additions and ~~strikethrough text~~ for deletions).

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
PART 1 – INTRODUCTION AND GENERAL PROVISIONS					
<i>Interpretation</i>					
1	Commercial port activity	18	Support in part	<p>The Ravensbourne wharf, which adjoins Ravensdown’s Dunedin Works, is used by the site for the receipt of raw materials and dispatch of product. The wharf is used solely by the Dunedin Works, in accordance with a lease arrangement with Port Otago who own the wharf and associated dolphins.</p> <p>The Ravensbourne wharf is therefore part of the commercial port activity that takes place within the Otago Harbour. Accordingly, while supporting the proposed definition, Ravensdown also considers that the Ravensbourne wharf needs be recognised as forming part of the port’s operations (and facilities) alongside the facilities at Port Chalmers and Dunedin.</p> <p>Finally, it is understood that the official name of the harbour is ‘Otago Harbour’, not ‘Otago Harbor’. Therefore, it is suggested that this correction is made to the definition, as well as elsewhere in the PORPS 2021.</p>	<p>Amend the definition of ‘Commercial port activity’ as follows:</p> <p><i>means commercial shipping operations associated with the Otago Harbour and the activities carried out at the ports at Port Chalmers, Ravensbourne and Dunedin, which include:</i></p> <p>(a) <i>Operation of commercial ships in Otago Harbour;</i></p> <p>(b) ...</p>
2	Highly valued natural features and landscapes	24	Oppose	<p>The PORPS 2021 introduces, and uses, the concept of ‘Highly valued natural features and landscapes’ which according to this definition are features, landscapes and seascapes which represent the attributes and values of significance in accordance with sections 7(c) and 7(f) of the Resource Management Act 1991 (RMA), and which have been identified in accordance with APP9 of the</p>	<p>Delete the definition for ‘Highly valued natural features and landscapes’ in its entirety.</p> <p><i>highly valued natural features, landscapes and seascapes are areas which contain attributes and values of significance under Sections 7(c) and 7(f) of the RMA 1991, which have been identified in accordance with APP9.</i></p>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
				<p>PORPS 2021.</p> <p>Under the RMA, section 6(b) identifies that outstanding natural features and landscapes are to be protected from inappropriate subdivision and development, while section 6(a) identifies that the natural character of the coastal environment is to be preserved. Section 7 of the RMA, identifies other matters to have ‘particular regard to’, including the maintenance and enhancement of amenity values and the quality of the environment (sections 7(c) and (f)).</p> <p>Ravensdown considers that this proposed definition, in the context of the criteria used in APP9 (as discussed in Sub. Ref. 101 below) and the use of the term within objectives and policies, actually refers to section 6(a) and (b) considerations, not sections 7(c) and (f). However, if the definition is intended to refer to section 7(c) and (f) matters, the definition has placed an interpretation on these provisions of the RMA that does not reflect what these sections of the RMA actually say. For the above reasons, Ravensdown opposes this proposed definition, as well as its use throughout the PORPS 2021.</p>	<p>AND, as a consequential amendment, remove and/or amend all references to ‘Highly valued natural features and landscapes’.</p>
3	Natural hazard works	29	Oppose	<p>The proposed PORPS 2021 definition of ‘natural hazard works’, which is linked to the definition contained in Regulation 51(1) of the National Environmental Standard for Freshwater 2020 (NES-F), solely relates to the removal material (i.e., trees, debris and sediment) in and around ‘natural wetlands’. However, it is considered that the general public’s understanding of ‘natural hazards works’ would be broader than this definition (i.e., flood protection works, coastal erosion works, landslide remediation etc).</p>	<p>Delete the definition for ‘Natural hazard works’ in its entirety.</p>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
				<p>In addition, 'natural hazard works' is only used in Policy LF-FW-P9 (Protecting natural wetlands) of the PORPS 2021.</p> <p>Given the potential issues around the broader interpretation of natural hazard works, and the use of the term within only one policy, rather than defining the term within the PORPS 2021, Ravensdown considers that the definition should be deleted (and the policy amended to refer to the specific regulations in the NES-F).</p>	<p>has the same meaning as in regulation 51(1) of the National Environmental Standard for Freshwater 2020 (as set out in the box below)</p> <div style="border: 1px solid black; padding: 5px;"> <p>means works for the purpose of removing material, such as trees, debris, and sediment, that</p> <p>(a) is deposited as the result of a natural hazard, and</p> <p>(b) is causing, or is likely to cause, an immediate hazard to people or property</p> </div> <p>AND, consequential amendments arising from this submission point.</p>
4	Other infrastructure	30	Oppose	<p>Similar to the issue raised above (Sub. Ref. 3), this definition, given its direct link to Regulation 3 of the NES-F, specifically relates to maintenance and operations of 'other infrastructure' in and around 'natural wetlands' (as regulated by Regulations 46 and 47 of the NES-F).</p> <p>As discussed above in relation to the definition of 'natural hazards works', the term 'other infrastructure' can have a broader meaning than that provided for by the PORPS 2021 definition. Also, 'other infrastructure' is only used in Policy LF-FW-P9 (Protecting natural wetlands) of the PORPS 2021.</p> <p>Given the potential issues around the broader interpretation of other infrastructure, and the use of the term within only one policy, rather than defining the term within the PORPS 2021, Ravensdown considers that the definition should be deleted (and the policy</p>	<p>Delete the definition for 'Other infrastructure' in its entirety.</p> <p>has the same meaning as in regulation 3 of the National Environmental Standard for Freshwater 2020 (as set out in the box below)</p> <div style="border: 1px solid black; padding: 5px;"> <p>means infrastructure, other than specified infrastructure, that was lawfully established before, and in place at, the close of 2 September 2020</p> </div> <p>AND, consequential amendments arising from this submission point.</p>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
				amended to refer to the specific regulations in the NES-F).	
5	Polluted airshed	31	Oppose	<p>This definition has the same meaning as that provided in Regulation 17(4) of the Resource Management (National Environmental Standards for Air Quality) 2004 (NES-AQ 2004).</p> <p>Amendments to the NES-AQ 2004 are currently under consideration, with the Ministry for the Environment's webpage advising that a new (i.e., gazetted) national environmental standard is expected to be released in mid to late 2021. Although the final form of the new national environmental standard is not known, the consultation discussion document outlined a move from PM₁₀ to PM_{2.5}, as a contaminant of concern, with some associated changes to how a polluted airshed would be determined. The NES-AQ 2004, and the proposed amended national environment standard, place restrictions on new discharges into polluted airsheds unless offsetting is providing within the polluted airshed.</p> <p>As the NES-AQ 2004 is likely to be amended in the very near future, and given the direct connection of polluted airsheds to the NEA-AQ 2004, or replacement standards, it is considered that the inclusion of a definition for 'polluted airshed' in the PORPS 2021 is not needed and should be deleted (i.e., the NES-AQ 2004, or replacement standard, outlines what a polluted airshed is and what regulatory controls apply to such airsheds).</p>	<p>Delete the definition for 'Polluted airshed' in its entirety.</p> <p>has the same meaning as in regulation 17(4) of the National Environmental Standard for Air Quality 2004 (as set out in the box below)</p> <div style="border: 1px solid black; padding: 5px;"> <p>(a) an airshed becomes a polluted airshed on and from 1 September 2012 or any later day if, for the immediately prior 5 year period—</p> <p>(i) the airshed has meaningful PM₁₀ data for at least a 12-month period; and</p> <p>(ii) the airshed's average exceedances of PM₁₀ (as calculated under regulation 16D) was more than 1 per year; and</p> <p>(b) an airshed stops being a polluted airshed on and from any day if the PM₁₀ standard was not breached in the airshed in the immediately prior 5-year period</p> </div> <p>AND, consequential amendments arising from this submission point.</p>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
6	Receiving environment	32	Oppose	<p>This definition has the same meaning as that provided in Clause 1.4 of the National Policy Statement for Freshwater Management 2020 (NPS-FM 2020). As such, the definition relates to the receiving environment associated with water bodies (both freshwater in the coastal marine area).</p> <p>In the context of broader resource management considerations, the concept of a 'receiving environment' is also applicable to a range of other activities besides discharges to water bodies. Other examples include the receiving environment associated with discharges to air and the attributes and sensitivity of the receiving environment when considering landscape and visual effects of an activity.</p> <p>Given that the PORPS 2021 establishes a policy framework for all regional resource management issues, not just discharges to waterbodies, Ravensdown considers that providing such a narrow definition of 'receiving environment' within the PORPS 2021 is not appropriate.</p>	<p>Delete the definition for 'Receiving environment' in its entirety.</p> <p>has the same meaning as in in clause 1.4 of the National Policy Statement for Freshwater Management 2020 (as set out in the box below)</p> <p>includes, but is not limited to, any water body (such as a river, lake, wetland or aquifer) and the coastal marine area</p> <p>AND, consequential amendments arising from this submission point.</p>
7	Rural area	35	Oppose	<p>Ravensdown supports, in part, the proposed definition of 'urban area' (refer to Sub. Ref. 9 below).</p> <p>However, while supporting the 'urban area' definition, Ravensdown considers that the proposed 'rural area' definition should not be included in the PORPS 2021.</p> <p>Firstly, not all land that is outside of an 'urban area' is rural land or within a rural area. Rural area generally means land that is used for rural activities and that means primary production activities and associated support activities. There are large parts of the Otago region that are outside of an 'urban area' and which are</p>	<p>Delete the definition for 'rural area' in its entirety.</p> <p>means any area of land that is not an urban area</p> <p>AND, consequential amendments arising from this submission point.</p>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
				not used for rural activities (i.e., conservation land etc). Secondly, the general public has an understanding of what constitutes a rural area or rural land. In this context, it is not appropriate to provide a definition within the PORPS 2021, particularly a definition that does not reflect the public's general understanding of a 'rural area'.	
8	Specified infrastructure	35 and 36	Oppose	<p>This definition repeats the definition contained in Clause 3.21 of the NPS-FM 2020. The NPS-FM 2020 definition is then subsequently used in Clause 3.22 (Natural inland wetlands) of the NPS-FM (this clause requires the inclusion of a specific policy within regional plans), where the NES-F 'specific infrastructure' regulations are referred to. The NES-F regulations relate to the construction, maintenance and operations of 'specific infrastructure' in and around 'natural wetlands' (as regulated by Regulations 45 to 47 of the NES-F).</p> <p>As discussed above in relation to the other definitions contained within the NES-F, it is considered that the term 'specified infrastructure' can have a broader meaning than that provided for by the PORPS 2021 definition. Also, 'specified infrastructure' is only used in Policy LF-FW-P9 (Protecting natural wetlands) of the PORPS 2021.</p> <p>Given the potential issues around the broader interpretation of specified infrastructure, and the use of the term within only one policy, rather than defining the term within the PORPS 2021, Ravensdown considers that the definition should be deleted (and the policy amended to refer to the specific regulations in the NES-F).</p>	<p>Delete the definition for 'Specified infrastructure' in its entirety.</p> <p>has the same meaning as in clause 3.21 of the National Policy Statement for Freshwater Management 2020 (as set out in the box below)</p> <p>means any of the following:</p> <ul style="list-style-type: none"> (a) infrastructure that delivers a service operated by a lifeline utility (as defined in the Civil Defence Emergency Management Act 2002), (b) regionally significant infrastructure identified as such in a regional policy statement or regional plan, (c) any public flood control, flood protection, or drainage works carried out: <ul style="list-style-type: none"> (i) by or on behalf of a local authority, including works carried out for the purposes set out in section 133 of the Soil Conservation and Rivers Control Act 1951, or (ii) for the purpose of drainage by drainage districts under the Land Drainage Act 1908

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					AND, consequential amendments arising from this submission point.
9	Urban area	40	Support in part	<p>The National Policy Statement for Urban Development 2020 (NPS-UD 2020) contains a definition for an ‘urban environment’, which relates to an area of land which accommodates, or which intends to accommodate, at least 10,000 people. Given that there are a number of smaller townships in the Otago region that accommodate less than 10,000 people (but which function as an urban area/environment), and given the proposed PORPS 2021 policy framework that relates to ‘urban areas’, the proposed definition is considered to be generally appropriate.</p> <p>However, as it is not uncommon for rural industrial activities to be located within an area of land that is zoned as industrial (i.e., dairy factories, meat processing plants, stores and yards etc), but surrounded by rurally zoned land, Ravensdown considers that amendments to the proposed ‘urban area’ definition are required. On this basis, the definition needs to more clearly articulate that it refers to industrial zones (and potentially commercial and mixed use zones) located in areas that are urban in character.</p>	<p>Amend the definition of ‘urban area’ as follows:</p> <p><i>means any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that is, or is intended to be, predominantly urban in character. This includes but is not limited to any land identified in District Plans as being within any urban growth boundary or equivalent area however described, any residential zone, commercial and mixed use zone, industrial zone where located in areas that are urban in character, and future urban zone as listed in the National Planning Standards or its present District Plan zone equivalent. Urban environments are a subset of urban areas.</i></p>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
10	Waste	40	Oppose	<p>This definition repeats the definition contained in Regulation 3 of the NES-AQ 2004. Therefore, this definition is directly connected to specific activities that are regulated within the NES-AQ, namely the burning of waste within landfills (Regulation 6).</p> <p>Waste is generated from a range of activities, and includes liquid and solid wastes or wastes from a range of specific activities. The proposed PORPS 2021 'waste' definition, which just refers to waste disposal (in the context of waste material within a landfill), is too narrow. Ravensdown considers that if a definition of waste is to be retained in the POROP 2021, the definition contained in the Waste Minimisation Act 2008 would be more appropriate.</p>	<p>Amend the definition for 'Waste' as follows:</p> <p>has the same meaning as in regulation 3 of the Resource Management (National Environmental Standards for Air Quality) Regulations 2004 (as set out in the box below)</p> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>means substances or objects that are disposed of or intended to be disposed of</p> </div> <p><u>(a) means anything disposed of or discarded; and</u></p> <p><u>(b) includes a type of waste that is defined by its composition or source (for example, organic waste, electronic waste, or construction and demolition waste); and</u></p> <p><u>(c) to avoid doubt, includes any component or element of diverted material, if the component or element is disposed of or discarded.</u></p>
MW – Mana whenua					
11	Method MW-M1 – Collaboration with Kāi Tahu	61	Support in part	<p>Identification and mapping of areas and values of significance to Kāi Tahu, and providing for the protection of such areas and/or values, is supported by Ravensdown. The identification of such areas, in a manner where all resource users can identify where these areas are and understand their significance, is helpful for all parties. It is for this reason that this method is supported.</p> <p>However, while it is also important that outstanding natural features, landscapes and seascapes are also identified and mapped, this process is provided for in Method NFL-M1 of the PORPS 2021. For this reason,</p>	<p>Amend Method MW-M1 as follows:</p> <p><i>Local authorities must collaborate with Kāi Tahu to:</i></p> <p><i>(1) identify and map places, areas or landscapes of cultural, spiritual or traditional significance to them,</i></p> <p><i>(2) protect such places, areas, or landscapes, and the values that contribute to their significance, <u>and</u></i></p> <p><i>(3) identify indigenous species and ecosystems that are taaka in accordance with ECO-M3,</i></p>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
				<p>Ravensdown down considers that clause (4) of the method should not be included in this specific method. Other methods and requirements of the PORPS 2021 will ensure that councils will work with Kāi Tahu in identifying the areas to be identified under Method NFL-M1. These other methods and requirements include Methods MW-M2 and MW-M3 as well as APP9.</p> <p>Finally, as noted above (Sub. Ref. 2), Ravensdown also opposes the proposed inclusion of ‘highly valued natural features and landscapes’ in the PORPS 2021, in the manner proposed, and has requested the deletion of this concept.</p>	<p>and.</p> <p>(4) identify and map outstanding natural features, landscapes and seascapes, and highly valued natural features, landscapes and seascapes and record their values.</p>
PART 2 – RESOURCE MANAGEMENT OVERVIEW					
IM – Integrated Management					
12	Objective IM-O1 - Long term vision	96	Support in part	<p>This objective sets out the long term vision for the management of the region’s natural and physical resources, by and for the people of Otago. The vision seeks to ensure that the region’s resources are healthy, resilient, natural systems and ecosystem services are safeguarded and that the well-being of present and future generations are supported.</p> <p>Ravensdown considers that as a long term vision, this objective is appropriate and for this reason the objective is supported.</p> <p>While supporting the objective, Ravensdown considers that the objective does not need to refer to resource management plans and decision making. This direction is not necessary, and even if it is considered appropriate, such direction should sit within a policy, not an objective.</p>	<p>Amend Objective IM-O1 as follows:</p> <p><i>The management of natural and physical resources in Otago, by and for the people of Otago, including Kāi Tahu, and as expressed in all resource management plans and decision making, achieves healthy, resilient, and safeguarded natural systems, and the ecosystem services they offer, and supports the well-being of present and future generations, mō tātou, ā, mō kā uri ā muri ake nei.</i></p>

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13	Objective IM-O2 - Ki uta ki tai	96	Support in part	<p>This objective seeks to ensure that ki uta ki tai, the interconnectedness of systems and resources, is recognised and embraced in the region.</p> <p>Ravensdown agrees that the environment is an interconnected system and therefore ki uta ki tai should be recognised and embraced. For this reason, this objective is supported.</p> <p>However, similar to the issue raised in relation to Objective IM-O1 above (Sub. Ref. 12), the objective does not need to refer to resource management and decision making. This direction is not necessary, and even if it is considered appropriate, such direction should sit within a policy, not an objective.</p>	<p>Amend Objective IM-O2 as follows</p> <p>Natural and physical resource management and decision making in Otago embraces ki uta ki tai, recognising that the environment is an interconnected system, which depends on its connections to flourish, and must be considered as an interdependent whole.</p>
14	Objective IM-O3 - Environmentally sustainable impact	96	Oppose	<p>This 'integrated management' objective, as proposed, seeks to ensure that resource use activities are carried out in a manner that preserves environmental integrity, form, function and resilience so that the life-supporting capacities of air, water, soil, ecosystems and indigenous biodiversity endures for future generations.</p> <p>While Ravensdown understands the intent of this objective, Ravensdown considers that objective introduces concepts and terms that do not reflect the purpose of the RMA, as contained in section 5 of the RMA. As the PORPS 2021 is a statutory planning document under the RMA, the objective needs to be consistent with the purpose of the RMA. Ravensdown has therefore requested amendments to the objective that are consistent with section 5 of the RMA.</p> <p>The requested amendments also remove the reference to indigenous biodiversity as this is part of providing for the life-supporting capacity of ecosystems.</p>	<p>Amend Objective IM-O3 as follows:</p> <p>Otago's communities carry out their activities in a way that sustainably manages natural and physical resources preserves environmental integrity, form, function, and resilience, so that the life-supporting capacities of air, water, soil, ecosystems is safeguarded, and indigenous biodiversity endure for future generations.</p>

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15	Objective IM-O4 - Climate change	96	Support in part	<p>This objective seeks to ensure that Otago’s communities understand what climate change will mean into the future, including the adaption and mitigation actions that may be required, including to align with national level responses.</p> <p>Ravensdown considers that this objective, in the context of what can be achieved under the RMA and associated statutory planning documents, is generally appropriate. For this reason, Ravensdown supports this objective.</p> <p>However, similar to the issues raised in relation to Objectives IM-O1 and IM-O2 above (Sub. Ref. 12 and 13), the objective does not need to refer to the outcomes sought by the PORPS 2021. This direction is not necessary.</p>	<p>Amend Objective IM-O4 as follows:</p> <p><i>Otago’s communities, including Kāi Tahu, understand what climate change means for their future, and climate change responses in the region, including adaptation and mitigation actions, are aligned with national level climate change responses and are recognised as integral to achieving the outcomes sought by this RPS.</i></p>
16	Policy IM-P1 – Integrated approach	96	Oppose	<p>This policy seeks to establish an overarching integrated management framework that guides, or instructs, the PORPS 2021.</p> <p>Ravensdown considers that this policy is not actually a policy and is more akin to guidance and is therefore unnecessary and should be deleted. This form of guidance is not needed and adds nothing to the PORPS 2021.</p>	<p>Delete Policy IM-P1 in its entirety.</p> <p>The objectives and policies in this RPS form an integrated package, in which:</p> <p>(1) all activities are carried out within the environmental constraints of this RPS,</p> <p>(2) all provisions relevant to an issue or decision must be considered,</p> <p>(3) if multiple provisions are relevant, they must be considered together and applied according to the terms in which they are expressed, and</p> <p>(4) notwithstanding the above, all provisions must be interpreted and applied to achieve the integrated management objectives IM-O1 to IM-O4</p>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
17	Policy IM-P2 – Decision priorities	97	Oppose	While Ravensdown understands the intent of this policy (which reflects the concept of Te Mana o te Wai as contained in the NPS-FM 2020), Ravensdown considers that the policy introduces concepts and terms that do not reflect the purpose of the RMA, as contained in section 5 of the RMA. As the PORPS 2021 is a statutory planning document under the RMA, the policy needs to be consistent with the purpose of the RMA. In addition, all decision making needs to achieve the purpose of the RMA, not one specific policy contained in a regional policy statement. For these reasons, Ravensdown requests the deletion of this policy.	Delete Policy IM-P2 in its entirety. Unless expressly stated otherwise, all decision making under this RPS shall: (1) firstly, secure the long term life supporting capacity and mauri of the natural environment, (2) secondly, promote the health needs of people, and (3) thirdly, safeguard the ability of people and communities to provide for their social, economic, and cultural well being, now and in the future.
18	Policy IM-P4 – Setting a strategic approach to ecosystem health	97	Support in part	This policy, as proposed, aims to ensure that healthy ecosystems and ecosystem services are achieved in the region, by implementing the measures listed in Parts (1) to (4) of the policy. Ravensdown considers that ensuring that ecosystems and ecosystem services are healthy is an appropriate matter to consider when making decisions under the RMA. For this reason, this policy is generally supported. While supporting the policy, Ravensdown has requested amendments to the policy to address the following issues: - It is not necessary to state ‘through a planning framework’ within this policy. The PORPS 2021 is part of the planning framework and regional and district plans are required, where relevant, to give effect to the PORPS 2021. - While ‘particular regard’ has to be had to ‘intrinsic values of ecosystems’ in accordance with section 7(d) of the RMA, this does not equate to providing	Amend Policy IM-P4 as follows: <i>Healthy ecosystems and ecosystem services are achieved through a planning framework that by:</i> <i>(1) protects recognising their intrinsic values,</i> <i>(2) takesing a long-term strategic approach that recognises changing environments,</i> <i>(3) recognisesing and provides for ecosystem complexity and interconnections, and</i> <i>(4) anticipatesing, or respondsing swiftly to, changes in activities, pressures, and trends.</i>

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				for their protection.	
19	Policy IM-P5 – Managing environmental interconnections	97	Support	<p>This policy, as proposed, aims to ensure that the interconnected nature of natural and physical resources is recognised and provided for, including by implementing the approaches included in Parts (1) to (3) of the policy.</p> <p>As stated above in relation to Objective IM-O2 (Sub. Ref. 12), Ravensdown agrees that natural and physical resources are interconnected and therefore this fact, where relevant, should be recognised and provided for. For this reason, this objective is supported.</p>	Retain Policy IM-P5 as notified.
20	Policy IM-P8 – Climate change impacts	98	Support	<p>This policy, as proposed, aims to ensure that climate change processes and risks in the Otago region are recognised and provided for, by identifying the potential climate change impacts now and into the future. The policy then identifies that potential climate change impacts will be accommodated in all relevant resource management processes.</p> <p>In the context of what can be achieved under the RMA and associated statutory planning documents, Ravensdown agrees that it is necessary to recognise and provide for climate change processes, risks and impacts, within the Otago region.</p>	Retain Policy IM-P8 as notified.
21	Policy IM-P9 – Community response to climate change impacts	98	Support	<p>This policy seeks to ensure that, by 2030, Otago’s communities have established responses to adapt to the impacts of climate change.</p> <p>While considering that 2030 may be challenging, particularly in terms of establishing adaption responses, Ravensdown considers that this policy, in the context of what can be achieved under the RMA and associated statutory planning documents, is aspirational and</p>	Retain Policy IM-P9 as notified.

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				therefore generally appropriate. For this reason, Ravensdown supports this policy.	
22	Policy IM-P10 – Climate change adaptation and mitigation	98	Support	<p>This policy aims to identify and implement climate change adaption and mitigation methods that: minimise the effects of climate change on existing activities (Part (1)); prioritise avoiding the establishment of new activities subject to risks from climate change, unless the new activity reduces or is resilient to those risks (Part (2)); and, provides the people of Otago with the best chance to thrive, even under extreme climate change scenarios (Part (3)).</p> <p>Ravensdown considers that this policy, in the context of what can be achieved under the RMA and associated statutory planning documents in terms of identifying and implementing climate change adaption and mitigation methods, reflects an appropriate resource management approach. In particular, given the presence of the Dunedin Works alongside Otago Harbour, the aim of minimising effects of climate change on existing activities is considered important to Ravensdown. For these reasons, Ravensdown supports this policy.</p>	Retain Policy IM-P10 as notified.
23	Policy IM-P13 – Managing cumulative effects	99	Oppose	<p>This policy, as proposed, aims to ensure the environmental integrity, form, function, resilience, and opportunities for future generations, are protected by assessing cumulative effects of activities as part of resource management processes.</p> <p>Ravensdown considers that this policy is not needed and should be deleted. The first part of this policy repeats the intent of Objective IM-O3 (refer to Sub. Ref. 14) and therefore is not needed. The second part of the policy</p>	<p>Delete Policy IM-P13 in its entirety.</p> <p><i>Otago's environmental integrity, form, function, and resilience, and opportunities for future generations, are protected by recognising and specifically managing the cumulative effects of activities on natural and physical resources in plans and explicitly accounting for these effects in other resource management decisions</i></p>

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				specifies that cumulative effects must be assessed. This is a requirement of the RMA and therefore does not need to be repeated within this policy (i.e., under section 3 (Meaning of effect) of the RMA the term 'effect' includes cumulative effects).	
24	Policy IM-P15 – Precautionary approach	99	Oppose	<p>This policy aims to adopt a precautionary approach where the effects of activities are uncertain, unknown or little understood but could have a significant adverse effect. The policy also aims to apply the precautionary approach where areas and values have not been identified in plans.</p> <p>The adoption of the precautionary approach as outlined in this policy, except for where areas and values are not identified in statutory planning documents, is supported by Ravensdown. The precautionary approach is a concept adopted throughout New Zealand in the circumstances described in the first half of policy. For this reason, the first part of the policy is supported.</p> <p>However, Ravensdown opposes applying the precautionary approach in circumstances where areas and values have not yet been identified in a statutory planning document. It is not appropriate to unduly restrict resource users due to the tardiness of councils, especially given that areas and values of significance could have been identified in planning documents developed over the past 30 years (i.e., since the enactment of the RMA).</p>	<p>Amend Policy IM-P15 as follows:</p> <p><i>Adopt a precautionary approach towards proposed activities whose effects are uncertain, unknown or little understood, but could be significantly adverse, particularly where the areas and values within Otago have not been identified in plans as required by this RPS.</i></p>
25	Method IM-M3 – Identification of climate change impacts and	100	Support	This method identifies that the Otago Regional Council, by December 2025, is to identify the types and locations of climate change impact in the region by undertaking a risk assessment. Guidance is then to be developed to	Retain Method IM-M3 as notified.

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	community guidance			support communities to be prepared and resilient. It is important that the locations and nature of climate change impact risks are identified, mapped and/or communicated to the public, as soon as possible. This is particularly important if there are implications for existing activities and future development in the region. For these reasons, Ravensdown supports this method.	
26	Method IM-M4 – Climate change response	100 and 101	Support	This method identifies that all local authorities, in partnership with each other and Kāi Tahu and in consultation with the community, develop climate change responses that achieve climate change adaption and mitigation. The identification of potential climate change responses, with the community, is appropriate. For this reason, Ravensdown supports this method.	Retain Method IM-M4 as notified.
PART 3 – DOMAINS AND TOPICS					
<i>Domains / AIR - Air</i>					
27	Objective AIR-O1 – Ambient air quality	103	Support	Ravensdown considers that it is important that the region’s ambient air quality complies with relevant standards and guidelines such that it does provide for people’s health and well-being, amenity and mana whenua values, as well as the life-supporting capacity of ecosystems. For this reason, Ravensdown supports this objective.	Retain Objective AIR-O1 as notified.
28	Objective AIR-O2 – Discharges to air	103	Support in part	This objective, as proposed, aims to protect human health, amenity and mana whenua values, and the life-supporting capacity of ecosystems from the adverse effects of discharges to air. While Ravensdown agrees with the intent of the objective, it is considered that the objective largely	Amend Objective AIR-O2 as follows: <i>Provide for discharges to air whilst ensuring their effects on human health, amenity and mana whenua values and the life-supporting capacity of ecosystems are appropriately managed protected from the adverse effects of discharges to air.</i>

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				repeats Objective AIR-O1 and also inappropriately provides for protection from adverse effects, rather than ensuring that adverse effects from discharges to air are avoided, remedied or mitigated. To address these issues, Ravensdown requests amendments to the objective that focuses on providing for discharges to air in a manner that ensures that adverse effects, on the listed values, from discharges to air, are appropriately managed.	
29	Policy AIR-P1 – Maintain good ambient air quality	103	Support in part	<p>This policy, as proposed, aims to maintain ‘good’ ambient air quality in the region, by ensuring discharges to air comply with ‘limits’ or otherwise that the adverse effects on ambient air quality are no more than minor.</p> <p>This policy introduces concepts that are not used in New Zealand when managing ambient air quality and discharges to air in accordance with the RMA.</p> <p>Firstly, rather than requiring ‘good’ ambient air quality to be maintained, the approach adopted in New Zealand is to require the maintenance of ambient air quality where relevant standards are complied with. This policy should just reflect this fact.</p> <p>Secondly, ambient air quality standards for New Zealand’s key contaminants of concern are contained in the NES-AQ 2004, and will also be contained in any updates to this national environmental standard. In addition, for other contaminants, there are a range of international guidelines that are used by air quality specialists when considering the effect of an activity or activities (i.e., guidelines provide guidance and thus absolute compliance is not always appropriate). On this basis, the development of new regional ‘limits’ within</p>	<p>Amend Policy AIR-P1 as follows:</p> <p>AIR-P1 – Maintain good ambient air quality Good ambient air quality is maintained across Otago, where ambient air quality standards are complied with, by:</p> <p>(1) ensuring discharges to air comply with ambient air quality standards or relevant guidelines limits where those limits have been set, and</p> <p>(2) where limits have not been set, only allowing discharges to air if the adverse effects on ambient air quality are avoided, remedied or mitigated no more than minor.</p>

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				<p>regional plans is not appropriate, or required.</p> <p>Finally, the concept of requiring discharges to air to have no more than minor effects in circumstances where there is no 'limit' is not logical (i.e., 'no more than minor', under the RMA, is only relevant to notification considerations and the gateway tests for non-complying activities). Rather, in order to maintain ambient air quality in areas (airsheds), where ambient air quality standards are complied with, discharges to air should be required to avoid, remedy or mitigate adverse effects on ambient air quality.</p> <p>Ravensdown has requested amendments to the policy to address the issues raised within this submission point.</p>	
30	Policy AIR-P2 – Improve poor ambient air quality	103	Support in part	<p>This policy, as proposed, aims to improve 'poor' ambient air quality in the region through a range of mechanisms, including those outlined in Parts (1) and (2) of the policy.</p> <p>Similar to Policy AIR-P1 above (Sub. Ref. 29), this policy introduces concepts that are not used in New Zealand when managing ambient air quality and discharges to air in accordance with the RMA.</p> <p>Firstly, rather than requiring the improvement of 'poor' ambient air quality, the approach adopted in New Zealand is to require the improvement of ambient air quality where relevant standards are not complied with. In these circumstances, the state of the ambient air quality is referred to as degraded.</p> <p>Secondly, as outlined above in relation Policy AIR-P1 above, standards for the management of key contaminants of concern are already provided within</p>	<p>Amend Policy AIR-P2 as follows:</p> <p>AIR-P2 – Improve poor degraded ambient air quality</p> <p>Poor <u>Degraded ambient air quality, where ambient air quality standards are not complied with, is improved across Otago including by:</u></p> <p>(1) establishing, maintaining and enforcing plan provisions that set limits and timeframes for improving ambient air quality, including by managing discharges to air so that the discharge of contaminants that contribute to the degradation are minimised,</p> <p>(2) managing the spatial distribution of activities and transport, and</p> <p>(3) prioritising actions to reduce PM₁₀ and PM_{2.5} concentrations in polluted airsheds, including phasing out existing domestic solid fuel burning appliances and preventing any</p>

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				<p>the NES-AQ 2004 (and will also be contained in the amended national environmental standard), and therefore the establishment of regional 'limits' is not appropriate. In order to improve ambient air quality, Ravensdown considers that discharges to air will need to be appropriately managed where the discharge of contaminants that contribute to the degradation are minimised within the relevant airshed.</p> <p>Finally, the last part of this policy is not applicable, as since 2005 the NES-AQ 2004 has specified the requirements for domestic solid fuel burning appliances (i.e., those that can and cannot be installed). Thus, since 2005, all new domestic solid fuel burning appliances that have been installed in New Zealand should be compliance with the NES-AQ 2004.</p> <p>Ravensdown has requested amendments to the policy to address the issues raised within this submission point.</p>	<p>discharges from new domestic solid fuel burning appliances that do not comply with the standards set in the NESAQ.</p>
31	Policy AIR-P3 – Providing for discharges to air	104	Support in part	<p>This policy, as proposed, aims to allow discharges to air provided human health, amenity and mana whenua values, and the life-supporting capacity of ecosystems are not adversely affected.</p> <p>While Ravensdown supports the intent of the policy, given amendments requested to Objective AIR-O2 (Sub. Ref. 28), similar amendments are also required to this policy. This is because this policy is required to give effect, in part, to this objective and therefore the same terminology should be used (i.e., 'provide for and manage' rather than 'allow').</p> <p>In addition, it is noted that the term 'allow' infers permitted activity status for activities. Ravensdown</p>	<p>Amend Policy AIR-P3 as follows:</p> <p>Allow <u>Provide for and manage</u> discharges to air provided they do not adversely affect <u>to ensure that</u> human health, amenity and mana whenua values and the life supporting capacity of ecosystems are not adversely affected.</p>

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				considers that this is not appropriate for all discharges to air within the region.	
32	Policy AIR-P4 – Avoiding certain discharges	104	Support in part	<p>This policy, as proposed, seeks to avoid discharges that cause offensive, objectionable, noxious or dangerous effects.</p> <p>While the intent of the policy is supported, Ravensdown considers that amendments are required to address two specific issues.</p> <p>Firstly, the policy needs to articulate that it refers to the listed effects not occurring beyond the boundary of the property of origin.</p> <p>Secondly, the use of the term ‘avoid’ within a policy, can be problematic as it infers prohibited activity status for such activities. Therefore amendments, that do not change the intent of the policy but which address the issue associated with ‘avoid’, are requested by Ravensdown.</p>	<p>Amend Policy AIR-P4 as follows:</p> <p>AIR-P4 – Avoiding-Restricting certain discharges Avoid <u>Ensure</u> discharges to air that do not cause offensive, objectionable, noxious or dangerous effects <u>beyond the boundary of the property of origin.</u></p>
33	Policy AIR-P5 – Managing certain discharges	104	Support in part	<p>This policy identifies that the effects of discharges, beyond property boundaries, are to be managed. The policy then identifies that this applies to a range of activities, including industrial and trade activities.</p> <p>The management of discharges to air, including effects of such discharges, from a range of activities, including industrial and trade activities, is appropriate and therefore supported by Ravensdown.</p> <p>However, the policy as drafted, infers that the discharges beyond the property of origin is where management of the discharge, under the RMA, will occur. This is not how discharges to air are managed under the RMA, nor is it anticipated that this is what is meant. An amendment to address this issue is</p>	<p>Amend Policy AIR-P5 as follows:</p> <p><i>Manage the effects of discharges to air beyond the boundary of the property of origin from activities that include but are not limited to:</i></p> <ol style="list-style-type: none"> (1) outdoor burning of organic material, (2) agrichemical and fertiliser spraying, (3) farming activities, (4) activities that produce dust, and (5) industrial and trade activities.

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				therefore requested by Ravensdown.	
34	Policy AIR-P6 – Impacts on mana whenua values	104	Support in part	<p>This policy, as proposed, aims to avoid discharges to air that adversely affect mana whenua values.</p> <p>As discussed above in relation to Policy AIR-P4 (Sub. Ref. 32), the use of the term ‘avoid’ within RMA policies is problematic as it infers prohibited activity status. Given that this policy identifies that ‘particular regard’ to the values and areas of significance to mana whenua will be considered, it is clear that ‘prohibited activity’ status is not required in order to give effect to this policy. Therefore amendments, that do not change the intent of the policy but which address the issue associated with ‘avoid’, are requested by Ravensdown.</p>	<p>Amend Policy AIR-P6 as follows:</p> <p>Avoid <i>Ensure that discharges to air that do not adversely affect mana whenua values by having particular regard to values and areas of significance to mana whenua.</i></p>
35	Method AIR-M2 – Regional plans	104 and 105	Oppose	<p>Ravensdown has requested amendments to Objective AIR-O2 and to a number of the policies contained in the AIR chapter of the PORPS 2021 (refer above to Sub. Ref. 28 to 34). Given these requested amendments, subsequent amendments to this method are required in Parts (1) and (2) to reflect the amendments to the relevant provisions of the PORPS 2021 that are accommodated within this method.</p> <p>In addition to the amendments to Parts (1) and (2), Ravensdown considers that Parts (4) and (5) of this method need to be deleted for the following reasons:</p> <ul style="list-style-type: none"> - Part (4) of the method specifies that the adverse effects of discharges to air in polluted airsheds will be mitigated where the discharge adversely affects the polluted airshed. Firstly, this matter is not included in the AIR chapter objectives and policies. - Part (5) of the method specifies that the regional plan must give effect to the Air Quality Strategy for 	<p>Amend Method AIR-M2 as follows:</p> <p><i>No later than 31 December 2024, Otago Regional Council must prepare or amend and maintain its regional plans to:</i></p> <ol style="list-style-type: none"> (1) avoid ensure <i>offensive, objectionable, noxious or dangerous discharges to air beyond the property of origin do not occur,</i> (2) <i>include provisions to mitigate manage the adverse effects from discharges to air beyond the boundary of the property of origin, and</i> (3) <i>implement the prioritisation of actions set out in AIR-P2,</i> (4) mitigate the adverse effects of discharges to air in areas adjacent to polluted airsheds where the discharge will adversely affect air quality in the polluted airshed, and (5) give effect to the Air Quality Strategy for Otago and any subsequent amendments or

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				Otago. Ravensdown considers that this is not appropriate as the strategy is not a statutory planning document prepared in accordance with the requirements of the RMA. As such, public input, in accordance with Schedule 1 of the RMA, has not occurred.	updates.
Domains / CE – Coastal Environment					
36	Objective CE–O1 – Safeguarding the coastal environment	108	Support	<p>This objective aims to safeguard the integrity, form, function and resilience of Otago’s coastal environment, so that water quality, ecological biodiversity, physical processes and surf breaks are protected or maintained, and where these values are degraded they are restored or enhanced.</p> <p>As this objective reflects Objective 1, as well as Policy 16 (Surf breaks of national significance), of the New Zealand Coastal Policy Statement 2010 (NZCPS), Ravensdown supports this objective.</p>	Retain Objective CE-O1 as notified.
37	Objective CE–O2 – Maintaining or enhancing highly valued areas of the coastal environment	108	Support in part	<p>This objective aims to ensure that specific values which are associated the coastal environment are maintained or enhanced. The values include public access, recreation opportunities and ‘highly valued natural features and landscapes.</p> <p>Ravensdown supports the maintenance and enhancement of public access opportunities (and recreation opportunities) in the coastal environment, as this is consistent with section 6(d) of the RMA.</p> <p>However, Ravensdown has requested the deletion of the definition of ‘highly valued natural features and landscapes’ (Sub. Ref. 2) given that this concept does not reflect sections 7(c) and (f) of the RMA, as stated within the proposed definition. Rather section 7(c)</p>	<p>Amend Objective CE-O2 as follows:</p> <p>CE–O2 – Maintaining or enhancing highly valued areas of the coastal environment <i>Public access, recreation opportunities, and highly valued natural features and landscapes amenity values in the coastal environment are maintained or enhanced.</i></p>

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				relates to amenity values and section 7(f) relates to the quality of the environment. On this basis, Ravensdown considers this objective should refer to the maintenance and enhancement of amenity values, not 'highly valued natural features and landscapes'.	
38	Objective CE-O5 – Activities in the coastal environment	108	Support	<p>This objective aims to provide for activities within the coastal environment provided: space is used efficiently; activities are compatible with their location; activities are located within appropriate locations; and, provided public access is maintained or enhanced.</p> <p>Ravensdown's Dunedin Works is located alongside Otago Harbour, with activities at the site including the use of the Ravensbourne wharf which is located over the coastal marine area. The site is an existing industrial activity that uses the site efficiently, is of a scale that is compatible with the area's industrial zoning and long-term use of the site. The site's activities also do not restrict public access to the coastal marine area. For these reasons, Ravensdown supports this objective.</p>	Retain Objective CE-O5 as notified.
39	Policy CE-P1 – Links with other chapters	109	Oppose	<p>This proposed policy provides administrative guidance on the interrelationship between provisions in this section of the PORPS 2021 and provisions contained in the other chapters of the PROPS 2021.</p> <p>As this policy does not provide any specific guidance of relevance to resource management processes, and given that the other policies referred to are self-explanatory, Ravensdown considers that this proposed policy is not needed and should be deleted.</p>	<p>Delete Policy CE-P1 in its entirety.</p> <p><i>Recognise that:</i></p> <p>(1) coastal hazards must be identified in accordance with CE-P2(4) and managed in accordance with the HAZ-NH – Natural hazards section of this RPS;</p> <p>(2) port activities must be managed in accordance with the TRAN – Transport section of this RPS; and</p> <p>(3) historic heritage must be managed in accordance with the HCV – Historical and cultural values section of this RPS.</p>

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40	Policy CE-P2 – Identification	109	Support	<p>This policy identifies that a range of values and areas within the Otago’s coastal environment need to be identified, including: the extent of the coastal environment and the range of values associated with the identified environment; areas where water quality is degraded and is having a significant adverse effect on values associated with areas of the coastal environment; areas potentially affected by coastal hazards; and, the extent of the nationally significant surf breaks.</p> <p>To be able to make informed resource management decisions in the future, whether as part of the development of statutory planning documents or resource consent applications, Ravensdown agrees that such areas and values should be identified (as well as mapped and/or included in scheduled). Given the location of the Dunedin Works alongside the coastal marine area, Ravensdown also considers that it is important to know where such areas lie in relation to its site, particularly the extent of the coastal environment and the areas that will be potentially affected by coastal hazards. For these reasons, Ravensdown supports this policy.</p>	Retain Policy CE-P2 as notified.
41	Policy CE-P3 – Coastal water quality	110	Support	<p>This policy aims to improve coastal water quality where it is deteriorated as identified, it is assumed, in Policy CE-P2(2) (i.e., the notified policy incorrectly refers to Policy CE-P1). The policy also seeks to maintain or enhance water quality to provide for the various values listed in Parts (1) to (4) of the policy.</p> <p>Ravensdown supports the aim of the policy to improve water quality where it is identified as degraded, and to otherwise maintain to improve coastal water quality in</p>	<p>Amend Policy CE-P3 as follows:</p> <p><i>Coastal water quality is improved where it is considered to have deteriorated to the extent described within CE-P12(2), and otherwise managed, so that: ...</i></p>

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				order to provide for the values listed within the policy.	
42	Policy CE-P8 – Public access	112	Support	<p>This policy aims to maintain or enhance public access along the coastal marine area, unless restricting public access is appropriate for the reasons listed in Parts (1) to (8). Some of the exceptions provided for under this policy include protecting public health and safety, providing for temporary activities and to provide for a level of security consistent with operational requirements for established activities.</p> <p>The Dunedin Works site is located alongside the coastal marine area, with a pathway/cycleway that provides public access to the coastal marina area running between the site and the harbour. Ravensdown, under normal operations, does not restrict public access along the pathway/cycleway, but there may be occasions (i.e., during construction activities at the site) that access may need to be restricted temporarily in order to ensure the public's health and safety is provided for. For these reasons, Ravensdown supports this policy.</p>	Retain Policy CE-P8 as notified.
43	Policy CE-P9 – Activities on land within the coastal environment	112	Support	<p>This policy, as proposed, aims to ensure that land use development within the coastal environment occurs in a strategic and co-ordinated manner. This includes, but is not limited to, considering activities maintain the character of the existing built environment (Part (4) of the policy).</p> <p>The Dunedin Works site is an existing industrial activity, located in an industrial zone and located alongside the coastal marine area. The site, depending on the mapping that is yet to occur, is likely to be located within the coastal environment. In this context, providing for ongoing industrial development at the</p>	Retain Policy CE-P9 as notified.

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				Ravensbourne site (which is consistent with the existing build environment), as potentially provided for by Part (4) of this policy, is supported by Ravensdown.	
44	Policy CE-P10 – Activities within the coastal marine area	112 and 113	Support	<p>This policy, as proposed, aim to provide for the use and development of the coastal marine area, subject to the matters provided in Parts (1) to (4) of the policy. These matters include where there is a functional or operational need to be located in the coastal marine area (Part (3)).</p> <p>The Ravensbourne wharf, which is used by the Dunedin Works to receive and dispatch materials and product, has a functional and operational need to be located in the coastal marine area (i.e., it is ships using the wharf). For this reason, Ravensdown supports this policy, specifically Part (3).</p>	Retain Policy CE-P10 as notified.
45	Method CE-M3 – Regional plans	115 and 116	Support in part	<p>The method, as proposed, generally reflects the intent and aim of the objectives and policies contained in this chapter of the PORPS 2021. For this reason, the method is generally supported.</p> <p>However, Ravensdown considers that amendments to Part (4)(a) of this method require amendment as it introduces concepts that are not provided for within the objectives and policies of the PORPS 2021 and which are outside of the scope of appropriate practice provided for by the RMA. Part (4)(a) of the method seeks to only provide for discharges where a ‘small’ mixing zone is used and provided adverse effects within the mixing zone are minimised. When considering discharges, and associated mixing zones, there is a ‘science’ associated with determining the extent of a mixing zone (i.e., rate of discharge, hydraulic conditions in the receiving</p>	<p>Amend Method CE-M3 as follows:</p> <p><i>Otago Regional Council must prepare or amend and maintain its regional plans no later than 31 December 2028 to:</i></p> <p>(1) ...</p> <p>(4) <i>manage the discharge of contaminants into coastal water by:</i></p> <p>(a) only enabling the use of small mixing zones before the water quality standards need to be met in the receiving environment and minimising adverse effects on the life supporting capacity of water within any mixing zone,</p> <p>(b) ...</p>

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				environment etc) which determines a mixing zone size. In addition, within mixing zones, it is recognised that relevant standards will not be complied with and therefore there may be adverse effects on the life-supporting capacity of water within such zones.	
Domains / LF – Land and freshwater / LF-WAI – Te Mana o te Wai					
46	Policy LF-WAI-P1 – Prioritisation	121	Support	This policy generally reflects the fundamental concept of Te Mana o te Wai, and the associated objective, as contained in the NPS-FM 2020. For this reason, Ravensdown supports this policy.	Retain Policy LF-WAI-P1 as notified.
47	Policy LF-WAI-P3 – Integrated management/ki uta ki tai	122	Support	This policy outlines that matters to be considered and managed in order to provide for the integrated management/ ki uta ki tai of the region’s freshwater and land resources. Ravensdown considers that these matters are appropriately focussed, and for this reason, this policy is supported.	Retain Policy LF-WAI-P3 as notified.
48	Policy LF-WAI-P4 – Giving effect to Te Mana o te Wai	122	Oppose	This proposed policy provides administrative guidance on the interrelationship between provisions in this section of the PORPS 2021 and provisions contained in the other chapters of the PORPS 2021. As this policy does not provide any specific guidance of relevance to resource management processes, and given that the other policies referred to are self-explanatory, Ravensdown considers that this proposed policy is not needed and should be deleted.	Delete Policy LF-WAI-P4 in its entirety. <i>All persons exercising functions and powers under this RPS and all persons who use, develop or protect resources to which this RPS applies must recognise that LF-WAI-P1, LF-WAI-P2 and LF-WAI-P3 are fundamental to upholding Te Mana o te Wai, and must be given effect to when making decisions affecting fresh water, including when interpreting and applying the provisions of the LF chapter.</i>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
<i>Domains / LF – Land and freshwater / LF-VM – Visions and management</i>					
49	Objective LF–VM–O2 – Clutha Mata-au FMU vision	124 and 125	Support in part	<p>This objective outlines the concepts that are to underpin resource management activities in the Clutha Mata-au Freshwater Management Unit (FMU). These include, but are not limited to, ensuring that:</p> <ul style="list-style-type: none"> - in the Dunstan, Manuherikia and Roxburgh rohe, that innovative and sustainable land and water management practices support food production and that discharges of nutrients and other contaminants to water are reduced so that water is safe for human contact (Part (7)(b)(ii)); and, - in the Lower Clutha rohe, that land management practices reduce discharges of nutrients and other contaminants to water so that water is safe for human contact (Part (7)(c)(iii)). <p>While Ravensdown is concerned that these FMU specific concepts have been developed in the absence of the community process required under the National Objectives Framework (NOF) of the NPS-FM 2020, it considers that these concepts may reflect the environmental outcomes decided upon by the community. On this basis, Ravensdown is willing to generally support this objective, while noting that if the NOF process identifies a different set of environmental outcomes, then this will need to take precedent over this objective.</p> <p>Ravensdown also acknowledges, as outlined in Parts (7)(b)(ii) and 7(c)(iii) of the objective, that, in accordance with the principles of ‘good management practices’ (GMP) which is being adopted by New Zealand’s farming activities, there is a need to implement practices that</p>	<p>Amend Objective LF-VM-O2 as follows:</p> <p><i>In the Clutha Mata-au FMU:</i></p> <p>...</p> <p><i>(7) in addition to (1) to (6) above:</i></p> <p>....</p> <p><i>(c) in the Lower Clutha rohe:</i></p> <p>....</p> <p><i>(iii) innovative and sustainable land and water management practices support food production in the area and land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and</i></p> <p>...</p>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
				reduce nutrient discharges, and the discharge of other contaminants. For this reason, except for ensuring consistency of language used, Parts (7)(b)(ii) and (7)(c)(iii) of this policy is specifically supported. In terms of the consistency of language use, Part (7)(c)(iii) should also refer to innovative and sustainable land and water management practices that support food production.	
50	Objective LF-VM-03 – North Otago FMU vision	125	Support in part	<p>Similar to Objective LF-VM-02 above (Sub. Ref. 49), this objective outlines the concepts that are to underpin resource management activities in the North Otago FMU. These include, but are not limited to, ensuring that:</p> <ul style="list-style-type: none"> - that land management practices reduce discharges of nutrients and other contaminants to water so that water is safe for human contact (Part (5)); and - that innovative and sustainable land and water management practices support food production and improve resilience to the effects of climate change (Part (6)). <p>As outlined in relation to Objective LF-VM-02, Ravensdown is willing to generally support this objective, while noting that if the NOF process identifies a different set of environmental outcomes, then this will need to take precedent over this objective.</p> <p>Ravensdown also supports the recognition that innovative and sustainable land and water management practices support food production, as well as the need for farming activities to reduce discharges of nutrients and other contaminants.</p>	Retain as Objective LF-VM-03 as notified.

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
51	Objective LF-VM-04 – Taieri FMU vision	125 and 126	Support in part	<p>Similar to Objective LF-VM-02 above (Sub. Ref. 49), this objective outlines the concepts that are to underpin resource management activities in the Taieri FMU. These include, but are not limited to, ensuring that innovative and sustainable land and water management practices support food production and improve resilience to the effects of climate change (Part (8)).</p> <p>As outlined in relation to Objective LF-VM-02, Ravensdown is willing to generally support this objective, while noting that if the NOF process identifies a different set of environmental outcomes, then this will need to take precedent over this objective.</p> <p>Ravensdown also supports the recognition that innovative and sustainable land and water management practices support food production.</p>	Retain Objective LF-VM-04 as notified.
52	Objective LF-VM-05 – Dunedin & Coast FMU vision	126	Support in part	<p>Similar to Objective LF-VM-02 above (Sub. Ref. 49), this objective outlines the concepts that are to underpin resource management activities in the Dunedin & Coast FMU.</p> <p>As outlined in relation to Objective LF-VM-02, Ravensdown is willing to generally support this objective, while noting that if the NOF process identifies a different set of environmental outcomes, then this will need to take precedent over this objective.</p> <p>However, this objective, when compared to the other FMU objectives discussed above, does not recognise innovative and sustainable land and water management practices that support food production. Ravensdown therefore requests the inclusion of a new Part (6) that recognises the significance for food production activities. The phrasing used in other FMU objectives</p>	<p>Amend Objective LF-VM-05 as follows:</p> <p><i>By 2040 in the Dunedin & Coast FMU:</i></p> <p>...</p> <p>(6) <u>innovative and sustainable land and water management practices support food production in the area and improve resilience to the effects of climate change.</u></p>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
				has been proposed.	
53	Objective LF-VM-O6 – Catlins FMU vision	126	Support in part	<p>Similar to Objective LF-VM-O2 above (Sub. Ref. 49), this objective outlines the concepts that are to underpin resource management activities in the Catlins FMU. These include, but are not limited to, ensuring that water supports opportunities for sustainable food production for future generations (Part (6)).</p> <p>As outlined in relation to Objective LF-VM-O2, Ravensdown is willing to generally support this objective, while noting that if the NOF process identifies a different set of environmental outcomes, then this will need to take precedent over this objective.</p> <p>However, this objective, when compared to the other FMU objectives discussed above, does not recognise innovative and sustainable land and water management practices that support food production. Ravensdown therefore requests the inclusion of a new Part (7) that recognises the significance for food production activities. The phrasing used in other FMU objectives has been proposed.</p>	<p>Amend Objective LF-VM-O6 as follows:</p> <p><i>By 2030 in the Catlins FMU:</i></p> <p>...</p> <p><i>(7) innovative and sustainable land and water management practices support food production in the area and improve resilience to the effects of climate change.</i></p>
54	Objective LF-VM-O7 – Integrated management	126	Oppose	<p>This ‘integrated management’ objective seeks to ensure that the ethic of ki uta ki tai is applied to land and water management in the Otago region.</p> <p>As already stated in relation to Objective IM-O2 and Policy LF-WAI-P3 (Sub. Ref. 13 and 47), Ravensdown supports the recognition and application of ki uta ki tai as part of resource management processes.</p> <p>However, given that Objective IM-O2 and Policy LF-WAI-P3 are already contained in the PORPS 2021, and that they reflect similar requirements, Ravensdown considers that this objective is not needed and can be</p>	<p>Delete to Objective LFVM-O7 in its entirety.</p> <p><i>Land and water management apply the ethic of ki uta ki tai and are managed as integrated natural resources, recognising the connections and interactions between fresh water, land and the coastal environment, and between surface water, groundwater and coastal water.</i></p>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
				deleted.	
Domains / LF – Land and freshwater / LF-FW – Fresh water					
55	Policy LF-FW-P7 – Fresh water	129 and 130	Support in part	<p>This policy, as proposed, identifies that environmental outcomes, attribute states and limits are to be established to ensure that the matters outlined in Parts (1) to (6) of the policy are provided for. The matters identified, and the environmental outcome process articulated in this policy, reflect the NOF process required to undertaken in accordance with the NPS-FM 2020.</p> <p>With one exception, as the policy reflects the NPS-FM 2020 NOF process that is to be carried out in the Otago region, Ravensdown supports the policy.</p> <p>However, the exception relates to the river and lake primary contact outcomes contained in Part (3) of the policy. The percentage targets proposed are higher than those contained in Appendix 3 of the NPS-FM 2020. While these targets may be appropriate across the region and/or for specific FMUs in the future, for the PORPS 2021 to specify these percentages in the absence of community involvement through the NOF process is not appropriate. For this reason, Ravensdown has requested changes to Part (3) of this policy that are consistent with Appendix 3 of the NPS-FM 2020.</p>	<p>Amend Policy LF-FW-P7 as follows:</p> <p><i>Environmental outcomes, attribute states (including target attribute states) and limits ensure that:</i></p> <p>...</p> <p><i>(3) specified rivers and lakes are suitable for primary contact within the following timeframes:</i></p> <p><i>(a) by 2030, 980% of rivers and 98% of lakes, and</i></p> <p><i>(b) by 2040, 990% of rivers and 100% of lakes, and</i></p> <p>...</p>
56	Policy LF-FW-P15 – Stormwater and wastewater discharges	132 and 133	Support in part	<p>This policy, as proposed, aims to minimise the adverse effects of stormwater and wastewater discharges (direct and indirect) on freshwater, through implementing the criteria and approaches outlined in Parts (1) to (3) of the policy.</p> <p>Ravensdown, except for one matter of clarification, generally supports the criteria and approaches outlined</p>	<p>Amend Policy LF-FW-P15 as follows:</p> <p><i>Minimise the adverse effects of direct and indirect discharges of stormwater and wastewater to fresh water by:</i></p> <p>...</p> <p><i>(2) requiring:</i></p>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
				<p>in this policy as they reflect appropriate ‘design’ approaches for such systems.</p> <p>The matter of clarification relates to Part (2)(e) of the policy which seems to infer that stormwater and wastewater discharges must meet applicable water quality standards at the point of discharge. The RMA provides for discharges to meet relevant standards or limits after reasonable mixing, not within the discharge itself. Ravensdown has therefore requested an amendment to Part (3)(e) of this policy to clarify that this is the requirement.</p>	<p>...</p> <p><i>(e) stormwater and wastewater discharges to meet any applicable water quality standards, <u>after reasonable mixing</u>, set for FMUs and/or rohe, and</i></p> <p>...</p>
57	Method LF-FW-M7 – District plans	134	Support	<p>This method outlines the matters that that are to be included new or amended district plans in relation to activities that may affect identified outstanding water bodies, as well as various provisions to require the adoption of water sensitive urban design techniques and to reduce the adverse effects of stormwater discharges.</p> <p>Ravensdown supports this method in relation to the stormwater management matters to be included in new or amended district plans as outlined in Part (4) of the method. Ravensdown considers that the potential mechanisms listed in Part (4) represent some of the best practice approaches to stormwater management.</p>	Retain Method LF-FW-M7 as notified.
Domains / LF – Land and freshwater / LF-LS – Land and soil					
58	Objective LF-LS-O11 – Land and soil	137	Support	<p>This objective seeks to ensure the life-supporting capacity of Otago’s soil resources are safeguarded, and the availability and productive capacity of the region’s highly productive land is available for primary production now and into the future.</p> <p>Ravensdown agrees with the intent of this objective,</p>	Retain Objective LF-LS-O11 as notified.

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
				including that the ability to continue use highly productive land for primary production now and into the future. For this reason, this objective is supported.	
59	Objective LF-LS-O12 – Use of land	137	Support	<p>This objective provides for the use of land, provided soil quality is maintained and the land use contributes to the achievement of the regional environmental outcome for freshwater (which will be identified through the NPS-FM 2020 NOF process that is yet to be completed).</p> <p>Ravensdown considers that providing for the use of land, subject to the requirements identified in this objective, reflects sustainable land use practices. For this reason, this objective is supported.</p>	Retain Objective LF-LS-O12 as notified.
60	Policy LF-LS-P16 – Integrated management	137	Oppose	<p>This ‘integrated management’ policy aims to maintain soil quality, and identifies that to do so it is necessary to recognise that integrated management of land and freshwater resources is required given the interconnections between soil health, vegetative cover and water quality and quantity.</p> <p>As already stated in relation to Objective IM-O2 and Policy LF-WAI-P3 (Sub. Ref. 13 and 47), Ravensdown supports the recognition and application of ki uta ki tai as part of resource management processes.</p> <p>However, given that Objective IM-O2 and Policy LF-WAI-P3 are already contained in the PORPS 2021, and that they reflect similar requirements, as well as the fact that Objective LF-LS-O12 (Sub. Ref. 59) specifically refers to maintaining soil quality and achieving environmental outcomes for freshwater, Ravensdown considers that this policy is not needed and can be deleted.</p>	<p>Delete Policy LF-LS-P16 in its entirety</p> <p>Recognise that maintaining soil quality requires the integrated management of land and freshwater resources including the interconnections between soil health, vegetative cover and water quality and quantity.</p>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
61	Policy LF-LS-P17 – Soil values	137	Support	<p>This policy aims to maintain the mauri, health and productive potential of soils by managing land use activities in a manner that ensures that the biological activity, biodiversity, structure and fertility of the soil is sustained.</p> <p>Ravensdown agrees that maintaining soil and thus the productive potential of the soil, in the manner proposed in the policy, reflects an appropriate resource management approach to this matter. For this reason, this policy is supported.</p>	Retain Policy LF-LS-P17 as notified.
62	Policy LF-LS-P18 – Soil erosion	137	Support	<p>This policy aims to minimise soil erosion, and associated water body sedimentation, that could result from land use activities, by implementing the approaches contained in Parts (1) to (3) of this policy.</p> <p>Ravensdown agrees that minimising soil erosion, and any associated sedimentation, from land use activities, is important. In addition, the approaches identified in Parts (1) to (3) of the policy generally reflect the nature of controls that can be put in place to avoid or minimise the potential for soil erosion. For these reasons, this policy is supported.</p>	Retain Policy LF-LS-P18 as notified.
63	Policy LF-LS-P19 – Highly productive land	137 and 138	Support	<p>This policy aims to maintain the availability and productive capacity of highly productive land by: identifying highly productive land (Part (1)); prioritising primary production land uses on highly productive land (Part (2)); and, managing (restricting) urban development in rural areas (Part (3)).</p> <p>Ravensdown considers that it is important that the region's highly productive land is used to grow New Zealand's food. Therefore, it is important that the location of such land is identified and protected such</p>	Retain Policy LF-LS-P19 as notified.

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
				that its primary use is for food production. For these reasons, Ravensdown supports this policy.	
64	Policy LF-LS-P21 – Land use and fresh water	138	Support in part	<p>This policy aims to improve or maintain water quality or quantity, so that the FMU environmental outcomes are met, by: reducing direct and indirect discharges of contaminants to water from land use activities (Part (1)); and, managing land uses that adversely affect water flows (Part (2)).</p> <p>Maintaining or improving water quality and quantity, where degraded or over-allocated, is consistent with the requirements of the NPS-FM 2020, both pre and post the NOF process. Approaches to achieving this includes managing land use activities as generally outlined in Parts (1) and (2) of this policy. For these reasons, Ravensdown generally supports this policy.</p> <p>While supporting the policy, Ravensdown has requested amendments to address two issues. The first issue is that if water quality is not degraded (i.e., the environment outcomes are met), then the policy driver is to be maintain water quality and therefore the reduction of contaminants in discharges, as sought in Part (1) of the policy, may not be necessary. Secondly, the phrasing at the beginning of the policy is unusual, and therefore amendments to address this matter have been proposed by Ravensdown.</p>	<p>Amend Policy LF-LS-P21 as follows:</p> <p>Achieve the improvement or maintenance of <i>fresh water quantity or quality to meet environmental outcomes set for Freshwater Management Units and/or rohe by:</i></p> <p>(1) <i>reducing, where required, direct and indirect discharges of contaminants to water from the use and development of land, and</i></p> <p>(2) ...</p>
65	Method LF-LS-M11 – Regional plans	138 and 139	Support	<p>This method, which outlines the matters that must be included in regional plans in relation to the region’s land and soil resources, reflects the intent of the objectives and policies contained in this chapter of the PORPS 2021. In addition, Part (1)(a) identifies that the development and implementation of Freshwater Farm</p>	<p>Retain Method LF-LS-M11 as notified.</p>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
				<p>Plans, where these are required by the RMA and any regulations. This provision relates to Part 9A of the RMA, and subsequent regulation that may apply in the Otago region.</p> <p>As Ravensdown has generally supported the land and soil objective and policies (except for the deletion of Policy LF-LS-P16 and minor amendments to Policy LF-LS-P21– refer above to Sub. Ref. 60 and 64), Ravensdown also supports this method.</p>	
Topics / ECO – Ecosystems and indigenous biodiversity					
66	Policy ECO-P3 – Protecting significant natural areas and taoka	143	Oppose	<p>This policy, as proposed, aims to protect significant natural areas, indigenous species and ecosystems that are taoka by: avoiding adverse effects that result in a reduction or loss of such areas and values (Part (1)); then, apply the biodiversity effects management hierarchy provided in Policy ECO-P6 (Part (2)); and, adopting a precautionary approach towards activities in accordance with Policy IM-P15 (Part (3)).</p> <p>As discussed below in relation Policy ECO-P6 below (Sub. Ref. 67), there are inherent difficulties with this policy given the policy driver to avoid adverse effects (and thus prohibit activities that cannot avoid effects).</p> <p>Irrespective of the issues associated with the drafting of the policy, Ravensdown considers that the policy is not needed given the suite of objectives and policies within this chapter of eh PORPS 2021. For this reason, Ravensdown requests the deletion of this policy.</p>	<p>Delete Policy ECO-P3 in its entirety:</p> <p>Except as provided for by ECO-P4 and ECO-P5, protect significant natural areas and indigenous species and ecosystems that are taoka by:</p> <p>(1) avoiding adverse effects that result in:</p> <p>(a) any reduction of the area or values (even if those values are not themselves significant) identified under ECO-P2(1), or</p> <p>(b) any loss of Kāi Tahu values, and</p> <p>(2) after (1), applying the biodiversity effects management hierarchy in ECO-P6, and</p> <p>(3) prior to significant natural areas and indigenous species and ecosystems that are taoka being identified in accordance with ECO-P2, adopt a precautionary approach towards activities in accordance with IM-P15.</p>
67	Policy ECO-P6 – Maintaining indigenous biodiversity	144	Oppose	<p>This policy, as proposed, aims to maintain Otago's indigenous biodiversity, excluding the coastal environment and in areas managed under Policy ECO-P3, by applying a biodiversity effects management</p>	<p>Amend Policy ECO-P6 as follows:</p> <p>Maintain Otago's indigenous biodiversity (excluding the coastal environment and areas managed under ECO-P3) by applying the</p>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
				<p>hierarchy, as outlined in Parts (1) to (5) of this policy.</p> <p>Ravensdown opposes this policy, as proposed, as there is an inherent difficulty with the current drafting. The difficulty is that in circumstances where avoiding adverse effects is required, as a priority as, stated in Part (1) of this policy, then the policy driver is to prohibit such activities. Therefore, Part (1) of the policy means that there is no ability, under this policy, to then move into the 'biodiversity effects management hierarchy' as indicated by the policy.</p> <p>A second issue is that the policy has changed the commonly understood effects management hierarchy under the RMA, as now provided in Clause 3.21(1) of the NPS-FM 2020.</p> <p>Given these issues, Ravensdown requests amendments to this policy so that it reflects the effects management hierarchy under the RMA.</p>	<p><i>following biodiversity effects management hierarchy in decision-making on applications for resource consent and notices of requirement:</i></p> <p>(1) <i>avoid adverse effects where practicable as the first priority,</i></p> <p>(2) <i>where adverse effects demonstrably cannot be completely avoided, they are <u>minimised where practicable remedied,</u></i></p> <p>(3) <i>where adverse effects demonstrably cannot be minimised completely avoided or remedied, they are <u>remedied where practicable mitigated,</u></i></p> <p>(4) <i>where there are <u>more than minor residual adverse effects that cannot be avoided, minimised, or remedied, after avoidance, remediation, and mitigation,</u> then the residual adverse effects are offset, <u>where possible,</u> in accordance with APP3, and</i></p> <p>(5) <i>if biodiversity offsetting of <u>more than minor residual adverse effects</u> is not possible, then:</i></p> <p>(a) <i>the residual adverse effects are compensated for in accordance with APP4, and</i></p> <p>(b) <i>if the residual adverse effects cannot be compensated for in accordance with APP4, the activity is avoided.</i></p>
68	Policy ECO-P7 – Coastal indigenous biodiversity	144	Oppose	<p>This proposed policy provides administrative guidance on the interrelationship between provisions in this section of the PORPS 2021 and provisions contained in the Coastal Environment section of the PROPS 2021.</p> <p>As this policy does not provide any specific guidance of</p>	<p>Delete Policy ECO-P7 in its entirety.</p> <p>Coastal indigenous biodiversity is managed by CE P5, and implementation of CE P5 also contributes to achieving ECO-O1.</p>

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				relevance to resource management processes, and given that Policy CE-P5 is self-explanatory, Ravensdown considers that this proposed policy is not needed and should be deleted.	
Topics / EIT – Energy, infrastructure and transport / EIT-EN - Energy					
69	Objective EIT–EN–03 – Energy use	151	Support	This objective aims to ensure that development facilitates efficient energy use and demand, and also ensures that greenhouse gas emissions are minimised. Ravensdown supports this objective.	Retain Objective EIT-EN-03 as notified.
70	Policy EIT–EN–P5 – Non-renewable energy generation	152	Support in part	<p>This policy, as proposed, aims to avoid the development of non-renewable energy generation and facilitate the replacement of non-renewable energy generation in the region.</p> <p>Ravensdown acknowledges that reducing non-renewable energy generation as a means of minimising greenhouse gas emissions contributions from the region is important (as provided for by Objective EIT-EN-03 – refer to Sub. Ref. 69 above). In fact, Ravensdown has been and will continue to assess options for reducing its greenhouse gas emissions from its sites throughout the country, including at the Dunedin Works.</p> <p>The Dunedin Works uses waste heat as part of its sulphuric acid plant operations. This form of energy is a renewable form of energy. However, on plant start-up only, diesel is currently used as a fuel source. Although other fuel sources are continually being assessed, to date no alternatives to use of diesel have been identified that meet the start-up requirements at the sulphuric acid plant. All other energy used at the site is sourced from the reticulated electricity transmission network.</p>	<p>Amend Policy EIT-EN-P6 as follows:</p> <p>Avoid Restrict <i>the development of non-renewable energy generation activities in Otago and facilitate the replacement, <u>where practicable</u>, of non-renewable energy sources, including the use of fossil fuels, in energy generation.</i></p>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
				While Ravensdown supports the aim to reduce and minimise greenhouse gas emissions from non-renewable energy generation activities, complete avoidance or replacement may not be practicable or feasible. Amendments to the policy address these issues are therefore requested by Ravensdown.	
Topics / EIT – Energy, infrastructure and transport / TRAN - Transport					
71	Objective EIT–TRAN–O10 – Commercial port activities	161	Support	As discussed in relation to the definition of ‘commercial port activities’ (Sub. Ref. 1), the Ravensbourne wharf, which is part of the commercial port activity that takes place within the Otago Harbour, is used solely by the Dunedin Works to receive raw materials and dispatch product. Given this context, Ravensdown supports this objective as it aims to provide for the safe and efficient commercial port operations. Ravensdown also acknowledges that such operations need to take place within ‘environmental limits’ that are to be established within the coastal environment.	Retain Objective EIT-TRAN-O10 as notified.
72	Policy EIT–TRAN–P19 – Transport system design	161	Support	Ravensdown, as a user of both the road and coastal transport network in New Zealand, supports the aim of this policy to ensure that a resilient, adaptable and efficient transport network is sustained (and improved) within the region so as to provide for the transport of goods, as well as people.	Retain Policy EIT-TRAN-P19 as notified.
73	Policy EIT–TRAN–P23 – Commercial port activities	162	Support in part	Ravensdown, as the sole user of the Ravensbourne wharf (which is owned by the Port of Otago and leased to Ravensdown), supports the need to recognise the national and regional significance of all of the ‘commercial port activities’ that occur within Otago Harbour. Ravensdown also supports the aim to provide	Amend Policy EIT-TRAN-P23 as follows: <i>Recognise the national and regional significance of the commercial port activities associated with the ports at Port Chalmers, Ravensbourne and Dunedin (respectively) by:</i>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
				<p>for the efficient and safe operation of Otago Harbour’s port facilities, as well as the important associated connections to other transport modes (i.e., rail and road).</p> <p>In addition, as discussed in relation to the definition of ‘commercial port activities’ (Sub. Ref. 1), the Ravensbourne wharf is part of the commercial port activity that takes place within the Otago Harbour. Ravensdown therefore considers that the Ravensbourne wharf needs be recognised as forming part of the port’s operations (and facilities) alongside the facilities at Port Chalmers and Dunedin.</p>	...
74	Method EIT–TRAN–M7 – Regional plans	162 and 163	Support in part	<p>Ravensdown has requested amendments to the definition of ‘commercial port activities’, Objective EIT-TRAN-O10 and associated policies (refer above to Sub. Ref. 1 and Sub. Ref. 71 to 73).</p> <p>Given these requested amendments, subsequent amendments to this method are required to reflect the amendments to the relevant provisions of the PORPS 2021 that are accommodated within this method.</p>	<p>Amend Method EIT-TRAN-M7 as follows:</p> <p><i>Otago Regional Council must prepare or amend and maintain its regional plans to:</i></p> <p>...</p> <p>(2) <i>manage the adverse effects of infrastructure activities that:</i></p> <p>(a) ...</p> <p>(b) <i>include policies and methods that provide for the commercial port activities associated with the operations at Otago Harbour and the ports at Port Chalmers, Ravensbourne and Dunedin, and</i></p> <p>(3) <i>within environmental limits, facilitate the safe and efficient operation and development of commercial port activities at Port Chalmers, Ravensbourne and Dunedin. This includes previously approved resource consents for the following activities in the coastal development area mapped in MAP2:</i></p>

SUB. REF.	PORPS 2021 PROVISION	PAGE	SUPPORT / OPPOSE	COMMENTS	RELIEF SOUGHT
75	Method EIT-TRAN-M8 – District plans	163	Support in part	<p>Ravensdown has requested amendments to the definition of ‘commercial port activities’, Objective EIT-TRAN-O10 and associated policies (refer above to Sub. Ref. 1 and Sub. Ref. 71 to 73).</p> <p>Given these requested amendments, subsequent amendments to this method (i.e., Part (6)) are required to reflect the amendments to the relevant provisions of the PORPS 2021 that are accommodated within this method.</p>	<p>Amend Method EIT-TRAN-M8 as follows:</p> <p><i>Territorial authorities must prepare or amend and maintain their district plans to:</i></p> <p>...</p> <p><i>(6) include policies and methods that provide for commercial port activities associated with the operations at Otago Harbour and the ports at Port Chalmers, <u>Ravensbourne</u> and Dunedin.</i></p>
Topics / HAZ – Hazards and risks / HAZ-NH – Natural hazards					
76	Objective HAZ-NH-O1 – Natural hazards	165	Support	<p>This objective identifies there are natural hazard risks in the Otago region that affect people, communities and properties. The intent of the objective is to ensure that these risks do not exceed a ‘tolerable’ level.</p> <p>Ravensdown acknowledges that natural hazard risks, including from climate change, are present and will continue to be present into the future. Ravensdown also acknowledges that the level of acceptability of these risks should be quantified and identified so that the nature of management controls and restrictions, that may be put in place, can be determined. In this context, while the level of acceptability, or ‘tolerability’, will not be the same for everyone, in terms of an objective within the PORPS 2021, Ravensdown considers that this objective is generally appropriate.</p>	Retain Objective HAZ-NH-O1 as notified.
77	Objective HAZ-NH-O2 – Adaption	165	Support	<p>This objective, which sits alongside Objective HAZ-NH-O1 (Sub. Ref. 76 above), aims to ensure that Otago’s people, property and communities are prepared for, and can adapt to, the effects of natural hazards, including the natural hazard risks associated with climate change.</p>	Retain Objective HAZ-NH-O2 as notified.

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				Ravensdown considers that this objective, in the context of what can be achieved under the RMA and associated statutory planning documents (i.e., providing the means of identifying the risks and put in place resource management controls or restrictions) is generally appropriate. For this reason, Ravensdown supports this objective.	
78	Policy HAZ–NH–P1 – Identifying areas subject to natural hazards	165	Support	<p>This policy aims to identify the areas where natural hazards may adversely affect people, communities and property in the Otago region. Parts (1) to (6) then list the range of matters to consider when identifying natural hazard areas.</p> <p>Identification (and associated subsequent mapping) of natural hazard areas within the Otago region, based on the matters included in Parts (1) to (6) of this policy, is supported by Ravensdown. The identification of such areas, in a manner where everyone can identify where these areas are and understand their significance, is necessary for Otago’s people and communities to understand where the nature and extent of potential natural hazard risks.</p>	Retain Policy HAZ-NH-P1 as notified.
79	Policy HAZ–NH–P2 – Risk assessments	165	Support	<p>This policy, as proposed, requires an assessment of the level of natural hazard risk, and potential consequences, in accordance with the criteria set out within Appendix APP6.</p> <p>Ravensdown considers that in determining the future resource management approach for areas where it is determined that a natural hazard risk exists (as identified in accordance with Policy HAZ-NH-P1 – refer to Sub. Ref. 78 above), that it is necessary to quantify the level of risk and potential consequences. For this</p>	Retain Policy HAZ-NH-P2 as notified.

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				reason, Ravensdown supports this policy.	
80	Policy HAZ–NH–P4 – Existing activities	165 and 166	Support in part	<p>This policy aims to reduce the existing natural hazard risks, on existing activities in the region, through a range of mechanisms, including but not limited to: encouraging activities that reduce the risk (Part (1)); restricting activities that increase the risk (Part (2)); and, managing existing land uses in areas identified as representing a significant risk to people and communities (Part (3)).</p> <p>This policy is potentially relevant to Ravensdown’s Dunedin Works and its stores within the region. Given the potential implications for Ravensdown, it is considered that this policy generally reflects the range of options that are likely to be adopted to manage the risks from natural hazards on existing activities in the region.</p> <p>However, amendments to the policy are requested by Ravensdown for the following reasons:</p> <ul style="list-style-type: none"> - The policy should aim to manage, not reduce, natural hazard risks as the mechanisms included in the policy relate to both management, and potential reduction, of the risks. - The policy should refer to natural hazard risks more generally, not just existing risks, given that the profile of natural hazard risks will change over time. - In Part (1) of the policy, activities that reduce natural hazard risks should be provided for, as well as encouraged. 	<p>Amend Policy HAZ-NH-P4 as follows:</p> <p>Reduce existing <u>Manage</u> natural hazard risk by:</p> <p>(1) encouraging and providing for activities that reduce risk, or reduce community vulnerability,</p> <p>(2) ...</p>
81	Policy HAZ–NH–P5 – Precautionary	166	Oppose	<p>This policy, as proposed, seeks to implement a precautionary approach in circumstances where a natural hazard risk is uncertain or unknown, and where</p>	<p>Delete Policy HAZ-NH-P5 in its entirety.</p> <p>Where the natural hazard risk, either individually or cumulatively, is uncertain or unknown, but</p>

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	approach to natural hazard risk			<p>the risks may be significant or irreversible.</p> <p>Ravensdown opposes the inclusion of this policy, as the implementation of a precautionary approach, in the context proposed in the PORPS 2021, is not considered appropriate.</p> <p>Firstly, identification of risks, including natural hazard risks as provided for by the PORPS 2021, includes a process of quantifying the risk based on available information. This does not mean that all information is certain or known. In this context, the adoption of a precautionary approach to quantifying potential natural hazard risks is inappropriate.</p> <p>Also, under the RMA, the precautionary approach is applied where the adverse effects of a resource use activity may be uncertain, unknown or little understood, but potentially significantly adverse (as stated in Policy 3 of the NZCPS). This PORPS 2021 policy does not relate to effects of activities being uncertain and unknown, but rather it inappropriately relates to uncertain or unknown natural hazard risks (which it could argued will always be uncertain).</p>	<p>potentially significant or irreversible, apply a precautionary approach to identifying, assessing and managing that risk by adopting an avoidance or adaptive management response to diminish the risk and uncertainty.</p>
82	Policy HAZ-NH-P10 – Coastal hazards	167	Support	<p>This policy, as proposed, identifies a range of management approaches, as outlined in Parts (1) to (4), that will apply to land that may be affected by coastal hazards over at least the next 100 years. The approaches include: avoiding increasing the risk of harm from coastal hazards; ensuring land use change or redevelopment does not increase the risk to people and communities; encouraging land use change or redevelopment that reduces the risks; and, ensuring that the ability of people and communities to adapt to, or mitigate, the effects of sea level rise and climate</p>	Retain Policy HAZ-NH-P10 as notified.

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				<p>change have been considered.</p> <p>The Dunedin Works is located alongside Otago Harbour and therefore may be located in an area potentially affected by coastal hazards over the next 100 years. In this context, Ravensdown acknowledges that it is appropriate to that any redevelopment that may occur within the site in the future address the approaches identified within this policy.</p>	
83	Method HAZ–NH–M1 – Statement of responsibilities	167 and 168	Support	<p>This method outlines the responsibilities of the regional council and territorial authorities in relation to controlling land use activities to avoid or mitigate natural hazards. Included in the identified responsibilities, is the need for natural hazard areas to be identified and mapped in regional and district plans.</p> <p>Ravensdown considers that the identification and mapping of natural hazard areas in regional and district plans is appropriate. The proposed mapping allows resource users to recognise the presence of natural hazard risks in specific areas, and to then assess options for use of such areas that avoid or mitigate the risk to the site, and others, in accordance with the provisions of the statutory planning documents.</p>	Retain Method HAZ-NH-M1 as notified.
84	Method HAZ–NH–M2 – Local authorities	168	Support in part	<p>Ravensdown has requested amendments to the natural hazards policy framework of the PORPS 2021 (refer above to Sub. Ref. 78 to 82).</p> <p>Given these requested amendments, subsequent amendments to this method (i.e., Part (4)) are required to reflect the amendments to the relevant provisions of the PORPS 2021 that are accommodated within this method.</p>	<p>Amend Method HAZ-NH-M2 as follows:</p> <p><i>Local authorities must:</i></p> <p>...</p> <p>(4) <i>prepare or amend and maintain their regional or district plans to take into account the effects of climate change by:</i></p> <p>(a) <i>using the best relevant climate change data and projections to 2115,</i></p> <p>(b) <i>taking a precautionary approach when</i></p>

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					<p><i>assessing and managing the effects of climate change where there is scientific uncertainty and potentially significant or irreversible effects,</i></p> <p>(c) ...</p>
85	Method HAZ–NH–M3 – Regional plans	168 and 169	Support in part	<p>Ravensdown has requested amendments to the natural hazards policy framework of the PORPS 2021 (refer above to Sub. Ref. 78 to 82).</p> <p>Given these requested amendments, the deletion of Part (6) of the method is required to reflect the amendments to the relevant provisions of the PORPS 2021 that are accommodated within this method.</p>	<p>Amend Method HAZ–NH–M3 as follows:</p> <p><i>Otago Regional Council must prepare or amend and maintain its regional plans to:</i></p> <p>...</p> <p>(6) include provisions that require decision makers to apply the precautionary approach set out in HAZ–NH–P5 when considering applications for resource consent for activities that will change the use of land and thereby increase the risk from natural hazards within areas subject to natural hazard risk that is uncertain or unknown, but potentially significant or irreversible, and</p> <p>(6) ...</p>
86	HAZ–NH–M4 – District plans	169 and 170	Support in part	<p>Ravensdown has requested amendments to the natural hazards policy framework of the PORPS 2021 (refer above to Sub. Ref. 78 to 82).</p> <p>Given these requested amendments, the deletion of Part (6) of the method is required to reflect the amendments to the relevant provisions of the PORPS 2021 that are accommodated within this method.</p>	<p>Amend Method HAZ–NH–M4 as follows:</p> <p><i>Territorial authorities must prepare or amend and maintain their district plans to:</i></p> <p>...</p> <p>(6) include provisions that require decision makers to apply the precautionary approach set out in HAZ–NH–P5 when considering applications for resource consent for activities that will change the use of land and which may increase the risk from natural hazards within areas subject to natural hazard risk</p>

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					that is uncertain or unknown, but potentially significant or irreversible, and (67) ...
Topics / HAZ – Hazards and risks / HAZ-CL – Contaminated land					
87	Objective HAZ-CL-O3 – Contaminated land	172	Support	<p>This objective aims to ensure that contaminated land and waste materials are managed so that human health, mana whenua values and the environment are protected.</p> <p>Given the nature of the industrial activities which continue to occur at the Dunedin Works site, Ravensdown considers that it is important that contaminated land and the management of waste occurs in a manner that does protect human health, mana whenua values and the environment.</p>	Retain Objective HAZ-CL-O3 as notified.
88	Policy HAZ-CL-P14 – Managing contaminated land	172	Support in part	<p>This policy requires the active management of contaminated or potentially contaminated land in order to ensure there is no unacceptable risk to people and the environment from such land. Parts (1) to (4) of the policy outlines various active management approaches.</p> <p>Ravensdown supports this policy as the active management of such land so that it does not pose an unacceptable risk to human health and the environment is the appropriate resource management response to such circumstances.</p> <p>While supporting the policy, Ravensdown considers that amendments to Parts (2) and (3) of the policy are required to more clearly articulate what is required. The reasons for the proposed amendments are as follows:</p> <ul style="list-style-type: none"> - The first part of Part (2) effectively repeats the requirement in the policy chapeau, which is to 	<p>Amend Policy HAZ-CL-P14 as follows:</p> <p><i>Actively manage contaminated or potentially contaminated land so that it does not pose an unacceptable risk to people and the environment, by:</i></p> <p>(1) ...</p> <p>(2) protecting human health in accordance with implementing regulatory requirements,</p> <p>(3) avoiding, as the first priority, and only where avoidance is not practicable, <i>mitigating or remedying</i> mitigating, <i>adverse effects of the contaminants on the environment, and</i></p> <p>(4) ...</p>

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				<p>manage activities so they do not pose an acceptable risk to people. On this basis, there is no need to repeat the fact that human health is to be protected. Also, Ravensdown considers that the intent of this part of the policy is to require the implementation of relevant regulatory requirements (i.e., currently the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health).</p> <ul style="list-style-type: none"> - As this policy refers to land that is contaminated or potentially contaminated, Part (3) of the policy should refer to mitigating or remedying adverse effects (i.e., it is too late to avoid the adverse effects of the contaminants). 	
89	Policy HAZ-CL-P16 – Waste minimisation responses	172	Support	<p>This policy aims to ensure that the principles of the waste management hierarchy are applied to the management of all waste streams.</p> <p>Subject to amending the ‘waste’ definition contained in the PORPS 2021 to that used in the Waste Minimisation Act 2008 (as requested by Ravensdown – refer to Sub Ref. 10), Ravensdown supports this policy as it is consistent with the purpose and requirements of the Waste Minimisation Act 2008.</p>	Retain Policy HAZ-CL-P16 as notified.
90	Method HAZ-CL-M6 – Regional plans	173	Support	<p>This method, which outlines the matters that must be included in regional plans in relation to contaminated land, reflects the intent of the contaminated land objectives and policies contained in this chapter of the PORPS 2021.</p> <p>As Ravensdown has generally supported the contaminated land (and waste) objective and policies (except for amendments to Policy HAZ-CL-P14 – refer</p>	Retain Method HAZ-CL-M6 as notified.

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				above to Sub. Ref. 88), Ravensdown also supports this method.	
Topics / NFL – Natural features and landscapes					
91	Objective NFL–O1 – Outstanding and highly valued natural features and landscapes	182	Support in part	<p>Ravensdown considers that the PORPS 2021’s proposed definition of ‘highly valued natural features and landscapes’ (refer to Sub. Ref. 2 above) has incorrectly interpreted sections 7(c) and (f) of the RMA as meaning ‘highly valued’ and ‘natural’ landscapes. For the reasons outlined in Sub. Ref. 2, Ravensdown has requested that the definition of ‘highly valued natural features and landscapes’ be deleted from the PORPS 2021, which includes this objective.</p> <p>However, Ravensdown also considers that it is important to identify landscapes in the region that meet the requirements of sections 6(b) and 7(c) of the RMA. It is also important to provide for protection of identified outstanding natural features and landscapes (i.e., in accordance with section 6(b) of the RMA), and the maintenance and enhancement of other identified landscapes that contribute to an area’s overall visual amenity (i.e., in accordance with section 7(c) of the RMA). Amendments to the objective that reflect this hierarchy have therefore been proposed by Ravensdown.</p>	<p>Amend Objective NFL-01 as follows:</p> <p><i>Objective NFL–O1 – Outstanding and highly valued natural features, and outstanding natural landscapes and visual amenity landscapes</i></p> <p><i>The areas and values of Otago’s outstanding and highly valued natural features, and outstanding natural landscapes and visual amenity landscapes are identified, and the use and development of Otago’s natural and physical resources results in:</i></p> <ol style="list-style-type: none"> <i>(1) the protection of outstanding natural features and landscapes, and</i> <i>(2) the maintenance or enhancement of highly valued natural features and visual amenity landscapes that contribute to an area’s overall visual amenity.</i>
92	Policy NFL–P1 – Identification	182	Support in part	<p>Ravensdown agrees that there is a need to identify the region’s outstanding natural features and landscapes, and other landscapes that contribute to an area’s overall visual amenity.</p> <p>However, given the amendments requested to Objective NFL-01 (Sub. Ref. 91), subsequent amendments to this policy are required to deliver on the</p>	<p>Amend Policy NFL-P1 as follows:</p> <p><i>In order to manage outstanding and highly valued natural features, and outstanding natural landscapes and visual amenity landscapes, identify:</i></p> <ol style="list-style-type: none"> <i>(1) the areas and values of outstanding and highly valued natural features and landscapes</i>

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				<p>intent of the objective as amended by Ravensdown.</p> <p>Also, as discussed below in relation APP9 (Sub. Ref. 101), the APP9 criteria reflects the 'Amended Pigeon Bay Criteria' which Ravensdown understand applies to outstanding natural features and landscapes (section 6(b) of the RMA). The APP9 criteria is therefore not relevant to other landscapes and associated values.</p>	<p><i>in accordance with APP9,</i></p> <p>(2) the areas and values of visual amenity landscapes that contribute to an area's overall visual amenity, and</p> <p>(3) the capacity of those outstanding natural features and landscapes to accommodate use or development while protecting the values that contribute to the outstanding natural feature and landscape being considered outstanding, and / or highly valued.</p> <p>(4) the capacity of visual amenity landscapes to accommodate use or development while maintaining or enhancing the amenity values that contribute to the landscape's overall visual amenity.</p>
93	Policy NFL-P3 – Maintenance of highly valued natural features and landscapes	182	Support in part	<p>Given the amendments requested to Objective NFL-01 (Sub. Ref. 91) and Policy NFL-P1 (Sub. Ref. 92), subsequent amendments to this policy are required to deliver on the intent and aim of the objective and Policy NFL-P1.</p> <p>In addition, as the aim of this policy is to maintain or enhance the proposed identified visual amenity landscapes, application of the effects hierarchy, in the manner proposed in the policy, is not appropriate.</p>	<p>Amend Policy NFL-P3 as follows:</p> <p><i>Maintain or enhance highly valued natural features and identified visual amenity landscapes by:</i></p> <p>(1) avoiding significant adverse effects on the values of the natural feature or landscape, and</p> <p>(2) avoiding, remedying or mitigating other adverse effects on the values that contribute to the landscape's overall visual amenity.</p>
94	Policy NFL-P4 – Restoration	182	Oppose	<p>While the concept of endeavouring to restore the region's degraded landscape and associated values, where appropriate, is supported by Ravensdown, it is considered that this policy does not reflect this intent.</p> <p>Outstanding natural landscapes (and features) and visual amenity landscapes, given the criteria and values</p>	<p>Delete Policy NFL-P4 in its entirety.</p> <p>Promote restoration of the areas and values of outstanding and highly valued natural features and landscapes where those areas or values have been reduced or lost.</p>

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				<p>that will apply to such areas, will not be degraded. Therefore, the restoration of these landscapes will not be required.</p> <p>It is also noted that Policies NFL-P2 and NFL-P3 require the protection and/or maintenance or enhancement of these landscapes and associated values.</p>	
95	Policy NFL-P6 – Coastal features and landscapes	183	Oppose	<p>This proposed policy provides administrative guidance on the interrelationship between provisions in this section of the PORPS 2021 and provisions contained in the Coastal Environment section of the PROPS 2021.</p> <p>As this policy does not provide any specific guidance of relevance to resource management processes, and given that Policy CE-P6 is self-explanatory, Ravensdown considers that this proposed policy is not needed and should be deleted.</p>	<p>Delete Policy NFL-P6 in its entirety.</p> <p>Natural features and landscapes located within the coastal environment are managed by CE-P6 and implementation of CE-P6 also contributes to achieving NFL-O1.</p>
Topics / ECO –Urban form and development					
96	Objective UFD-O2 – Development of urban areas	186	Support	<p>This objective seeks to ensure that Otago’s urban areas, as they continue to development and change, provide for the broad range of needs and services, including those outlined in Parts (1) to (11) of the objective.</p> <p>Ravensdown’s Dunedin Works is located in the broader Dunedin urban area. Given that the Dunedin Works is an existing activity, which is industrial in nature, and which is located within an appropriate industrial zone, this objective is supported as it seeks to:</p> <ul style="list-style-type: none"> - allow, including existing (presumably) non-residential activities in urban areas, such as the Dunedin Works, to meet community needs when located in appropriate locations (Part (2)); - respect and enhance an areas existing built environment (i.e., such as the Dunedin Works) (Part 	Retain Objective UFD-O2 as notified.

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				(3)); and - minimise conflicts between incompatible activities, for example, industrial and residential activities (Part (6)).	
97	Objective UFD-O4 – Development in rural areas	187	Support in part	<p>This objective seeks to ensure that development in Otago’s rural areas achieves the outcomes contained in Parts (1) to (4) of the objective. This includes, but is not limited to: avoiding development on highly productive land and soil (Part (2)); only providing for urban expansion in locations identified through strategic plans, or where zoned in district plans (Part (3)); and, ensuring that the natural and physical resources in rural areas can continue to be used by productive rural activities (Part (4)).</p> <p>Ravensdown supports the need, as reflected in this objective, to ensure that rural areas can continue to be used for productive rural activities, including associated rural support activities, such as Ravensdown’s stores. This includes ensuring that the New Zealand’s highly productive land and soils are not lost to development, that development does not give rise to reverse sensitivity effects within the rural environment, while also ensuring that rural activities and associated rural activities can operate and develop.</p> <p>While supporting the objective, Ravensdown considers that the terminology used in Part (2) of the objective does not reflect the terminology used in Policy LF-LS-P19 (Sub. Ref. 63). Ravensdown therefore requests an amendment that focuses on protecting highly productive land and soil, rather than avoiding development on such areas as a first priority.</p>	<p>Amend Objective UFD-O4 as follows:</p> <p><i>Development in Otago’s rural areas occurs in a way that:</i></p> <p>(1) ...</p> <p>(2) avoids as the first priority, ensures land and soils identified as highly productive by LF-LS-P19 are protected, unless there is an operational need for the development to be located in rural areas,</p> <p>(3) ...</p>

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98	Policy UFD-P6 – Industrial activities	189 and 190	Support in part	<p>This policy, as proposed, aims to provide for industrial activities in urban areas, by implementing the approaches included in Parts (1) to (4) of the policy. These approaches include, but are not limited to: providing zones for industrial activities, including ensuring that zone provisions accommodate and meet the needs of such activities, including support or ancillary activities (Part (1) and (2)); and, managing non-industrial activities in industrial zones to avoid reverse sensitivity effects (Part (3)).</p> <p>Ravensdown’s Dunedin Works is located in an industrial zone in an urban area. It is important that this zoning, and associated industrial zone provisions, continue to provide for Ravensdown’s operations. It is also important that non-residential activities, that given rise to reverse sensitivity effects, cannot establish within this zone. For these reasons, Ravensdown supports this policy.</p> <p>While supporting this policy, an amendment to Part (3) of this policy is requested. Reverse sensitivity effects can arise from activities adjoining industrial zoned land, and therefore district plan zoning, and associated provisions, need to manage this potential issue as well. Ravensdown has therefore requested an amendment to Part (3) that identifies that non-industrial activities are to be managed in areas adjoining industrial zones (as well as within such zones), so as to avoid reverse sensitivity effects on industrial activities in industrial zones.</p>	<p>Amend Policy UFD-P6 as follows:</p> <p><i>Provide for industrial activities in urban areas by:</i></p> <p>(1) ...</p> <p>(3) <i>managing the establishment of non-industrial activities, in <u>and adjoining</u> industrial zones, by avoiding activities likely to result in reverse sensitivity effects on industrial activities, or likely to result in an inefficient use of industrial zoned land or infrastructure, particularly where:</i></p> <p>...</p>
99	Policy UFD-P7 – Rural Areas	190	Support	<p>This policy, consistent with Objective UFD-O4 (Sub. Ref. 97 above), seeks to manage activities in rural areas by implementing the approaches outlined in Parts (1) to (7)</p>	Retain Policy UFD-P7 as notified.

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				<p>of this policy. This includes, but is not limited to: maintaining the productive capacity and character or rural areas (Part (1)); enabling primary production, particularly on highly productive land and soils (Part(2)); facilitate rural industry and supporting activities (Part (3)); and, manages potential reverse sensitivity effects on non-rural activities (Parts (5) to (7)).</p> <p>As stated above in relation to Objective UFD-O4, Ravensdown supports the management of activities to ensure that rural areas can continue to be used for productive rural activities, including associated rural support activities, such as Ravensdown’s stores. This includes ensuring that the New Zealand’s highly productive land and soils are not lost to development, that development does not give rise to reverse sensitivity effects within the rural environment, while also ensuring that rural activities and associated rural activities can operate and develop.</p>	
100	Policy UFD–P8 – Rural lifestyle and rural residential zones	190 and 191	Support in part	<p>This policy, as proposed, aims to restrict the establishment of rural lifestyle and rural residential zones by implementing the measures identified in Parts (1) to (6) of the policy. This includes, but is not limited to: minimising impacts on rural production and the potential for reverse sensitivity effects to arise from such zones and rural (Part (3)); and, avoiding effects on highly productive land (Part (4)).</p> <p>As stated above in relation to Objective UFD-O4 (Sub. Ref. 97), Ravensdown supports managing potential rural lifestyle and rural residential development in a manner which ensures that rural areas can continue to be used for primary production activities, including associated rural support activities, such as Ravensdown’s stores.</p>	<p>Amend Policy UFD-P8 as follows:</p> <p><i>The establishment, development or expansion of rural lifestyle and rural residential zones only occurs where:</i></p> <p>...</p> <p>(4) avoids, as the first priority, <i>highly productive land identified in accordance with LF–LS–P169 is protected,</i></p> <p>...</p>

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				<p>This includes ensuring that the New Zealand’s highly productive land and soils are not lost to development, that development does not give rise to reverse sensitivity effects within the rural environment, while also ensuring that rural activities and associated rural activities can operate and develop.</p> <p>While supporting the policy, similar to the issue raised in relation to Objective UFD-O4, Ravensdown considers that the terminology used in Part (4) of the objective does not reflect the terminology used in Policy LF-LS-P19 (Sub. Ref. 63). Ravensdown therefore requests an amendment that focuses on protecting highly productive land, rather than avoiding development on such areas as a first priority.</p>	
PART 5 – APPENDICES AND MAPS					
<i>Appendices</i>					
101	APP9 – Identification criteria for outstanding and highly valued natural features, landscapes and seascapes	215	Support in part	<p>The criteria contained in APP9 reflects the ‘Amended Pigeon Bay Criteria’. This criterion is used by landscape experts to identify outstanding natural features, outstanding natural landscapes and landscapes in the coastal environment which are natural in character, and which should be protected and/or preserved in accordance with section 6(b) and (a) of the RMA. Accordingly, Ravensdown considers that the application of the APP9 criteria to identify outstanding natural feature landscape and seascapes is appropriate.</p> <p>However, Ravensdown does not support the concept of applying this criterion to other landscape features, which the PORPS 2021 has defined as ‘highly valued natural features and landscapes’. As discussed under Sub. Ref. 2, the PORPS 2021 defines ‘highly valued</p>	<p>Amend the appendix as follows:</p> <p><i>APP9 – Identification criteria for outstanding and highly valued natural features, landscapes and seascapes</i></p> <p><i>The areas and the values of outstanding and highly valued natural features, landscapes and seascapes are identified using the following attributes:</i></p> <p>...</p>

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				natural features and landscapes’ as those which contain the attributes and values of significance under sections 7(c) and 7(f) of the RMA. Given the guidance under sections 7(c) and 7(f), features and landscapes that contribute to amenity values (i.e., often call ‘visual amenity landscapes’ within planning documents) or the quality of the environment, are to be maintained or enhanced, and do not trigger the need to protect or preserve required by section 6(a) and (b) of the RMA. On this basis, it is considered inappropriate to apply the ‘Amended Pigeon Bay Criteria’ to the landscapes which the PORPS 2021 has called ‘high valued’.	
Maps					
102	MAP 2 – EIT-TRAN-M7 Port Activities	220	Support	<p>Method EIT-TRAN-M7 (Sub. Ref. 74 above) states that Council must prepare, amend and maintain a regional plan which, amongst a range of matters, must, within environment limits, facilitate the safe and efficient operation of commercial port activities within the ‘coastal development area’ (CDA) identified in MAP2 (i.e., within Otago Harbour).</p> <p>The CDA, as shown on MAP2, includes the area associated with the Ravensbourne wharf. As the Ravensbourne wharf forms part of the harbour’s ‘commercial port activities’, Ravensdown supports the extent of the CDA as shown on MAP2.</p>	Retain MAP2 as notified.