

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

Sustainable Tarras Incorporated Society

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

3. I am (*tick whichever applies and add grounds if required*):

<input checked="" type="checkbox"/>	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
<input type="checkbox"/>	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:	Sustainable Tarras represents the views of the majority of the Tarras community as surveyed about the proposed development of an international airport in August/September 2021. Our community survey to which 41% of all households within 10 km of the proposed airport replied shows 83% of residents are against the proposed airport development at Tarras by Christchurch Airport (13% support, 4% neutral; margin of error +/- 8%). Reported as public interest by several media incl. ODT - https://www.odt.co.nz/regions/central-otago/opposition-airport-clear-survey . The survey is currently being extended to include residents beyond 10km. Preliminary results show similar opposition to the Tarras airport proposal across the wider Clutha valley.

	<p>Sustainable Tarras totally rejects the assertions in Appendix A that the provision of domestic and international connectivity as a driver of social and economic prosperity cannot be maximised for the region due to capacity constraints at Queenstown within the next 10 years.</p> <p>The inference that Tarras is a low-density population area and therefore optimal for another internationally capable jet airport is incorrect. Populations in the area have doubled for each of the last 3 NZ census 2006-2018. Multiple housing subdivisions have been approved in 2021, with a proposed subdivision for 17 families currently seeking approval. This should reflect a further doubling from 2018 to the 2023 census.</p> <p>The assertion that a Tarras airport will support future low emission aviation requirements (and the inference that Queenstown airport won't and may need to be relocated or substituted) ignores the minimal impact of these new technologies especially over the next 15 years, but more importantly the major increase in absolute emissions from both a new airport build as well as a large increase in flight demand and resultant emissions that a new airport will create. There is no supply of steel, aluminium or concrete available without heavy and direct use of coal in production and diesel in transportation to what is a remote part of New Zealand. A large increase in flight numbers runs totally opposed to the commissioner of the environment's recent reports calling on a review of tourism numbers and their negative impacts on the environment.</p> <p>If the submitted changes are accepted into the RPS they will create more favourable conditions for a future development application permanently harming the natural environment which the local Tarras community is overwhelmingly against.</p>
	<p>the local authority for the relevant area</p>

4. I ~~wish/do not wish~~ (Select one) to be heard in support of my further submission.
5. If others make a similar submission, I ~~will/will not~~ (Select one) 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).

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

Name Chris Goddard

Position Chairperson

Organisation Sustainable Tarras Incorporated Society

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)*

Chris Goddard – Chair Sustainable Tarras Incorporated Society

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

Chris.goddard@blackswannz.com

f. Telephone:

0211982477

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

Dr Marilyn Duxson, 413 Maori Point Road, Tarras, 9347, New Zealand

7. My further submission is:

I ~~support~~/oppose the submission of:

<p>Christchurch International Airport Limited c/- Amy Hill Chapman Tripp Level 5, PwC Centre</p> <p>60 Cashel Street PO Box 2510 Christchurch 8140</p> <p>Submission ID 307</p>

NOTE: Please use a new further submission form for each different original submission you support/oppose

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].
14 ECO-P6 – Maintaining indigenous biodiversity	Oppose	Removes or substantively reduces protection for Bendigo Wetlands and Mata-Au/Clutha River. The Bendigo wetlands are located approximately 6-10km from the proposed airport and well within the Civil Airport Authority recommended a 13km bird strike management zone. Airport safety standards require reductions and/or removal of native bird life via various techniques including culling, removal of food sources including native	Disallow in part – deletion of section 5(b)

		<p>plant life, restrictions on farming, water ponding and grass seed choices.</p> <p>These actions will permanently change the local area, impact bird, insect and plant life indigenous only to Central Otago.</p> <p>A reasonable person would say these impacts are not less than minor or de minimis.</p> <p>The perilous nature of New Zealand's indigenous biodiversity and the urgent need with which the effects management hierarchy needs to be strengthened.</p> <p>The ORC has adopted the hierarchy as is expressed by Te Mana o te Wai in the National Policy Statement for Freshwater Management (2020), and which is being considered as part of the Natural and Built Environments Bill.</p>	
<p>20</p> <p>EIT-INF-P13 – Locating and managing effects of infrastructure</p>	<p>Oppose</p>	<p>Removes or substantively reduces protection currently available to the Tarras community and surrounding environment.</p> <p>The broader Tarras environment is one of outstanding natural beauty and includes significant natural areas, outstanding natural features and landscapes, natural wetlands, etc. We support ORC's consistent application of 'avoid' as the first priority.</p> <p>Locating infrastructure such as an international airport on a 750 ha campus</p>	<p>Disallow whole</p>

		<p>in Tarras does not serve the Tarras community or surrounding Central Otago district. Questions from the community on any direct or indirect benefits to Tarras and surrounding district remain unanswered over a 15-month period.</p> <p>The lower South Island would have ~7% of the population but 50% of the international capable airports, with significant spare capacity reported into the future for the existing 4 available airports (Queenstown, Dunedin, Invercargill, Christchurch).</p>	
<p>12</p> <p>IM-P14 – Human impact</p>	<p>Oppose</p>	<p>With less than 13% of the local Tarras community supporting the Christchurch airport proposal, asking to set aside the community view and trade this view off against unknown tangible or intangible public benefits feels inappropriate.</p> <p>Selectively trading off human impacts from functional or operational needs (from building and operating an international airport) against the environment creates an unnecessary discussion of where the boundaries are or should be drawn and risk of unnecessary conflict between communities around who gains or loses.</p> <p>Imposing functional or operational restrictions (which to date have not been released) on a local community for public benefit can ultimately be used as justification to remove or minimise</p>	<p>Disallow in part – addition of item 3</p>

		compensation to these communities for these restrictions.	
6 IM-P2-Decision priorities	Oppose	<p>The Tarras community values its natural environment over and above currently proposed economic benefits provided by an international airport in the community.</p> <p>From a survey August/September 2021, 83% of Tarras community values preserving the natural environment over and above the benefits proposed with the Tarras international airport.</p> <p>Proposing that economic benefits have equal priority to securing long term life-supporting capacity and mauri of the natural environment may create unnecessary conflicts between communities who do not evenly share or gain any of the benefits or may have much of the negative impact.</p> <p>It also silences the voices of future generations by trading off present day economic gain for the long-term sustainability of the environment.</p> <p>‘Balance these goals’ perpetuates the ill-informed approach to management of the natural environment which has delivered the climate crisis and biodiversity crisis we are currently experiencing.</p>	Disallow in part – the deletion of the words “firstly”, ‘secondly”, “thirdly”.
<p>Note: Additional rows for each separate further submission point should be added as required.</p>			

RPS

From: Chris Goddard <chris.goddard@blackswanNZ.com>
Sent: Friday, 12 November 2021 1:47 p.m.
To: RPS
Cc: Amy.Hill@chapmantripp.com
Subject: PORPS Further Submission
Attachments: 211112 - Sustainable Tarras - form-6-written-further-submissions-form-on-proposed-otago-rps-2021.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: FSNew, Further Submission

Please find a submission with copy to the person who made the original submission to which this submission relates.

Best regards,

Chris Goddard
Chair - Sustainable Tarras

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