

From: [Kristina Mead](#)
To: [RPS](#)
Subject: PORPS
Date: Thursday, 11 November 2021 2:43:08 p.m.
Attachments: [image001.png](#)
[image002.png](#)
[ATT00001.png](#)
[FH Further Submission on Proposed Otago RPS \(Final 11 11 21\).pdf](#)

Please find attached a further submission on behalf of Fulton Hogan on the Proposed Otago Regional Policy Statement.

Ngā Mihi | Kind regards,

Kristina | Senior Planner

BRP(Hons)

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Form 6

Further Submissions on the Proposed Otago Regional Policy Statement 2021

To: Otago Regional Council
Private Bag 1954
Dunedin 9054

Submitter: Fulton Hogan Limited

This is a further submission by Fulton Hogan Limited (Fulton Hogan) on the proposed Otago Regional Policy Statement 2021.

Fulton Hogan has an interest in the proposal that is greater than the interest of the general public. This is because submissions have been made which, if relief is granted as sought, have the potential to positively or adversely impact on the ability of Fulton Hogan to operate their business in an efficient and effective manner.

The table annexed as **Appendix A** and forming a part of this further submission contains:

- a) The submissions which Fulton Hogan supports or opposes,
- b) The particular parts of those submissions supported or opposed,
- c) Reasons for support or opposition, and
- d) The decision sought by Fulton Hogan (whether the submission should be allowed or disallowed).

Fulton Hogan wishes to be heard in support of its further submission.

If others make a similar submission, Fulton Hogan will consider presenting a joint case with them at a hearing

Signed on behalf of
Fulton Hogan



Dated 12 November 2021

Address for Service of Submitter:

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Appendix A: Further Submissions

Ref#	Fulton Hogan supports or opposes the submission of:	Support or opposition	The particular part of the submission Fulton Hogan supports or opposes is:	The reasons for Fulton Hogan's support or opposition are:	Fulton Hogan seeks the following:
1	Kāi Tahu ki Otago / Aukaha	Oppose	00226.033 Primary Production	It is appropriate that the definition of primary production in the pRPS uses that set out in the National Planning Standards. The National Planning Standards recognise primary production is broader than outdoor agricultural, pastoral and horticultural activities.	That the submission be disallowed
2		Oppose in part	00226.199 LF – LS – O11 00226.204 LF – LS – P19 00226.318 UFD – P7	These submission points seek to narrow the definition of primary production to remove quarrying, mining etc based on an assumption that these activities do not depend on highly productive land. However, it is appropriate that ORC use the definition of primary production as set out in the National Planning Standards. While highly productive land is not defined within the pRPS, LF – LS – P19 provides criteria for its identification which includes the ability of the land to support primary production. Therefore, primary production activities are appropriate on highly productive land. The apparent tension in this objective and policies is not a result of providing for primary production on highly productive land, but rather the reference to soils and assessing their suitability based solely on the Land Use Capability classification system, which does not reflect the true breadth of soil productivity values.	That the submission be disallowed
3	Waka Kotahi NZ Transport Agency	Support	00305.005 New definition – Reverse Sensitivity	Reverse sensitivity is an issue that is often misinterpreted. Defining this effect may assist in achieving a common application of provisions addressing reverse sensitivity and on this basis is supported.	That the submission be allowed
4	Dunedin City Council	Oppose in part	001139.263 UDF-P8	Rural lifestyle and rural residential zones should be planned for in locations where reverse sensitivity effects are avoided. The threshold for these zones avoiding a location should not be set at 'significant' reverse sensitivity effects.	That the submission be disallowed
5	Horticulture New Zealand	Oppose	00236.104 UDF-M2	While the intent of this submission point is to ensure reserve sensitivity effects of urban development are considered within the urban and rural-urban interface, inclusion of these terms excludes other environments within which potential reverse sensitivity effects could occur.	That the submission be disallowed

Addresses of submitters

Submitter	Address
Dunedin City Council	Anna Johnson 50 The Octagon Dunedin PO Box 5045
Horticulture New Zealand	Rachel McClung PO Box 10-232 WELLINGTON
Kāi Tahu ki Otago / Aukaha	Sandra McIntyre Aukaha (1997) Ltd PO Box 446 Dunedin 9054
Waka Kotahi NZ Transport Agency	Helen Depster PO Box 5245 Dunedin 9058