

From: [Stephanie Lau](#)
To: [RPS](#)
Cc: ["graeme.mathieson@mitchelldaysh.co.nz"](#); ["Joanne Dowd"](#); ["njladding@hotmail.com"](#); ["Dominic.Adams@ballance.co.nz"](#); ["Lilly.Lawson@beeflambnz.com"](#); [Lindsay Fung](#); ["joshua.leckie@laneneave.co.nz"](#); ["katharine.hockly@laneneave.co.nz"](#); ["philh.murray@xtra.co.nz"](#); ["andy@mishasvineyard.com"](#); ["chris@incite.co.nz"](#); ["chris.draxton@contactenergy.co.nz"](#); [Murray Brass](#); [Anna Johnson](#); ["sarah.hickey@dcc.govt.nz"](#); [KReilly](#); ["markp@farmside.co.nz"](#); ["office@waineuk.co.nz"](#); ["Ben.Williams@chapmantripp.com"](#); ["Rachel.Robilliard@chapmantripp.com"](#); ["tensor@tonkintaylor.co.nz"](#); ["crose@greenpeace.org"](#); ["herlihy@xtra.co.nz"](#); ["jimhop46@gmail.com"](#); [Rachel McClung](#); ["sarah.eveleigh@al.nz"](#); ["kate@aukaha.co.nz"](#); [Sandra McIntyre](#); ["laura.mclaughlan@al.nz"](#); ["maree.baker-galloway@al.nz"](#); ["susie@mckconsultancy.co.nz"](#); ["Robin@nimbusgroup.co.nz"](#); ["andrew.feierabend@meridianenergy.co.nz"](#); ["Macacla.flanagan@mfe.govt.nz"](#); [Megan Justice](#); ["sarah.eveleigh@al.nz"](#); ["Robert.addison@tewaihangahanga.govt.nz"](#); ["penny.cairns@pork.co.nz"](#); ["alison.paul@oceanagold.com"](#); ["pip.walker@environmentlaw.nz"](#); [Nigel Paragreen](#); ["achristensen@fishandgame.org.nz"](#); ["lloyd@m90fs.co.nz"](#); [Rebecca McGrouther](#); ["Erin.auchterlonie@qldc.govt.nz"](#); ["carmen@planzconsultants.co.nz"](#); ["r.zwaan@forestandbird.org.nz"](#); ["steve.tuck@mitchelldaysh.co.nz"](#); ["Evelynm.skinner1@gmail.com"](#); [Matthew Sole](#); ["phil.lynn2@xtra.co.nz"](#); ["Norman.elder@awslegal.co.nz"](#); [Maria Bartlett](#); ["Tanya.Stevens@ngaitahu.iwi.nz"](#); ["IGunn@LINZ.govt.nz"](#); ["ainsley@amconsulting.co.nz"](#); [Ben Farrell](#); [Victoria van der Spek](#); ["admin@waitakirrigators.co.nz"](#); ["richard.shaw@nzta.govt.nz"](#); ["EnvironmentalPlanning@nzta.govt.nz"](#); ["fblack@realjourneys.co.nz"](#); ["secretary@wiseresponse.org.nz"](#); ["science-advisor@yeptrust.org.nz"](#)
Subject: PORPS Further Submission
Date: Friday, 12 November 2021 12:47:08 p.m.
Attachments: [image001.png](#)
[Further Submissions Form on Proposed Otago RPS 2021 OWRUG.pdf](#)

Good afternoon,

Please find **attached** for filing and service, the further submission of Otago Water Resource Users Group.

	<p>Stephanie Lau Legal Administrator</p> <p>stephanie.lau@gallowaycookallan.co.nz</p> <p>GALLOWAY COOK ALLAN LAWYERS Level 2, 123 Vogel Street P O Box 143, Dunedin 9054, NZ Ph 03 477 7312 Fax: 03 477 5564</p> <p>www.gallowaycookallan.co.nz</p>
---	--

Covid-19: Our offices are open and we are able to see clients with appointments (but with masks, sign-in, extra hygiene measures and social distancing).
We are also able to communicate remotely via phone or video and are happy to arrange this with you as needed.
For all contact details click [HERE](#)

This email and any attachments are confidential and may be legally privileged. Galloway Cook Allan accepts no responsibility for changes made to this email or to any attachments after transmission from its offices. If you are not the intended recipient please tell us immediately and then delete this email. Thank you

FORM 6
FURTHER SUBMISSION ON PUBLICALLY NOTIFIED PROPOSAL FOR POLICY STATEMENT
BY OTAGO WATER RESOURCE USER GROUP
PURSUANT TO CLAUSE 6 OF THE FIRST SCHEDULE,
RESOURCE MANAGEMENT ACT 1991

To: Otago Regional Council
Private Bag 1954
DUNEDIN

Further submission by: Otago Water Resource User Group (OWRUG)
on: Proposed Otago Regional Policy Statement June 2021
Date 12 November 2021

1. Introduction

Otago Water Resource Users Group represents a range of water permit holders in Otago. Its members extend from the Upper Clutha through to the Alexandra basin and include the Cardrona, Arrow, Bannockburn, Pisa area, Teviot, Manuherekia and Taieri catchments.

The group evolved out of a United Council Irrigation Committee in the late 1970's and was started to give a combined representation during the sale of the old irrigation schemes from the Government to the irrigators in the 1980's and 1990's.

The group has been actively involved in Otago Regional Council policy development, including significant engagement with processes associated with the limit setting plan changes for the 'priority catchments' – the Manuherekia, Arrow and Cardrona Catchments. The ambit of this submission is not however limited to those catchments but from an Otago-wide perspective.

OWRUG is a person who has an interest in the proposal that is greater than the interest the general public has because OWRUG filed an original submission with respect to the Proposed Regional Policy Statement 2021 (PRPS21) and its members comprise water users and landowners whose activities will be affected by the contents of the PRPS21.

2. Further Submission

OWRUG makes this submission in support of and opposition to various original submissions on PRPS21. The various submission points that DIAL supports or opposes and the decisions sought are set out in **Appendix 1**.

OWRUG wishes to be heard in support of its further submission and may wish to present a joint case with submitters making a similar submission.

OWRUG makes further submissions with respect to the following original submissions. The details of the further submissions are set out at Appendix 1.

Submitter Name	Submitter number	Contact Person	Email address
AG Research Ltd	00208	G.J. Mathieson	graeme.mathieson@mitchelldaysh.co.nz
Aurora Energy Limited	00315	Joanne Dowd	joanne.dowd@auroraenergy.nz
Aotearoa Water Action (AWA)	00502	Niki Gladding	nigladding@hotmail.com
Ballance Agri-Nutrients	00409	Dominic Adams	Dominic.Adams@ballance.co.nz
Beef & Lamb NZ and Deer Industry NZ	00237	Lilly Lawson (Beef)	Lilly.Lawson@beeflambnz.com
		Lindsay Fung (Beef)	Lindsay.Fung@deernz.org
Blackthorn Lodge Glenorchy Limited	00119	Joshua Leckie / Katharine Hockly	joshua.leckie@laneneave.co.nz katharine.hockly@laneneave.co.nz
Central Otago Environmental Society	00202	Phil Murray	philh.murray@xtra.co.nz
Central Otago Winegrowers Association	00302	Andy Wilkinson	andy@mishasvineyard.com
Chorus, New Zealand Limited, Spark New Zealand Trading Limited and Vodafone New Zealand	00310	Graeme McCarrison	chris@incite.co.nz
Contact Energy Limited	00318	Chris Drayton	chris.drayton@contactenergy.co.nz
Director-General of Conservation	00318	Murray Brass	mbrass@doc.govt.nz
Dunedin City Council	00139	Anna Johnson	Anna.Johnson@dcc.govt.nz Cc: sarah.hickey@dcc.govt.nz
Federated Farmers of New Zealand	00239	Kim Reilly	kreilly@fedfarm.org.nz
		Mark Patterson	markp@farmside.co.nz
		Jared Ross	office@waineuk.co.nz (Jared)
Fonterra Co – operative Group Limited	00233	Brigid Buckley	Ben.Williams@chapmantripp.com Rachel.Robilliard@chapmantripp.com
Fulton Hogan Limited	00322	Tim Ensor	tensor@tonkintaylor.co.nz
Greenpeace Aotearoa	00407	Christine Rose	crose@greenpeace.org
Herlihy, Gavan James	00104	Herlihy, Gavan James	herlihy@xtra.co.nz
Hopkins Jim	00420	Jim Hopkins	jimhop46@gmail.com
Horticulture New Zealand	00236	Rachel McClung	rachel.mcclung@hortnz.co.nz
Infinity Investment Group Holdings Limited	00414	Sarah Eveleigh	sarah.eveleigh@al.nz
Kāi Tahu ki Otago / Aukaha	00226	Kate Timms-Dean	kate@aukaha.co.nz
		Sandra McIntyre	sandra@aukaha.co.nz

LAC Properties Trustees Limited	00211	Laura McLaughlan Maree Baker-Galloway	laura.mclaughlan@al.nz maree.baker-galloway@al.nz
Lane Hocking	00210	Laura McLaughlan Maree Baker-Galloway	laura.mclaughlan@al.nz maree.baker-galloway@al.nz
Manuherekia Catchment Group	00116	Susie KcKeague	susie@mckconsultancy.co.nz
Maryhill Limited	00118	Laura McLaughlan Maree Baker-Galloway	laura.mclaughlan@al.nz maree.baker-galloway@al.nz
McArthur Ridge Vineyard Ltd	00403	Robin Schulz	Robin@nimbusgroup.co.nz
Meridian Energy Limited	00306	Andrew Feierabend	andrew.feierabend@meridianenergy.co.nz
Minister for the Environment	00136	Macaela Flanagan	Macaela.flanagan@mfe.govt.nz
Mt Cardrona Station	00114	Laura McLaughlan Maree Baker-Galloway	laura.mclaughlan@al.nz maree.baker-galloway@al.nz
Network Waitaki Limited	00320	Megan Justice	megan.justice@mitchelldaysh.co.nz
New Zealand Cherry Corp Ltd	00413	Sarah Eveleigh	sarah.eveleigh@al.nz
New Zealand Infrastructure Commission	00321	Robert Addison	Robert.addison@tewaihang.govt.nz
New Zealand Pork Industry Board	00240	Penny Cairns	penny.cairns@pork.co.nz
Oceana Gold (New Zealand) Ltd	00115	Alison Paul Pip Walker	alison.paul@oceanagold.com pip.walker@environmentlaw.nz
Otago Fish & Game Council and the Central South Island Fish & Game Council	00231	Nigel Paragreen Angela Christensen	nparagreen@fishandgame.org.nz achristensen@fishandgame.org.nz
Pomahaka Water Care Group	00207	Lloyd McCall	lloyd@m90fs.co.nz
Port of Otago Ltd.	00301	Rebecca McGrouther	rmcgrouter@portotago.co.nz
PowerNet Ltd	00511	Megan Justice	megan.justice@mitchelldaysh.co.nz
Queenstown Lakes District Council	00138	Erin Auchterlonie	Erin.auchterlonie@qldc.govt.nz
Ravensdown Limited	00121	Carmen Taylor	carmen@planzconsultants.co.nz
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230	Rick Zwaan	r.zwaan@forestandbird.org.nz
Silver Fern Farms	00221	Steve Tuck	steve.tuck@mitchelldaysh.co.nz

Skinner, Evelyn	00317	Evelyn Skinner	Evelynm.skinner1@gmail.com
Sole Matthew	00508	Matthew Sole	solem@xtra.co.nz
Stewart, Lynne	00030	Lynne Stewart	phil.lynne2@xtra.co.nz
Strath Clyde Water Ltd, McArthur Ridge Investment Group Ltd and Mount Dunstan Estates Ltd	00404	Norman Elder	Norman.elder@awslegal.co.nz
Te Ao Marama	00223	Maria Bartlett	Maria.Bartlett@tami.maori.nz
Te Rūnanga o Ngāi Tahu	00234	Tanya Stevens	Tanya.Stevens@ngaitahu.iwi.nz
Toitū Te Whenua, Land Information New Zealand	00101	Dr. Ini-Isabée Gunn	IGunn@LINZ.govt.nz
Transpower New Zealand	00314	Ainsley McLeod	ainsley@amconsulting.co.nz
Trojan Holdings Limited (Trojan)	00206	Ben Farrell	ben@cuee.nz
Universal Developments Hawea Limited	00209	Laura McLaughlan Maree Baker- Galloway	laura.mclaughlan@al.nz maree.baker-galloway@al.nz
Waitaki District Council	00140	Victoria van der Spek	vvanderspek@waitaki.govt.nz
Waitaki Irrigators Collective Limited	00213	Fraser McKenzie	admin@waitakiirrigators.co.nz
Waka Kotahi NZ Transport Agency	00305	Richard Shaw	richard.shaw@nzta.govt.nz EnvironmentalPlanning@nzta.govt.nz
Wayfare Group Limited	00411	Fiona Black (Submitter) Ben Farrell (copy to)	fblack@realjourneys.co.nz ben@cuee.nz
Wise Response Society Inc	00509	Professor Elizabeth Slooten	secretary@wiseresponse.org.nz
Yellow – eyed Penguin Trust	00120	Trudi Webster	science-advisor@yeptrust.org.nz



Bridget Irving

Counsel for OWRUG

Dated **12 November 2021**

Address for Service: 123 Vogel Street
PO Box 1453
Dunedin 9054

Telephone: 03 477 7312

Email: bridget.irving@gallawaycookallan.co.nz
simon.pierce@gallawaycookallan.co.nz

APPENDIX 1

The particular parts of the submission I support (or oppose) are:

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].
00206.003 (Trojan), 00411.007 (Wayfare), 00211.002 (LAC), 00210.002 (Lane Hocking), 00118.003 (Maryhill), 00014.003 (Mt Cardrona), 00209.002 (UDHL), 00231.099 (F+G)	<i>Neutral</i>	The changes requested may affect the clarity and certainty of the RPS document as a whole. The relief sought needs to be considered in light of other changes sought because it may have consequential or unintended effects	Disallow
00226.006 (KtKO), 00509.002 (Wise), 00509.017	<i>Neutral</i>	<i>The impact of climate change looms large and will be an important consideration during the life of this RPS</i>	<i>Allow, subject to relief sought by OWRUG in their submission.</i>
00230.003 F+B	<i>Provisionally support</i>	<i>The effects management hierarchy is a clear tool to managing activities. It needs to appropriately account for the functional and operational needs of activities however</i>	<i>Allow, subject to relief sought by OWRUG</i>
00239.194 (FFNZ)	<i>Support</i>	<i>The hierarchy of obligations applies to freshwater management, not to other domains.</i>	Disallow

00237.074 (B+L)	<i>Support</i>	<i>Submissions seeks relief similar to OWRUG and for similar reasons</i>	<i>Allow</i>
00239.195, 00239.196, 00239.198, 00239.199, 00239.202, 00239.201 (FFNZ)	<i>Support</i>	<i>Submissions seeks relief similar to OWRUG and for similar reasons</i>	<i>Allow</i>
00231.096, 00231.002, 00231.003, 00231.004, 00231.006, 00231.008, 00231.012 (F+G)	<i>Oppose</i>	<i>Submissions are wide ranging and extensive with lack of detail about relief sought. It is therefore difficult to assess the potential consequences or merits of relief sought. Nature of the relief has the potential to significantly alter the provisions of the PORPS in ways relevant and potentially in opposition to the relief sought by OWRUG</i>	<i>Disallow</i>
00509.003, 00509.006, 00509.009, 00509.001, 00509.011 00509.045 (WR)	<i>Oppose</i>	<i>Submissions are wide ranging and extensive with lack of detail about relief sought. It is therefore difficult to assess the potential consequences or merits of relief sought. Nature of the relief has the potential to significantly alter the provisions of the PORPS in ways relevant and potentially in opposition to the relief sought by OWRUG</i>	<i>Disallow</i>
00226.002 (KTkO)	<i>Neutral/Oppose</i>	<i>Amendments that define mana whenua values have potential consequential effects that may affect the relief sought by OWRUG</i>	<i>Allow, subject to relief sought by OWRUG</i>
00226.003, (KTkO)	<i>Neutral/Oppose</i>	<i>Unclear what the consequences of this amendment will be.</i>	<i>Disallow, subject to clarification</i>
00223.001, 00223.002, 00223.003 (TAMI)	<i>Neutral/Oppose</i>	<i>Unclear what the consequences of these amendment will be.</i>	<i>Disallow, subject to clarification</i>
00236.002, 00236.003, 00236.004 (Hort NZ)	<i>Support</i>	<i>Concerns raised in submission are similar to those expressed by OWRUG. Relief</i>	<i>Allow</i>

		<i>sought by Submitter may also addresses (at least in part) some of the concerns raised by OWRUG</i>	
00237.001 (B&L)	<i>Support</i>	<i>Concerns raised in submission are similar to those expressed by OWRUG. Relief sought by Submitter may also addresses (at least in part) some of the concerns raised by OWRUG</i>	<i>Allow</i>
00239.197 (FFNZ)	<i>Support</i>	<i>Consistent with submissions of OWRUG</i>	<i>Allow</i>
00236.005 (Hort NZ)		<i>Concerns raised in submission are similar to those expressed by OWRUG. Relief sought by Submitter may also addresses (at least in part) some of the concerns raised by OWRUG</i>	<i>Allow</i>
00239.192 (FFNZ), 00236.111 (Hort NZ), 00226.024 (KTkO), 00140.003 (Waitaki DC)	<i>Support</i>	<i>Consistent and correct approach to use of te reo Māori would be beneficial for all users. Glossary of terms would assist in achieving certainty and in interpretation of the document.</i>	<i>Allow</i>
00508.004 (Sole M), 00508.005 (Sole M) 00206.004 (Trojan), 00411.008 (Wayfare)	<i>Oppose</i>	<i>The terms referred to are clear and well understood. No specific amendments set out to it is not possible to determine whether relief would improve things</i>	<i>Disallow, subject to clarification</i>
00231.005 (F+G)	<i>Neutral/Oppose</i>	<i>Unclear what the consequences of submission will be.</i>	<i>Disallow, subject to clarification</i>
00230.002 (F+B)	<i>Oppose</i>	<i>Requested amendment is ambiguous. Term environmental limits is preferred as it will follow balance of planning processes</i>	<i>Disallow</i>
00508.006 (Sole M)	<i>Support/Oppose</i>	<i>Clarity regarding terminology is important, also OWRUG are not supportive of the use of environmental</i>	<i>Allow in part</i>

		<i>limits in all circumstances. Context is important</i>	
00236.096 (Hort NZ)	<i>Support</i>	<i>Change would improve clarity, particularly given importance of Rural activities and issues to be managed with respect to them.</i>	<i>Allow</i>
00211.054 (LAC), 00210.054 (L Hocking), 00209.054 (UDHL), 00206.001 (Trojan), 00411.002 (Wayfare)	<i>Support</i>	<i>Diversification will be important to allow food and fibre producers to remain viable and adapt.</i>	<i>Allow</i>
00411.004 (Wayfare)	<i>Neutral</i>	<i>Agree that the issue identified is a key issue for the region and that greater direction as to how this will be address would be beneficial. As no relief is specified OWRUG cannot express a final view on whether it supports what is sought</i>	<i>Allow in principle</i>
00411.005, 00411.006 (Wayfare)	<i>Support</i>	<i>This is an issue that effects OWRUG members</i>	<i>Allow</i>
00509.012 (Wise)	<i>Oppose</i>	<i>The concept of Te Oranga o te Taiao is not a feature of the RMA currently.</i>	<i>Disallow</i>
00137.004 (DoC)	<i>Neutral/Oppose</i>	<i>Such an addition may be beneficial, but to do so it must cover the field including information on land use capability etc as well as terrestrial eco systems.</i>	<i>Allow in principle, subject to further elaboration</i>
00420.001 (Hopkins, J), 00420.002 (Hopkins, J), 00231.013 (F+G), 00213.003 (Fonterra), 00236.007 (Hort NZ), 00239.001 (FFNZ)	<i>Support</i>	<i>Agree that this is a useful addition</i>	<i>Allow</i>
00509.008 (Wise)	<i>Oppose</i>	<i>The proposed amendments reflect the philosophical position of Wise Response,</i>	<i>Disallow</i>

		<i>rather than an articulating the resource management purpose</i>	
00239.001 (FFNZ), 00236.008 (Hort NZ)	<i>Support</i>	<i>OWRUG supports their being greater recognition of the agriculture sector (referred to as Food and Fibre in its own submission_, that there needs to be greater recognition of the food production potential within Otago</i>	<i>Allow</i>
00239.005 (FFNZ)	<i>Support</i>	<i>Reference to landowners and catchment groups is a useful addition</i>	<i>Allow</i>
00231.007 (F+G)	<i>Neutral/Oppose</i>	<i>The proposed definition may be useful, but in the absence of specific wording an assessment cannot be made.</i>	<i>Disallow, subject to clarification</i>
00231.009 (F+G)	<i>Neutral/Oppose</i>	<i>Context is important and the term 'environmental limits' may not be appropriate in all places</i>	<i>Disallow</i>
00231.098 (F+G)	<i>Support</i>	<i>Consistent definitions should be used where possible</i>	<i>Allow</i>
00509.016 (Wise)	<i>Neutral/oppose</i>	<i>A definition this term may be helpful, but proposed definition is uncertain. OWRUG consider the word is readily understood without a definition.</i>	<i>Disallow</i>
00237.006 (B+L)	<i>Neutral</i>	<i>A definition may be helpful, but would require careful consideration is it may not age well.</i>	<i>Disallow, subject to clarification</i>
00509.019 (Wise)	<i>Oppose</i>	<i>This concept is encapsulated in more commonly understood terms. Definition is not necessary or helpful</i>	<i>Disallow</i>
00140.002 (Waitaki DC)	<i>Neutral/Support</i>	<i>If Plantation and Carbon Forestry are to be treated differently it will be important to be able to determine one from the other</i>	<i>Allow, subject to clarification</i>

00509.021 (Wise)	<i>Oppose</i>	<i>'Enhancement' is a term with general application. The definition would be of narrow application which may create difficulties</i>	<i>Disallow</i>
00509.022 (Wise)	<i>Oppose</i>	<i>Environment is defined in the Act. The proposed definition is inconsistent</i>	<i>Disallow</i>
00502.006 (AWA)	<i>Oppose</i>	<i>Efficient is used broadly in the RMA context. The definition is incomplete</i>	<i>Disallow</i>
00236.011 (Hort NZ)	<i>Neutral/Support</i>	<i>Such a definition may assist in interpreting and applying the hierarchy of priorities within the NPSFM. Careful consideration of this is required</i>	<i>Allow, subject to clarification.</i>
00509.014 (Wise)	<i>Oppose</i>	<i>Definition is incomplete and unhelpful. The whole RPS is intended to achieve this outcome</i>	<i>Disallow</i>
00226.038 (KTkO), 00420.007 (Hopkins J), 00119.035(BLGL), 00231.017 (F+G), 00411.015 (Wayfare), 00411.100 (Wayfare), 00120.010 (YePT), 00138.030 (QLDC), 00138.050 (QLDC), 00226.028 (KTkO), 00226.029 (KTkO), 00226.030 (KTkO), 00226.031 (KTkO), 00226.037 (KTkO) (Wāhi tupuna)	<i>Neutral/Oppose</i>	<i>Definitions of these terms are helpful, subject to being clear and certain. The definitions sought may affect the meaning of other provisions of interest to OWRUG</i>	<i>Allow, subject to clarification</i>
00509.015, 00509.023 (Wise)	<i>Oppose</i>	<i>This definition is wide ranging and includes a wide variety of concepts that are not clear or certain.</i>	<i>Disallow</i>

00231.016 (F+G), 00411.016 (Wayfare), 00230.010 (F+B), 00223.020 (TAMI), 00137.014 (DoC)	<i>Oppose</i>	<i>It is unclear what the consequences of this definition is or is intended to be.</i>	<i>Disallow</i>
00509.018 (Wise)	<i>Oppose</i>	<i>This definition is wide ranging and includes a wide variety of concepts that are not clear or certain.</i>	<i>Disallow</i>
00301.037, 00301.038, 00301.036 (PoOL) (New Infrastructure)	<i>Neutral/Oppose</i>	<i>The proposed new definition may have consequences for provisions that OWRUG has an interest in. It is not apparent whether the definition is necessary to achieve the submitters intended outcome. The proposed definition has potential to create inconsistencies with other planning standard definitions.</i>	<i>Allow, subject to clarification</i>
00139.114 (DCC) (Off-stream storage of surface water)	<i>Neutral/Oppose</i>	<i>The proposed new definition may have consequences for provisions that OWRUG has an interest in. It is not apparent whether the definition is necessary to achieve the submitters intended outcome.</i>	<i>Allow, subject to clarification</i>
00231.018 (F+G), 00213.013 (WICL) (Precautionary approach)	<i>Neutral/Oppose</i>	<i>The proposed new definition may have consequences for provisions that OWRUG has an interest in</i>	<i>Disallow, subject to clarification</i>
00213.006 (Fonterra), 00213.005 (Fonterra), 00305.005 (WK NZTA), 00213.007 (Fonterra), 00411.019 (Wayfare), 00213.015 (WICL), 00237.008 (B+L), 00315.008 (Aurora), 00321.006 (NZIC), 00511.007(PowerNet), 00305.004 (WK NZTA)	<i>Support</i>	<i>Would assist in applying and interpreting provisions</i>	<i>Allow</i>

00231.019 (F+G)	<i>Oppose</i>	<i>Proposed definition is not clear or certain</i>	<i>Disallow</i>
00139.005b (DCC), 00306.012 (Meridian), 00139.005a (DCC)	<i>Neutral/Oppose</i>	<i>Definition has potential to affect matters of interest to OWRUG depending on its scope.</i>	<i>Allow, subject to clarification</i>
00137.008 (DoC)	<i>Support</i>	<i>Agree with the concerns raised by submitters</i>	<i>Allow</i>
00137.009 (DoC), 00306.001 (Meridian), 00321.002 (NZIC), 00230.005 (F+B), 00315.004 (Aurora), 00321.001 (NZIC), 00223.018 (TAMI)	<i>Neutral</i>	<i>Definitions has potential to affect matters of interest to OWRUG, there are differences between submitters and consistency and certainty is sought</i>	<i>Allow, subject to clarification</i>
00320.003, 00320.005, (NWL) 00321.003 (NZIC), 00511.005 (PowerNet), 00315.005 (Aurora), 00305.001 (WK NZTA)	<i>Neutral</i>	<i>Definitions has potential to affect matters of interest to OWRUG, there are differences between submitters and consistency and certainty is sought</i>	<i>Allow, subject to clarification</i>
00306.003 (Meridian)	<i>Support</i>	<i>Definition is unnecessary</i>	<i>Allow</i>
00409.012 (Ballance A-N)	<i>Support</i>	<i>Consistent definitions are helpful</i>	<i>Allow</i>
00223.021 (TAMI)	<i>Neutral/Oppose</i>	<i>Definition has potential to affect matters of interest to OWRUG depending on its scope and consequences for the meaning of affected provisions</i>	<i>Allow, subject to clarification</i>
00237.004 (B+L), 00322.002 (FH), 00226.033 (KTkO)	<i>Neutral/Oppose</i>	<i>OWRUG proposed alternative term of Food and Fibre Sector. The definition has potential to affect matters of interest to OWRUG depending on its scope and consequences for the meaning of affected provisions</i>	<i>Allow, subject to clarification and depending on outcome of relief sought by OWRUG.</i>

00121.009 (Ravensdown)	<i>Neutral/Oppose</i>	<i>Definition has potential to affect matters of interest to OWRUG depending on its scope and consequences for the meaning of affected provisions</i>	<i>Allow, subject to clarification</i>
00213.008 (Fonterra), 00213.002 (WICL), 00213.010 (Fonterra) (Te Mana o te Wai)	<i>Support</i>	<i>Agree with proposal raised by submitters</i>	<i>Allow</i>
00306.007 (Meridian), 00230.012 (F+B), 00230.014 (F+B), 00206.014 (Trojan), 00411.021 (Wayfare), 00236.014 (Hort NZ) (rural area), 00221.001(SFF), 00206.012(Trojan) (rural industry), 00213.009 (Fonterra) (sensitive activity) 00137.016(DoC), 00226.035 (KTkO), 00306.009 (Meridian), 00230.016 (F+B), 00223.022 (TAMI), 00237.007 (B+L) (Significant Natural Area)	<i>Neutral/Oppose</i>	<i>Definition has potential to affect matters of interest to OWRUG depending on its scope and consequences for the meaning of affected provisions</i>	<i>Allow, subject to clarification</i>
00119.034 (BLGL), 00206.011 (Trojan), 00411.018 (Wayfare)	<i>Neutral/Oppose</i>	<i>Definition has potential to affect matters of interest to OWRUG depending on its scope and consequences for the meaning of affected provisions. OWRUG is concerned the proposed definition will not</i>	<i>Disallow</i>

		<i>suit all context within which the term will be used.</i>	
00226.329 (KTkO)	<i>Neutral/ Oppose</i>	<i>Unclear what is being sought or the effects of it for the operation of the balance of the RPS.</i>	<i>Disallow</i>
00239.015b (FFNZ) (MW – Mana whenua)	<i>Support</i>	<i>Agree that proposed relief would be helpful</i>	<i>Allow</i>
00226.040 (KTkO)	<i>Neutral/Oppose</i>	<i>The relief per se is not necessarily opposed, but OWRUG seek to understand what the consequential effect of it may be in relation to the operative provisions of the RPS</i>	<i>Disallow, subject to clarification</i>
00226.049 (KTkO)	<i>Oppose</i>	<i>Proposed amendments are overly directive which will compromise the ability of other factors to be adequately provided for to support sustainable management</i>	<i>Disallow</i>
00223.033 (TAMI)	<i>Oppose</i>	<i>Amendment is unhelpful and will likely undermine the desired outcome</i>	<i>Disallow</i>
00223.036, 00223.037 (TAMI)	<i>Oppose</i>	<i>Inconsistent with relief sought by OWRUG and statutory language which will create confusion</i>	<i>Disallow</i>
00202.002 (COES)	<i>Oppose</i>	<i>Unclear what is being sought or the effects of it for the operation of the balance of the RPS. Also, the basis of the submission is inaccurate</i>	<i>Disallow</i>
00136.002 (MfE), 00231.021 (F+G)	<i>Neutral/Oppose</i>	<i>Unclear what is being sought or the effects of it for the operation of the balance of the RPS.</i>	<i>Disallow, subject to clarification</i>
00206.078 (Trojan)	<i>Support</i>	<i>Agree that this discussion is necessary to ensure all aspects of sustainable management are captured in the SRMR</i>	<i>Allow</i>

00310.003 (Telcos) 00213.018 (Fonterra) 00236.033 (Hort NZ) 00411.097 (Wayfare) 00239.019 (FFNZ)	<i>Support</i>	<i>Agree that this discussion is necessary to ensure all aspects of sustainable management are captured in the SRMR</i>	<i>Allow</i>
00231.022 (F+G) 00226.057 (KTkO)	<i>Neutral/Oppose</i>	<i>Agree that this discussion is helpful to ensure all aspects of sustainable management are captured in the SRMR, proposed relief is not clear but does not appear to be complete.</i>	<i>Disallow, subject to clarification</i>
00231.023 (F+G)	<i>Oppose</i>	<i>Distinction between native and introduce species is important and consistent with the Act</i>	<i>Disallow</i>
00231.024 (F+G)	<i>Neutral/Oppose</i>	<i>Amendment may be appropriate, but also needs to address the fact that such works will have positive effects too</i>	<i>Disallow, subject to clarification</i>
00101.007, 00101.008, 00101.009 (LINZ)	<i>Support</i>	<i>Agree that discussion of climate change effects is overly narrow</i>	<i>Allow, subject to clarification</i>
00237.010 (B+L) 00239.023 (FFNZ) 00213.015, 00213.016 (Fonterra) 00236.025 (Hort NZ)	<i>Support</i>	<i>Agree that impacts of urban development on rural productivity not adequately addressed</i>	<i>Allow</i>
00202.003 (COES)	<i>Oppose</i>	<i>Inconsistent with relief sought by OWRUG, in particular the need for transitions</i>	<i>Disallow</i>
0213.017, 00213.019 (Fonterra) 00236.026 (Hort NZ)	<i>Support</i>	<i>OWRUG agree it is important the significance of water use is discussed and need for changes to occur</i>	<i>Allow</i>

00240.008 (NZ Pork)			
00213.003 (WIC)			
00101.018 (LINZ)			
00223.044 (TAMI)	<i>Oppose</i>	<i>Directly conflicts with the relief sought by OWRUG and contains drafting issues OWRUG raised in its original submission.</i>	<i>Disallow</i>
00202.004, 00202.005, 00202.006 , 00202.007, 00202.008 , 00202.009 (COES) 00101.017 (LINZ)	<i>Oppose</i>	<i>Proposed addition is overly simplistic and therefore does not assist. Such amendments would call for further additions in relation to all activities that might have effects. Issues are best left to be dealt with at FMU level.</i>	<i>Disallow</i>
00239.025 (FFNZ)	<i>Support</i>	<i>Suggested further context is helpful</i>	<i>Allow</i>
00231.027 (F+G) 00230.026(F+B)	<i>Neutral/Oppose</i>	<i>Additions proposed needs to be supported by further additions that recognise how anthropogenic activities may have protected communities of naïve fish</i>	<i>Disallow, subject to clarification</i>
00101.019 (LINZ)	<i>Neutral</i>	<i>Unclear what is proposed in relief sought</i>	<i>Allow/Disallow</i>
00318.004, 00318.008 (Contact) 00306.017 (Meridian)	<i>Support</i>	<i>Agree with the sentiment of the submission.</i>	<i>Allow</i>
00202.01 (COES) 00509.027 (WISE)	<i>Oppose</i>	<i>Such a blanket statement is inappropriate. Need for such an approach should be determined at FMU level</i>	<i>Disallow</i>
00226.005 (KtKO) 00202.012, 00202.011 (COES)	<i>Neutral/Oppose</i>	<i>Unclear what is being sought by submission, therefore not possible to assess appropriateness of relief sought</i>	<i>Disallow, subject to clarification</i>

00213.022, 00213.021 (Fonterra) 00322.008 (Fulton Hogan) 00014.015 (Mt Cardrona)	<i>Support</i>	<i>OWRUG agrees that provisions need to recognise the benefits that accrue from regionally significant industry and/or benefits of use and development</i>	<i>Allow</i>
00509.032, 00509.030 (WISE)	<i>Oppose</i>	<i>Provisions contains concepts that are unclear and not helpful in the RMA context</i>	<i>Disallow</i>
00231.03(F+G) 00230.028 (F+B)	<i>Oppose</i>	<i>Introduces te mana o te wai hierarchy into all resource management which is not appropriate</i>	<i>Disallow</i>
00137.039 (DoC) 00239.035 (FFNZ) 00211.005 (LAC), 00210.005 (Hocking) 00118.006 (Maryhill) 00014.006 (Mt Cardrona)	<i>Support</i>	<i>Agree with the sentiment of the submission if provision is to be retained</i>	<i>Allow</i>
00121.017 (Ravensdown)	<i>Support</i>	<i>Provision contains concepts that are unclear making it difficult to ascertain intended outcome</i>	<i>Allow</i>
00230.030 (F+B)	<i>Oppose</i>	<i>Provision contains concepts that are unclear making it difficult to ascertain intended outcome</i>	<i>Disallow</i>
00237.020 (B+L)	<i>Support</i>	<i>Agree with the sentiment of the submission</i>	<i>Allow</i>
00230.031 F+B	<i>Oppose</i>	<i>Addition is unnecessary</i>	<i>Disallow</i>
00223.055 (TAMI)	<i>Oppose</i>	<i>Descriptive constraints are not certain, not appropriate to apply them in the manner sought by the amendment</i>	<i>Disallow</i>

00101.020 (LINZ)	<i>Support</i>	<i>Agree with the sentiment of the submission, particularly given the lack of clear 'constraints' within the RPS.</i>	<i>Allow</i>
00101.021 (LINZ)	<i>Oppose</i>	<i>Unclear what 'foreseeable' provisions are. Not appropriate to allow provisions that are yet to be operative in accordance with the Act</i>	<i>Disallow</i>
00509.033 (Wise)	<i>Oppose</i>	<i>Amendment introduces uncertainty</i>	<i>Disallow</i>
00139.027 (DCC) 00239.036 (FFNZ) 00236.036 (HortNZ) 00101.023(LINZ)	<i>Support</i>	<i>Agree with the sentiment of the submission if provision is to be retained</i>	<i>Allow, if OWRUG primary relief no accepted</i>
00230.033 (F+B) 00206.016 (trojan) 00411.026 Wayfare	<i>Oppose</i>	<i>If provision to be retained relief is inconsistent with the theme of a transition discussed in OWRUG submission</i>	<i>Disallow</i>
00137.041 (DoC)	<i>Oppose</i>	<i>Relief is inconsistent with the Act</i>	<i>Disallow</i>
00239.037 (FFNZ)	<i>Support</i>	<i>Agree that decision making needs to be informed by robust data</i>	<i>Allow</i>
00226.092 (KtkO)	<i>Support</i>	<i>Agree the impacts of climate change are relevant</i>	<i>Allow</i>
00211.006, 00211.055 (LAC) 00210.006, 00210.055 (Hocking) 00118.007, 00118.008 (Maryhill) 00014.007, 00014.008 (Mt Cardrona)	<i>Support</i>	<i>Agree that provisions should reflect Part II.</i>	<i>Allow</i>

00231.034 (F+G) 00230.034 (F+B) 00509.034 (Wise)	<i>Neutral/Oppose</i>	<i>Unclear what 'resilient' is intended to mean here and how it will be measured. Consider that Amendments to (5) and (6) are unnecessary as setting of limits is addressed elsewhere. Unclear what limits are being promoted for some matters</i>	<i>Disallow, subject to clarification</i>
00407.014 (GP)	<i>Oppose</i>	<i>Unclear what is being proposed in Submission</i>	<i>Disallow, subject to clarification</i>
00226.093 (KtKO)	<i>Oppose</i>	<i>Change is unnecessary, is it is already inherent in interconnected systems</i>	<i>Disallow</i>
00231.035, 00231.036 (F+G)	<i>Oppose</i>	<i>For the same reasons as oppose definition of 'natural environment', distinction drawn between natural and physical resources is false and creates uncertainty</i>	<i>Disallow</i>
00509.035 (Wise)	<i>Oppose</i>	<i>Relief introduces concepts which are not clear or certain</i>	<i>Disallow</i>
00137.042 (DoC)	<i>Oppose</i>	<i>Disagree with the precautionary principle being included in the RPS as proposed</i>	<i>Disallow</i>
00213.023 (Fonterra)	<i>Support</i>	<i>Agree with submission that robust data should be used. Council's failure to gather good data in a timely way is responsible for many of the issues that need to be addressed by this RPS.</i>	<i>Allow</i>
00239.039 (FFNZ) 00234.011 (TRoNT)	<i>Support</i>	<i>Agree that Climate change impacts need to be managed</i>	<i>Allow</i>
00201.004, 00201.005 (CODC) 00237.021 (B+L)	<i>Support</i>	<i>Consistent with OWRUG's relief that transition needs to be carefully managed</i>	<i>Allow</i>
00407.016, 00407.01 (GP)	<i>Oppose</i>	<i>Agree that a transition needs to be carefully managed, proposed relief is inconsistent with that. Specific responses</i>	<i>Disallow</i>

		<i>need to be determined in action plans and at FMU level.</i>	
00137.043 (DoC)	<i>Neutral/Oppose</i>	<i>Unclear what relief is being sought.</i>	<i>Disallow, subject to clarification</i>
00226.098 (KtKO)	<i>Neutral/Oppose</i>	<i>The outcome being sought by the proposed amendment is unclear</i>	<i>Disallow, subject to clarification</i>
00115.011 (Oceana)	<i>Support</i>	<i>Encouraging grass roots initiatives is supported</i>	<i>Allow</i>
00509.039 (Wise)	<i>Oppose / Support</i>	<i>Submission introduces concepts that are not clear and are uncertain. Agree that there should be support for less carbon intensive initiatives</i>	<i>Disallow /Allow</i>
00306.025, 00306.090 (Meridian)	<i>Support</i>	<i>Agree with need for amendments if provision is to remain</i>	<i>Allow</i>
00139.038 (DCC)	<i>Support</i>	<i>Agree with need for amendments if provision is to remain</i>	<i>Allow</i>
00231.039 (F+G)	<i>Oppose</i>	<i>Proposed changes create confusion and render the provision at odds with others in the RPS</i>	<i>Disallow</i>
00137.046 (DoC)	<i>Support</i>	<i>Agree with utility of incentivising activities that would have the noted effects</i>	<i>Allow</i>
00231.04 (F+G)	<i>Neutral/Oppose</i>	<i>Intention of change may not be an issue, but also needs to recognise functional and operational needs of activities. Consider that 'support' is not a clear term</i>	<i>Disallow, subject to clarification</i>
00239.046 (FFNZ)	<i>Support</i>	<i>Agree with intention of proposed amendments</i>	<i>Allow</i>
00231.042 (F+G)	<i>Oppose</i>	<i>For same reason as oppose definition of natural environment</i>	<i>Disallow</i>
00213.014 (WIC)	<i>Support</i>	<i>Agree that term threshold is currently unclear</i>	<i>Allow</i>

00509.047 (Wise)	<i>Oppose</i>	<i>Amended timeframes are not achievable and not required as existing Higher order documents already address this</i>	<i>Disallow</i>
00231.043 (F+G)	<i>Oppose</i>	<i>Do not consider deletion to be appropriate</i>	<i>Disallow</i>
00201.007 (CODC 0239.048 (FFNZ) 00236.040 (Hort NZ) 00230.037 (F+B)	<i>Support</i>	<i>Agree with sentiment in submission</i>	<i>Allow</i>
00407.025 (GP)	<i>Oppose</i>	<i>Addition is unnecessary</i>	<i>Disallow</i>
00403.001 (McArthur Ridge) 00404.001 (Strath, McArthur, Mt Dustan)	<i>Support</i>	<i>Agree with the concern raised in submission</i>	<i>Allow</i>
00223.004 (TAMI)	<i>Neutral/Oppose</i>	<i>RPS framework is first step in establishing limits etc, as such no need to address period where limits do not exist.</i>	<i>Disallow</i>
00223.005 (TAMI)	<i>Neutral Oppose</i>	<i>Unclear what is being sought and therefore how it may affect OWRUG's interests</i>	<i>Disallow, subject to clarification</i>
00231.01 (F+G)	<i>Oppose</i>	<i>Relief is extremely broad and implications have not been assessed</i>	<i>Disallow</i>
00403.002, 00403.003 McArthur 0404.002 00404.003 (Strath Clyde)	<i>Neutral</i>	<i>Specific recognition of some uses may have unintended consequences within the provisions</i>	<i>Allow, subject to clarification</i>
00509.004 (Wise) 00509.069	<i>Oppose</i>	<i>Unclear what relief is being sought, or what its consequences might be</i>	<i>Disallow</i>

00407.001 (GP)	<i>Oppose</i>	<i>Amendment does not accurately encapsulate fundamental concept of Te Mana o te Wai in a way that reflects the NPSFM</i>	<i>Disallow</i>
00407.006 (GP)	<i>Oppose</i>	<i>Oppose the reference to the precautionary approach, but also consider singular focus on synthetic nitrogen and dairy farming to be inappropriate.</i>	<i>Disallow</i>
00407.007 (GP)	<i>Neutral</i>	<i>Consider methods to support a range of farming methods that reduce environmental impact should be encouraged – beyond organic regenerative farming</i>	<i>Allow, subject to further amendment to broaden the opportunities.</i>
00138.048 (QLDC)	<i>Neutral/Oppose</i>	<i>Guidance on managing water uses may be of assistance, but proposed relief is not clear</i>	<i>Allow, subject to clarification</i>
00223.079, 00226.158 (KTKO and TAMI) 00234.024 (TRONT)	<i>Neutral/Oppose</i>	<i>Amendment may extend provisions to encapsulate coastal waters. Unclear how this will work with Coastal Environment Chapter</i>	<i>Disallow, subject to clarification</i>
00231.045 (F+G)	<i>Neutral/Oppose</i>	<i>Sentiment of the submission is supported, but terminology lacks clarity and certainty</i>	<i>Disallow, subject to clarification</i>
00101.026 (LINZ)	<i>Support</i>	<i>Agree with the sentiment of the submission</i>	<i>Allow</i>
00231.046 (F+G)	<i>Oppose</i>	<i>Amendment significantly expands the class of activities in Tier 2, not clear that this reflects the NPSFM</i>	<i>Disallow</i>
00234.026 (TRONT)	<i>Oppose</i>	<i>Unclear how this proposed addition will dovetail with te mana o tew ai obligations</i>	<i>Disallow</i>
00101.027 (LINZ)	<i>Neutral/Oppose</i>	<i>Intended outcome for proposed amendment is not clear, but may have wide reaching consequences for land and water users</i>	<i>Disallow</i>

00137.063 (DOC) 00509.070 (Wise)	<i>Oppose</i>	<i>Amendment is unnecessary considering IM Policies. Addition such as this creates interpretive uncertainty</i>	<i>Disallow</i>
00202.014 (COES)	<i>Oppose</i>	<i>Given highly directive nature of provision sought, it is not appropriate in and RPS. Such methods may not be necessary throughout Otago</i>	<i>Disallow</i>
0226.161 (KTKO)	<i>Oppose</i>	<i>Intended outcome for proposed amendment is not clear, but may have wide reaching consequences for land and water users</i>	<i>Disallow</i>
00230.075 (F+B) 00230.075 (F+G)	<i>Oppose</i>	<i>Restoration (in the sense a system goes back to natural state) may not be possible. Other proposed additions are inconsistent with the relief sought by OWRUG, particularly with respect to the need to a transition from current state to that desired pursuant to the visions</i>	<i>Disallow</i>
00213.034 (Fonterra)	<i>Support</i>	<i>Agree that there needs to be an acknowledgement that people use water</i>	<i>Allow</i>
00234.027 (TRONT)	<i>Neutral / Oppose</i>	<i>Restoration (in the sense a system goes back to natural state) may not be possible</i>	<i>Disallow, subject to clarification</i>
00409.005 (Balance)	<i>Support</i>	<i>Agree that proposed drafting improves clarity</i>	<i>Allow</i>
00231.048 (F+G)	<i>Oppose</i>	<i>Unclear what addition of P5 seeks to achieve</i>	<i>Disallow</i>
00223.081 (TAMI)	<i>Support</i>	<i>Consistent gathering of this information would be useful to inform decision making</i>	<i>Allow</i>
00223.082 (TAMI) 00226.165 (KTKO)	<i>Support</i>	<i>Agreement with the sentiment of the submission</i>	<i>Allow</i>
00223.084 (TAMI) 00230.077 (F+B)	<i>Neutral/Oppose</i>	<i>Complete restoration may not be achievable – improvement would be more appropriate</i>	<i>Disallow</i>

00509.072 (Wise)			
00226.010 00226.171 (KTKO) 00230.078, 00230.079, 00230.080, 00230.081, 00230.082, 00230.083 (F+B) 00231.05 (F+G) 00508.008 (Sole)	<i>Oppose</i>	<i>Uniform timeframes may not be appropriate as changes required will vary in scale and complexity. Relief sought inconsistent with need for carefully managed transition sought by OWRUG. General relief undermines the FMU based approach required by Freshwater Management Unit Visions</i>	<i>Disallow</i>
00226.167 (KTKO)	<i>Neutral/Oppose</i>	<i>General nature of relief may have different consequences in different catchments.</i>	<i>Oppose subject to clarification</i>
00030.014 (Stewart) 00202.019 (Coes) 00226.168, 00226.169, 00226.170 (KTKO) 00317.001 (Skinner) 00509.074 (Wise)	<i>Oppose</i>	<i>Timeframe sought likely to result in significant effects on social and economic wellbeing and inconsistent with need for a careful transition</i>	<i>Oppose</i>
00116.001, 00116.002, 00116.004, (MCG) 00121.051 (Ravensdown) 00318.011 (Contact)	<i>Support</i>	<i>Support the intentions of the submissions</i>	<i>Allow</i>
00136.004 (MfE) 00136.005 (MfE) 00234.030	<i>Neutral</i>	<i>Want to ensure clarity about this as it is unlikely that the entire Clutha FMU is overallocated. Transition steps are likely to be useful subject to them being achievable</i>	<i>Allow, subject to clarification</i>
00137.064 (DoC) 00137.065	<i>Neutral/Oppose</i>	<i>Intention is supported, subject to appropriate drafting and integration with other changes</i>	<i>Allow, subject to clarification</i>

00202.016, 00202.02 (COES) 00226.168 (KTKO)	<i>Oppose</i>	<i>Changes have similar issues identified elsewhere regarding restoration ability and link to human contact may not be consistent with targets in other provisions</i>	<i>Disallow</i>
00202.017 (COES) 00226.168 (KTKO)	<i>Neutral/Oppose</i>	<i>It is not practicable to require abstraction from mainstems in all cases. Provision needs to address this if it is to be included</i>	<i>Disallow</i>
00140.017 (WDC)	<i>Oppose</i>	<i>Unclear what is intended by proposed amendment as it is overly broad</i>	<i>Disallow</i>
00226.169, 00226.171 (KTKO)	<i>Oppose</i>	<i>Requirement for no further change in the shape and behaviour of water bodies is overly directive</i>	<i>Disallow</i>
00104.005 (Herlihy)	<i>Support</i>	<i>Agree with the sentiment of the submission</i>	<i>Allow</i>
00137.067, 00137.068 (DoC)	<i>Oppose</i>	<i>Unclear what relief is being sought</i>	<i>Disallow</i>
00239.077, 00239.078 00239.079, 00239.080, 00239.081 (FFNZ)	<i>Support</i>	<i>Consistent with OWRUG's submission important for objectives to include reference to primary production etc</i>	<i>Allow</i>
00237.029 (B+L)	<i>Support</i>	<i>Agree with intention of submission</i>	<i>Allow</i>
00030.016, 00030.017 (Stewart) 00202.021, 00202.022 (COES)	<i>Oppose</i>	<i>It is not clear what is being sought and therefore the outcome cannot be assessed</i>	<i>Disallow</i>
00407.034 (GP)	<i>Neutral/Oppose</i>	<i>Agree with the need for a transition, but oppose the examples included. It is also not appropriate to enshrine Government Policy without its specifics going through the RMA process. Reference to the Essential Freshwater Reforms should not be included.</i>	<i>Disallow</i>

00138.081 (QLDC) 00502.008, 00502.005 (AWA)	<i>Support</i>	<i>Agree with the tenor of the requested relief, subject to refinement</i>	<i>Allow, subject to clarification</i>
00407.045, 00407.039 (GP) 00509.074 (Wise)	<i>Oppose</i>	<i>Concerned about the practical ability to 'restore'.</i>	<i>Disallow</i>
00137.070 (DOC)	<i>Neutral/oppose</i>	<i>The proposed relief needs to be considered in the context of other provisions and its potential consequences</i>	<i>Disallow, subject to clarification</i>
00202.023 (COES)	<i>Oppose</i>	<i>Relief is inconsistent with Part II</i>	<i>Oppose</i>
00207.002 (PWCG) 00213.019 (WIC)	<i>Support</i>	<i>Agree that connections to be maintained should be those that exist naturally</i>	<i>Allow</i>
00306.033 (Meridian) 00318.012 (Contact)	<i>Support</i>	<i>Agree that relevant clause can be problematic where Dams are concerned.</i>	<i>Allow</i>
00407.035, 00407.036, 00407.037 (GP) 00509.074 (Wise)	<i>Oppose</i>	<i>Changes proposed introduce terms and concepts that are unclear and uncertain</i>	<i>Disallow</i>
00101.034 (LINZ) 00137.071 (DOC) 00206.030 (Trojan) 00226.180 (KTKO) 00231.054 (F+G) 00237.033 (B+L) 00322.019(FH)	<i>Neutral</i>	<i>Wide range of changes sought with potentially competing outcomes that may be of consequence to OWRUG</i>	<i>Disallow, subject to clarification</i>
00237.034 (B+L)	<i>Support</i>	<i>Agree with solution set out in submission</i>	<i>Allow</i>
00101.035 (LINZ)	<i>Oppose</i>	<i>Do not agree that relief promoted improves direction</i>	<i>Disallow</i>
00202.024 (COES)	<i>Oppose</i>	<i>Concerned about the practical ability to 'restore'.</i>	<i>Disallow</i>

00202.025 (COES)	<i>Oppose</i>	<i>FMU Vision provide relevant timeframes. Not necessary in this provision</i>	<i>Disallow</i>
00230.087 (F+B) 00231.055 (F+G)	<i>Oppose</i>	<i>Proposed amendment is unclear and unnecessary</i>	<i>Disallow</i>
00231.055 (F+G)	<i>Oppose</i>	<i>Inconsistent with OWRUG relief seeking a transition</i>	<i>Disallow</i>
00407.038 (GP)	<i>Oppose</i>	<i>Suggested amendment is not consistent with the NPSFM</i>	<i>Disallow</i>
00509.075, 00509.080, 00509.082, 00509.088, 00509.089 (Wise)	<i>Neutral/Oppose</i>	<i>Intention of submission is generally supported, relief sought introduces matters that are unclear and uncertain</i>	<i>Disallow</i>
00230.090 (F+B)	<i>Oppose</i>	<i>Deletion ignores practical realities in some locations</i>	<i>Disallow</i>
00231.057 (F+G) 00231.056 00231.058	<i>Oppose</i>	<i>Further incursion of Trout and Salmon should not be provided for in wetlands, submission seeks to elevate habitat of trout and salmon in a way that is inconsistent with the Act</i>	<i>Disallow</i>
00237.036 (B+L) 00239.086	<i>Support</i>	<i>Agree that changes appropriate to better align with Higher order obligations</i>	<i>Allow</i>
00407.041 (GP)	<i>Oppose</i>	<i>Proposed changes are not appropriate for a Regional Policy statement and likely to lead to unintended consequences</i>	<i>Disallow</i>
00237.038 (B+L)	<i>Support</i>	<i>Support need to a quantification of effects to be avoided</i>	<i>Allow</i>
00411.045 (Wayfare)	<i>Support</i>	<i>Support use of range of effects management tools</i>	<i>Allow</i>
00101.039 (LINZ)	<i>Oppose</i>	<i>Proposed amendment creates an insurmountable threshold for wide range of activities. Would prevent needs of communities being provided for</i>	<i>Disallow</i>
00202.027, 00202.028 (COES)	<i>Oppose</i>	<i>Proposed amendment is inconsistent with the Act</i>	<i>Disallow</i>

00231.059, 00231.081, 00231.082 (F+G) 00230.093 (F+B)	<i>Oppose</i>	<i>Relief is inconsistent between parties, OWRUG seeks retention of promotion. And opposes requirement for 'habitat' as opposed to 'indigenous habitat' to be created as this seeks to elevate trout habitat in a way inconsistent with the Act. Also consider 'restore' threshold in appropriate.</i>	<i>Disallow</i>
00226.191 (KTKO)	<i>Neutral/Oppose</i>	<i>Ensure that 'achieving of the FMU visions' occurs with an appropriate transition timeframe where significant changes will be required by land and water users. Unclear what 'response' is anticipated with respect to mixing of water between catchments</i>	<i>Allow, subject to clarification</i>
00231.06 (F+G)	<i>Oppose</i>	<i>Unclear what 'restoration' seeks to achieve or the intention of proposed clause 5(e)</i>	<i>Disallow</i>
00403.006, 00404.006 McArthur and Strath Clyde	<i>Oppose</i>	<i>Relief may undermine the potential for a carefully managed transition</i>	<i>Disallow</i>
00502.007 (AWA)	<i>Oppose</i>	<i>Creation of rules to manage competing activities have potentially widespread implications that need to be carefully assessed to ensure significant adverse effects on the needs of communities are addressed</i>	<i>Disallow</i>
00226.197 (KTKO)	<i>Oppose</i>	<i>Suggested deletion is considered to reduce the usefulness of the provision</i>	<i>Disallow</i>
00101.022 (LINZ) 00136.008 (MfE)	<i>Neutral Oppose</i>	<i>Not clear exactly what the intended outcome of relief sought is, but may affect OWRUG interests</i>	<i>Disallow, subject to clarification</i>

00137.076 (DoC)	<i>Oppose</i>	<i>Proposed amendments are overly general and may therefore have wide range implications</i>	<i>Disallow, subject to clarification</i>
00226.201 (KTKO) 00231.063 (F+G)	<i>Neutral/Oppose</i>	<i>Consider proposed amendment is unnecessary given the direction in the IM chapter about relevance of provisions of RPS</i>	<i>Disallow</i>
00236.070 (Hort NZ)	<i>Support</i>	<i>Agree with proposed relief</i>	<i>Allow</i>
00101.044 (LINZ) 00138.095 (QLDC) 00213.023 (WIC)	<i>Neutral</i>	<i>Consider that factors other than LUC contribute to productive soils</i>	<i>Allow</i>
00223.096 (TAMI)	<i>Neutral</i>	<i>Proposed relief has potential to conflict with need for carefully managed transitions</i>	<i>Disallow, subject to clarification</i>
00226.205 00226.212 (KTKO)	<i>Neutral</i>	<i>Unclear what intention of suggested amendment is</i>	<i>Disallow, subject to clarification</i>
00231.064 (F+G)	<i>Neutral</i>	<i>Intention of submission generally acceptable, but introduces terms that are unclear. For example, unclear what 'habitat' is to be improved</i>	<i>Disallow, subject to clarification</i>
00202.029 (COES)	<i>Oppose</i>	<i>Unclear what intended outcome of submission is</i>	<i>Disallow</i>
00226.206 (KTKO)	<i>Neutral</i>	<i>Support intention of the submission</i>	<i>Allow, subject to clarification</i>
00239.094 (FFNZ) 00237.047 (B+L)	<i>Support</i>	<i>Agree with submission</i>	<i>Allow</i>
00202.03, 00202.031 (COES) 00230.095 (F+B) 00407.050, 00407.051 (GP) 00509.092 (Wise)	<i>Oppose</i>	<i>RPS is not appropriate place for this type of provision, this matter is better address in Land and Water Plan if necessary</i>	<i>Disallow</i>

00226.208 (KTKO) 00231.066 (F+G) 00407.049 (GP) 00509.091 (WISE)	<i>Oppose</i>	<i>Do not understand basis for requested deletions and consider they may not achieve the objectives of the NPSFM</i>	<i>Disallow</i>
00208.008 (Ag Research)	<i>Support</i>	<i>Agree with sentiment of submission</i>	<i>Allow, subject to clarification</i>
00237.049 (B+L) 00239.101, 00239.102 (FFNZ)	<i>Support</i>	<i>Agree that it would be foolhardy not to seek alignment with NPSIB</i>	<i>Allow</i>
00508.007 (Sole)	<i>Oppose</i>	<i>Unclear what this proposed amendment would cover and therefore its implications. Suggestion is inconsistent with Act</i>	<i>Disallow</i>
00231.07, 00231.075, 00231.079, 00231.069, 00231.074 (F+G)	<i>Oppose</i>	<i>Proposed amendments seek to elevate trout and salmon habitat in a way inconsistent with the Act and obligations with respect to indigenous species. Requirement for restoration is unclear, particularly given trout and salmon are introduced. Recommended provisions ignore the critical role that landowners play in achieving desired approach.</i>	<i>Disallow</i>
00137.083 (DoC)	<i>Neutral</i>	<i>Clear outcomes are useful</i>	<i>Allow, subject to clarification</i>
00226.215 (KTKO) 00230.098 (F+B) 00223.099 (TAMI)	<i>Neutral</i>	<i>Provision lacks clarity</i>	<i>Disallow, subject to clarification</i>
00239.098 (FFNZ) 00318.017 (Contact)	<i>Support</i>	<i>Agree with sentiment of the submission</i>	<i>Allow</i>
00230.104 (F+B) 00140.028 (WDC)	<i>Neutral</i>	<i>Clarity around 'lawfully established' is required</i>	<i>Disallow, subject to clarification</i>

00239.104 (FFNZ) 00139.132 (DCC) 00306.045 (Meridan) 00320.019 (Network Waitaki)	<i>Support</i>	<i>Provision is wide reaching and likely to add significant regulatory burden for little gain.</i>	<i>Allow</i>
00231.073 (F+G)	<i>Neutral</i>	<i>Support sentiment of submission as it relates to indigenous biodiversity</i>	<i>Allow, subject to clarification</i>
00230.107 (F+B)	<i>Neutral/Oppose</i>	<i>Restoration of indigenous habitat may not be attainable given degree of introduced species</i>	<i>Allow, subject to clarification</i>
00213.001, 00213.026 (WIC)	<i>Support</i>	<i>Agree that community scale irrigation schemes are regionally significant</i>	<i>Allow</i>
00239.124 (FFNZ)	<i>Support</i>	<i>Agree with need to efficient infrastructure to support communities</i>	<i>Allow</i>
00239.125 (FFNZ)	<i>Support</i>	<i>Agree with need for integration between infrastructure and land use change, consistent with OWRUG's submission regarding a carefully managed transition</i>	<i>Allow</i>
00321.058 (NZIC)	<i>Support</i>	<i>Agree with the approach set out in submission</i>	<i>Allow</i>
00139.195, 00139.198 (DCC)	<i>Support</i>	<i>Agree that clarity regarding this would assist</i>	<i>Allow</i>
00239.138, (FFNZ) 00236.087 (Hort NZ)	<i>Support</i>	<i>Agree with intent of the submission as it relates to landowners</i>	<i>Allow</i>
00239.148, 00239.203, 00239.154, 00239.149, 00239.150, 00239.151, 00239.152, 00239.153 (FFNZ) 00101.050 (LINZ) 00213.027 (WIC)	<i>Support</i>	<i>Agree with the intent of the submission</i>	<i>Allow</i>

00139.230 (DCC)			
00223.006, 00223.120, 00223.121 (TAMI) 00226.022, 00226.275, 00226.277, 00226.279 (KTKO) 00234.034 (TRONT)	<i>Neutral/Oppose</i>	<i>General intent of submission is accepted, subject to their being clarity about how overlapping 'Domains' are to be addressed Concerned that lack of identification of areas considered wahi tupuna will create difficulties for those who may be assessing activities.</i>	<i>Disallow, subject to clarification</i>
00237.059 (B+L)	<i>Support</i>	<i>Agree with the intent of the submission</i>	<i>Allow</i>
00226.278 (KTKO)	<i>Oppose</i>	<i>Consider that effects management hierarchy could be applied. Absolute avoidance required by clause (4) is inappropriate. It is unclear what is intended by proposed clause (5)</i>	<i>Disallow</i>
00302.002, 00302.003 (COWGA)	<i>Support</i>	<i>Agree with the intent of the submission</i>	<i>Allow</i>
00139.245 (DCC) 00101.059 (LINZ)	<i>Support</i>	<i>Agree with the intent of the submission</i>	<i>Allow</i>
00211.036, 00211.038, 00211.039, 00211.041, 00211.042, 00211.043, 00211.037 (LAC)	<i>Support</i>	<i>Agree with the intent of the submission</i>	<i>Allow</i>
00306.073, 00306.068, 00306.069 (Meridian)	<i>Support</i>	<i>Agree with the intent of the submission</i>	<i>Allow</i>
00223.127, 00223.129, 00223.128 (TAMI) 00234.037, 00234.036 (TRONT)	<i>Neutral/Oppose</i>	<i>Agree with general intention, but seek to ensure that approaches are appropriate to respective values.</i>	<i>Disallow, subject to clarification</i>

00239.162, 00239.163, 00239.164, 00239.166, 00239.168 (FFNZ)	<i>Support</i>	<i>Agree with the intent of the submission</i>	<i>Allow</i>
00206.063 (Trojan) 00411.077 (Wayfare)	<i>Support</i>	<i>Agree that capacity assessments need to be undertaken in consultation with wide range of stakeholders</i>	<i>Allow</i>
00318.035 (Contact)	<i>Support</i>	<i>Agree with the intent of the submission</i>	<i>Allow</i>
00411.081 (Wayfare)	<i>Support</i>	<i>Agree with the intent of the submission</i>	<i>Allow</i>
00239.172 (FFNZ)	<i>Support</i>	<i>Agree that current structure creates confusion</i>	<i>Allow</i>
00208.001 (AgR) 00237.064 (B+L)	<i>Support</i>	<i>Agree that methods need to be employed to managed relationship between Rural and urban land-use and avoid the latter constraining productive capacity</i>	<i>Allow</i>
00239.180, (FFNZ) 00236.099, 00236.106, 00236.107 (Hort NZ)	<i>Support</i>	<i>Agree that UFD provisions currently contain inadequate direction to protect productive land and productive rural activities</i>	<i>Allow</i>
00137.154, 00137.153 (DOC)	<i>Oppose</i>	<i>Proposed amendment creates a much lower threshold for avoiding affects than elsewhere in the pRPS</i>	<i>Disallow</i>
00226.310 (KTKO)	<i>Neutral/Oppose</i>	<i>Intention of proposed amendments is not entirely clear and therefore the implications are difficult to determined</i>	<i>Disallow, subject to clarification</i>
00413.005 (NZCC)	<i>Neutral</i>	<i>Generally, support the intention of the relief sought with refinement.</i>	<i>Allow, subject to clarification</i>
00206.069, 00206.072, 00206.074 (Trojan) 00411.084, 00411.135, 00411.136 (Wayfare)	<i>Neutral/Oppose</i>	<i>Generally, support intention, but require clarification on what is intended by ‘non-urban’, as it has the potential to undermine the purpose of the provision</i>	<i>Disallow, subject to clarification</i>

00414.004, 00414.005, 00414.006 (Infinity) 00413.006, 00413.007, 00413.008 (NZCC)	<i>Oppose</i>	<i>Concerned that proposed amendment undermines intention to protect highly productive land and avoid reverse sensitivity effects</i>	<i>Disallow, subject to clarification</i>
00239.184, 00239.185, 00239.186, 00239.187 (FFNZ) 00311.062 (Transpower) 00318.022 (Contact)	<i>Support</i>	<i>Agree with the intent of the submission</i>	<i>Allow</i>
00231.092 (F+G)	<i>Oppose</i>	<i>Unclear what relief and therefore the intended outcome</i>	<i>Disallow</i>
00230.146 (F+B)	<i>Oppose</i>	<i>Nature of relief sought to restrict activities in appropriate for an appendix directed at identifying outstanding waterbodies</i>	<i>Disallow</i>
00226.326 (KTKO) 00223.133, 00223.136 (TAMI)	<i>Neutral/Oppose</i>	<i>The implications of the proposed amendment are not fully understood and may undermine the operation of the relevant provisions.</i>	<i>Disallow, subject to clarification</i>
00231.093 (F+G)	<i>Oppose</i>	<i>Amendment seeks to elevate habitat of trout and salmon in a manner inconsistent with the Act</i>	<i>Disallow</i>
00231.095 (F+G)	<i>Oppose</i>	<i>Amendment creates potentially for unhelpful duplication with outstanding waterbodies section</i>	<i>Disallow</i>

