

From: [Macaela Flanagan](#)
To: [RPS](#)
Subject: Further Submission - Minister for the Environment
Date: Friday, 12 November 2021 2:45:55 p.m.
Attachments: [image003.png](#)
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[Further Submission on Otago pRPS - Minister for the Environment.docx](#)

Good afternoon

Please find attached the Minister for the Environment's further submission on Otago Regional Council's proposed Regional Policy Statement.

Ngā mihi
Macaela

Macaela Flanagan (she/her)

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Ministry staff work flexibly by default. For me, this means I work 8.30-2.30.



Form 6

Further submission in support of, or in opposition to, submission on notified proposed Otago Regional Policy Statement 2021

(Submissions must be received by Otago Regional Council by 5pm on Friday 12 November 2021, and by original submitters within 5 working days of service on ORC)

To: Otago Regional Council

1. Name of person making further submission

Hon David Parker, Minister for the Environment

2. This is a further submission in support of (or in opposition to) submissions on the **Proposed Otago Regional Policy Statement 2021**.

3. I am:

	A person representing a relevant aspect of the public interest. In this case, also specify the grounds for saying that you come within this category; or
✓	a person who has an interest in the proposal that is greater than the interest the general public has. In this case, also explain the grounds for saying that you come within this category; or
Grounds:	As the Minister for the Environment.

4. I **wish** to be heard in support of my further submission.

5. If others make a similar submission, I **will** consider presenting a joint case with them at a hearing.

6. Further Submitter Details

a. Signature of person making further submission

(or person authorised to sign on behalf of submitter. A signature is NOT required if you make your submission by electronic means).

Hon David Parker

b. Signatory name, position, and organisation *(if signatory is acting on behalf of a submitter organisation or group referred to at Point 1 above)*

Hon David Parker

Minister for the Environment

c. Date

12 November 2021

Address for service of person making further submission *(This is where all correspondence will be directed)*

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

Macaela Flanagan

e. Email: *(this is our preferred means of contact)*

Macaela.flanagan@mfe.govt.nz

f. Telephone:

022 023 4470

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

PO Box 10362

Wellington 6143

New Zealand

7. My further submission is:

Pursuant to clause 8 of the First Schedule of the Resource Management Act 1991 (RMA), I, Hon David Parker, Minister for the Environment, make the following further submission in respect of the Proposed Otago Regional Policy Statement 2021.

Submitter number	Original submission point number	Support OR Oppose	The reasons for my support/opposition are:	I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed): [Please state].
00137 Director General of Conservation	00137.040	Support in part	I agree with the point made by the Department that this policy has fundamental importance across the entire RPS.	
00139 Dunedin City Council	00139.081	Support in part	I agree with the point made by Dunedin City Council that further clarification may be needed to reflect the priority given to health needs of people as required by NPS-FM 2020 – particularly, drinking water and how that is balanced against ‘well-being’, which has been introduced into tier two of the hierarchy (noting social, economic and cultural well-being is in tier three of the hierarchy in NPS-FM 2020).	
00235 Otago Water Resource Users Group	00235.065	Oppose	<p>I oppose the point made by the Otago Water Resource Users Group because the notified version much more closely reflects NPS-FM 2020 clause 1.6 which:</p> <ul style="list-style-type: none"> • requires the use of the best information available at the time. • Requires a person using this information to not delay making a decision solely because on uncertainty about the quality of quantity of information available. <p>The suggested amendment would not give effect to NPS-FM 2020.</p>	
00137	00137.041	Support	I agree with DOC that this suggested amendment better gives effect to policy 5 of NPS-FM 2020,	

Director General of Conservation			which requires freshwater ecosystems be maintained and (if communities choose) improved.	
00137 Director General of Conservation	00137.071	Support in part	I agree with DOC that protection and the promotion of restoration of wetlands are required by NPS-FM 2020 policy 6.	
00231 Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.075 & 00231.079	Support in part	I support the suggestion to provide clear guidance and a method for how to implement policies 9 and 10 but acknowledge we have not fully considered the approach proposed.	
00321 New Zealand Infrastructure Commission, Te Waihanga	00321.099	Oppose	<p>I oppose the New Zealand Infrastructure Commission / Te Waihanga's submission that Otago's proposed Regional Policy Statement process should be delayed until the Natural and Built Environments Act is completed. The Freshwater Planning Commissioners are obligated to take into account the law as it currently stands, and not to be making determinations as to what the future law might be.</p> <p>The RMA requires ORC to update its Land and Water plan by 2024 to give effect to NPS-FM 2020, and by agreement with me as the Minister for the Environment, ORC have brought that forward to 2023.</p> <p>An updated Regional Policy Statement is required before the development of the new Land and Water Plan and it should not be delayed. I have made clear my intention to carry the policy intent</p>	

			of the NPS-FM 2020 over into the new National Planning Framework.	
00321 New Zealand Infrastructure Commission, Te Waihanga	00321.009	Oppose	NPS-FM 2020 requires both a Te Mana o Te Wai hierarchy of priorities approach (Objective 2.1) and integrated management (c3.5 NPS-FM 2020). These two approaches are not conflicting and can, and to give effect to NPS-FM 2020 must, work together.	
Note: Additional rows for each separate further submission point should be added as required.				