

**From:** [Sharon Aitchison](#)  
**To:** [RPS](#)  
**Cc:** [Claire Hunter](#); [Adrian Low](#); [Alison Undorf-Lay](#)  
**Subject:** PORPS Further Submission - Sanford Ltd  
**Date:** Friday, 12 November 2021 4:24:41 p.m.  
**Attachments:** [ATT00001.gif](#)  
[Sanford Ltd - Further Submission on PORPS 12 11 21.pdf](#)

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Attention: ORC Policy Team

Please find attached a Further Submission by **Sanford Ltd** with respect to the Proposed Otago Regional Policy Statement 2021. We undertake to serve copies of this further submission on the relevant submitters within 5 working days.

Please acknowledge receipt in due course.

Regards

Sharon (on behalf of Claire Hunter/Adrian Low and Alison Undorf-Lay)



**Sharon Aitchison**  
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FORM 6

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO,  
SUBMISSION ON NOTIFIED PROPOSED POLICY STATEMENT  
OR PLAN, CHANGE OR VARIATION**

Clause 8 of Schedule 1, Resource Management Act 1991

To Otago Regional Council  
Private Bag 1954  
DUNEDIN 9054

Email: [rps@orc.govt.nz](mailto:rps@orc.govt.nz)

Name **Sanford Ltd**

**1. Further submitter details**

Name of further submitter: Sanford Ltd ("**Sanford**")

Sanford made a submission on the Proposed Otago Regional Policy Statement ("**PORPS**"), being submission number 0122.

**2. Only certain people can make a further submission**

Sanford has an interest in the PORPS that is greater than the interest that the general public has on the following grounds:

- a) Sanford is a long-standing participant in the New Zealand seafood industry and is New Zealand's only publicly listed seafood company.
- b) Its operations include catching / farming marine species, contracting, farm services (e.g. float making), processing, packaging and exporting seafood products. Sanford has well-established markets domestically and internationally, and strives to develop and promote New Zealand seafood products at every opportunity.
- c) Sanford has lodged resource consent applications for two new marine farm developments within the Otago region. This is referred to as "Project East".
- d) Sanford has significant existing and ongoing investment in the Otago / Southland region. It has its main hatchery in Kaitangata, south of Dunedin, supporting hatcheries

in North Canterbury and North Otago. Sanford will need to expand its hatchery and processing facilities in the lower South Island to support both its existing Stewart Island farm and its two new offshore marine farms in the area.

**3. Hearing options**

Sanford does wish to be heard in support of its further submission.

If others are making a similar submission, Sanford would consider presenting a joint case with them at the Hearing.

**Signature:**

**Sanford Ltd**



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Alison Undorf-Lay, Industry Liaison Manager,  
Sanford Limited.

**Date:**

12 November 2021

**Electronic address for service:** AUndorf-Lay@sanford.co.nz

**Postal Address for Service:** Sanford Limited  
PO Box 443  
Shortland Street  
Auckland 1140

**Contact person:** Alison Undorf-Lay

**Telephone:** 027 7293 7795

**Email:** AUndorf-Lay@sanford.co.nz

Submitter	Submission Point	Specific provision	Position on submission point	Reasons for support or opposition	Decision sought from Council
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.045	General Submission "Effects Management Hierarchy"	Oppose	Sanford considers that in some instances it may be appropriate to retain access to an ability to use the "effects management hierarchy" in a coastal context.	Reject
Port of Otago Ltd	00301.058	General Submission Format	Support	Sanford supports an approach whereby it is clear throughout the ORPS which provisions apply to the coastal environment, and which clearly do not.	Accept
Waka Kotahi NZ Transport Agency	00305.001	Definition - 'Functional need'	Support	Sanford agrees that the definition of this term in accordance with the National Planning Standards 2019 is appropriate and supports the relief sought.	Accept
Waka Kotahi NZ Transport Agency	00305.004	Definition - 'Operational need'	Support	Sanford agrees that the definition of this term in accordance with the National Planning Standards 2019 is appropriate and supports the relief sought.	Accept
Port Otago Ltd	00301.003	Definition – 'Highly valued natural features and landscapes'	Support	Sanford agrees that there is ambiguity as to what type of area / landscape would comprise a 'highly valued natural feature or landscape' and this needs greater clarity throughout the ORPS.  Alternatively reference to this could be deleted throughout the ORPS.	Accept
Meridian Energy Limited	00306.003	Definition – 'Highly valued natural features and landscapes'	Support	Sanford agrees that there is ambiguity as to what type of area / landscape would comprise a 'highly valued natural feature or landscape' in Otago, and an appropriate response would be to delete reference to this term throughout the ORPS.	Accept
Meridian Energy Limited	00306.007	Definition – 'Residual Risk'	Support	Sanford agrees that there is uncertainty with regard to this term, and would support its deletion, or further clarification as follows:  <i>"means the risk remaining after the implementation of undertaking of all available and practicable risk management measures"</i> .	Accept
Director General of Conservation	00137.016	Definition – 'Significant Natural Area'	Oppose	As per its original submission, Sanford seeks the retention of this definition as notified.	Reject
Port of Otago Ltd.	00301.015	IM – P15	Support	Sanford supports the amendments being proposed by the submitter to this policy. Adopting a precautionary approach, which allows for an adaptive management approach is appropriate.	Accept
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.046	CE – O1	Oppose	Sanford opposes the removal of the words "representative or significant areas of" from clause (4), as this makes the requirement of protection too broad.	Reject
Ravensdown Limited	00121.039	CE – O2	Support	Sanford agrees that it is appropriate to remove reference to "highly valued areas" of the coastal environment. This term is not clear and should be removed throughout the entirety of the ORPS.	Accept

Submitter	Submission Point	Specific provision	Position on submission point	Reasons for support or opposition	Decision sought from Council
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.051	CE – P1	Oppose	Sanford seeks to ensure that the Coastal Chapter of the ORPS is retained as a standalone chapter. There are provisions within the Coastal Chapter which address coastal ecosystems and biodiversity. Activities in the coastal environment do not need to also be subject to the provisions in the ECO Chapter.	Reject
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.052	CE – P2	Oppose	The amendments being sought by the submitter appear to be a duplication of the matters which are already generally provided for within this policy (or others in this chapter) and are not needed.	Reject
Z Energy Limited, BP Oil NZ Limited, Mobil Oil NZ Limited	00510.014	CE – P3	Support	Sanford supports the correction to CE-P2(2) and otherwise the retention of CE-P3 as notified.	Accept
Dunedin City Council	00139.065	CE – P4	Support	Sanford acknowledges the submitters concerns with the general use of the term “avoid” throughout the ORPS. Sanford agrees that it would be prudent to ensure it is a necessary requirement before its application in policies in the ORPS.	Accept
Harbour Fish, Southern Fantastic and Fantastic Holdings	00126.021	CE – P4	Oppose in part	Sanford considers it appropriate that this policy seeks to identify areas of high and outstanding natural character within the coastal environment. It is not clear how the removal of these terms would improve the application of this policy.	Reject
Meridian Energy Limited	00306.030	CE – P6	Support	Sanford generally supports the amendments being sought by the submitter as they align with section 6 of the RMA, in particular the amendments to clause (2).	Accept
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.057	CE – P7	Oppose	Sanford opposes the amendments to this policy as it potentially broadens the application of it to all surf breaks, regardless of their regional or national significance.	Reject
Wise Response Society Inc	00509.066	CE – P11	Oppose	This is an enabling provision and consideration of the impacts of the activity are provided for by other provisions of the chapter.	Reject
Port of Otago Ltd.	00301.025	CE – M2	Support	Sanford agrees that it might be premature to identify “likely” areas until such time as a robust review process and mapping exercise has been undertaken.	Accept
Waka Kotahi NZ Transport Agency	00305.019	CE – AER2	Support	Sanford considers the amendments being proposed by the submitter to be appropriate, and better balance the outcome required by CE-AER2. Sanford submits however that this outcome could be broadened as follows:  <i>“There is no reduction in the extent of identified areas of high and outstanding natural character in the coastal environment, while recognising the functional and operational needs of certain activities that need to locate in the coastal environment.”</i>	Accept
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.106	ECO – P7	Oppose	Sanford considers it appropriate that the ECO Chapter provisions defer to the provisions which are contained within the Coastal Chapter, however it is not considered appropriate to require the absolute “protection” of all indigenous biodiversity within the coastal	Reject in part

Submitter	Submission Point	Specific provision	Position on submission point	Reasons for support or opposition	Decision sought from Council
				environment as may be inferred by the amendments that are being sought to this provision by the submitter. Sanford seeks the retention of the term “managed”.	
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.111	ECO – M2	Oppose	Sanford opposes the inclusion of the coastal environment within this method.	Reject
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.135	HAZ – NH – O1	Oppose in part	The implications of broadening this policy to apply to natural hazard risk on ecosystem health and indigenous biodiversity have not been properly quantified. This is not considered to be appropriate.	Reject
Royal Forest and Bird Protection Society of New Zealand Incorporated	00230.135	HAZ – NH – P1	Oppose in part	The implications of broadening this policy to apply to natural hazard risk on ecosystem health and indigenous biodiversity have not been properly quantified. This is not considered to be appropriate.	Reject
Dunedin City Council	00139.198	HAZ – NH – P5	Support	Sanford agrees that it would be appropriate to clarify what is meant by the application of the “precautionary approach” in this policy.	Accept
Mt Cardrona Station	00014.058	HAZ – NH – P5	Support	Sanford agrees a balanced approach to considering risks from natural hazards over the lifetime of the development under consideration is appropriate. This should also take into account all mitigation measures are applicable when determining any risk assessment.	Accept
Trojan Holdings Limited (Trojan)	00206.075 00206.076	APP6 – Methodology for natural hazard risk assessment	Support in part	Sanford seeks to ensure the methodology for natural hazard risk assessment is consistent with best practice and is robust. Sanford also seeks to ensure that the methodology is applicable across all environments.	Accept in part (ensure methodology is robust and consistent with best practice for hazard risk identification and assessment).
Wayfare Group Ltd	00411.090 - 00411.095	APP6 – Methodology for natural hazard risk assessment	Support in part	Sanford seeks to ensure the methodology for natural hazard risk assessment is consistent with best practice and is robust. Sanford also seeks to ensure that the methodology is applicable across all environments.	Accept in part (ensure methodology is robust and consistent with best practice for hazard risk identification and assessment).