



FORM 6

Clause 8 of the First Schedule of the Resource Management Act 1991

FURTHER SUBMISSION ON PROPOSED OTAGO REGIONAL POLICY STATEMENT

Date: 12 November 2021

To: Otago Regional Council
70 Stafford St
Dunedin
Submission lodged by email: RPS@orc.govt.nz

Name of person making submission: Te Rūnanga o Ngāi Tahu (Submitter Number 00234 (your reference)).

These are further submissions in support or opposition to submissions on: the Proposed Otago Regional Policy Statement

Te Rūnanga o Ngāi Tahu **could not** gain an advantage in trade competition through this submission.

Te Rūnanga o Ngāi Tahu is entitled to make further submissions because:

- (I) It is a submitter on the Otago RPS; and
- (II) as the iwi authority has an interest in the proposed Otago RPS which is greater than the general public.

We **do** wish to be heard in support of its submission

If others make a similar submission, Te Rūnanga o Ngāi Tahu **will** consider presenting a joint case with them at a hearing

1. Introduction and Position

1.1 These further submissions are made on behalf of Te Rūnanga o Ngāi Tahu (**Te Rūnanga**) which is the statutorily recognised representative tribal body of Ngāi Tahu whānui (as provided by section 15 of the Te Rūnanga o Ngāi Tahu Act 1996 (TRONT Act)) and was established as a body corporate on 24 April 1996 under section 6 of the TRONT Act.

1.2 Section 3 of the TRONT Act states:

“This Act binds the Crown and every person (including any body politic or corporate) whose rights are affected by any provision of this Act”

1.3 Section 15(1) of the TRONT Act states:

“Te Rūnanga o Ngāi Tahu shall be recognised for all purposes as the representative of Ngāi Tahu Whānui.”

1.4 Notwithstanding its statutory status as the representative voice of Ngāi Tahu whānui “for all purposes”, Te Rūnanga accepts and respects the right of individuals and Papatipu Rūnanga to make their own responses.

1.5 Papatipu Rūnanga who have shared interests across the Otago Region are: Waihōpai Rūnanga; Te Rūnanga o Awarua; Te Rūnanga o Ōraka Aparima and Te Rūnanga o Hokonui (collectively referred to as Ngāi Tahu ki Murihiku) and Te Rūnaka o Ōtākou, Kati Huirapa ki Puketeraki Rūnaka and Moeraki Rūnaka (collectively referred to as Kāi Tahu ki Ōtākou).

1.6 Te Rūnanga makes further submissions shown in Schedule One on the submission that have been made on the Proposed Otago Regional Policy Statement.

1.7 Te Rūnanga o Ngāi Tahu supports the submissions of Kāi Tahu ki Otago/Aukaha submission number Submitter number 00226. Submissions are also set out and supported in Schedule One. The submissions of Kāi Tahu ki Otago/Aukaha will achieve Part II of the RMA, particularly sections 5, 6(e), 7(a) and 8.

1.8 Te Rūnanga o Ngāi Tahu supports the submissions of Te Ao Marama Inc Submitter number 00223. Submissions are also set out and supported in Schedule One. The submissions of Te Ao Marama achieve Part II of the RMA, particularly sections 5, 6(e), 7(a) and 8.

We support or oppose the submissions as set out in Schedule One.

The reasons for our support or opposition are also set out in Schedule One.

Copies of these further submissions will be served on each submitter within five working days.

Please note that due to the size of Schedule One this has been split into four parts:

Part 1: General, Introduction and General Provisions, Interpretation, National Direction Instruments, Mana Whenua, Resource Management Overview, Resource Management Issues of Significance to Iwi, Integrated Management, Air and Coastal Environment,

Part 2: Land and Freshwater

Part 3: Ecosystems and Indigenous Biodiversity, Energy and Infrastructure, Hazards and Risks, Historical and Cultural Values

Part 4: Natural Features and Landscapes, Urban Form and Development, Evaluation and Monitoring, Appendices and Maps



**Signature of person (s) making further submission
(or person authorised to sign on behalf of person (s) making further submission)**

Dr Lynda Murchison
Programme Leader - Mauri

For Trudy Heath
General Manager, Te Ao Tūroa

Address for Service:

Tanya Stevens
Senior Environmental Advisor
Te Rūnanga o Ngāi Tahu
Email: Tanya.Stevens@ngaitahu.iwi.nz
Phone: 021 708 510

Te Rūnanga o Ngāi Tahu Further Submission: Schedule One

Part 1: General, Introduction and General Provisions, Interpretation, National Direction Instruments, Mana Whenua, Resource Management Overview, Resource Management Issues of Significance to Iwi, Integrated Management, Air, and Coastal Environment

I support/oppose the submission of:	Original submission on point number	Support OR Oppose	Relief sought	The reasons for my support/opposition are:	I seek that the whole (or part) of the submission be allowed (or disallowed):
General					
00226 Kāi Tahu ki Otako / Aukaha	00226.006	Amend	GEN – General Submission Amend to integrate climate change provisions across the entire PORPS in order to provide clearer and stronger direction.	Te Rūnanga o Ngāi Tahu agrees climate change provisions need to provide stronger direction.	Allowed
00226 Kāi Tahu ki Otako / Aukaha	00226.001	Support	GEN – General Submission Retain the recognition of the mana and rakatirataka of Kāi Tahu, and their status as partners under Te Tiriti o Waitangi.	Kāi Tahu ki Otago are rakatira and Treaty partners.	Allow
00226 Kāi Tahu ki Otako / Aukaha	00226.004	Support	GEN – General Submission Retain references to the relationship with Kāi Tahu in the context of partnership.	Kāi Tahu ki Otago are rakatira and Treaty partners.	Allow
00226 Kāi Tahu ki Otako / Aukaha	00226.002	Amend	GEN – General Submission Amend throughout to better define mana whenua values (including concepts such as mana, whakapapa, mauri, rakatirataka, kaitiakitaka, and mātauraka) from the perspective of mana whenua.	Kāi Tahu concepts need to be articulated from a Kāi Tahu perspective.	Allow

00226 Kāi Tahu ki Otako / Aukaha	00226.003	Amend	<p>GEN – General Submission</p> <p>Amend throughout to specify Kāi Tahu preference for deep engagement in resource management processes by referencing “resource management processes and decision – making” when referring to the role of mana whenua in resource management.</p>	As Treaty Partners it is appropriate for Kāi Tahu to be partners in resource management planning and decisions.	Allow
00226 Kāi Tahu ki Otako / Aukaha	00226.329	Amend	<p>GEN – General Submission</p> <p>Amend by including a map of Native Reserves and cross-referencing this from the Mana Whenua chapter</p>	Cross referencing is a useful tool.	Allow
00223 Te Ao Marama	00223.003	Amend	<p>GEN – General Submission</p> <p>Ensure that provisions provide clear guidance about how to achieve objectives, including those relevant to Kāi Tahu in the Mana Whenua chapter and Integrated Management chapter, in situations where mapping is intended but has not yet occurred and when targets or limits are required but have not yet been set.</p>	Clear guidance will assist in the delivery of the policy statement.	Allow
00412 Ernslaw One	00412.017	Oppose in part	<p>GEN – General Submission</p> <p>Ernslaw submits that ORPS 2021 be deleted and that a new RPS be drafted to prioritise regional policy needed to give effect to the NPSFM 2020 and the NESF 2020.</p>	Te Rūnanga considers that the Proposed RPS should be retained, but agree some amendments are desirable.	Disallow
00412 Ernslaw One	00412.010	Oppose	<p>GEN – General Submission</p> <p>Any restriction on harvesting activities over and above the NESPF would have to be justified by evidence and pass a rigorous cost-benefit analysis before being worked through with the industry and</p>	The NESPF is primarily focussed on effects of sediment, slash, or woody material on waterways. It is also a key mechanism by which wilding pine risk is	Disallow

			<p>MPI / Te Uru Rākau, given the significant impact such changes would have on the wider market and economic base, communities and the work force, forestry assets and the NZ's climate change policy, to avoid the creation of stranded assets.</p>	<p>managed. There is some control on other effects (e.g. landscapes, nesting birds, fish passage, boundary effects, but these matters will normally be addressed in other planning instruments (Regional and District Plans and other National Policy Statements or National Environmental Standards).</p> <p>Also, Carbon Forestry is not controlled by the NESPF because it falls outside the definition of 'Production Forest'.</p>	
00412 Ernslaw One	00412.001	Oppose in part	<p>GEN – General Submission</p> <p>Delete RPS in its entirety and replace with a freshwater focused RPS to prioritise the changes necessary to give effect to NPSFM 2020 and NESF 2020. Any provisions that do not address freshwater specifically, should be redrafted into a future RPS document given likely change in national direction and RMA Reform.</p>	<p>Te Rūnanga considers that the Proposed RPS should be retained, but agree some amendments are desirable.</p>	Disallow
00239 Federated Farmers of New Zealand	00239.194	Oppose	<p>GEN – General Submission</p> <p>Federated Farmers of NZ Inc submit that the application of Te Mana o Te Wai hierarchical approach across all chapters of the RPS is going beyond the intent of the NPSFM 2020.</p>	<p>Wai maori is the foundation of life and Te Ao Tūroa (the environment). It is appropriate in an RPS – whose purpose is to achieve the purpose of the RMA by , among other matters,</p>	Disallow

				providing for the integrated management of the natural and physical resources of the Region, to weave fundamental resource management concepts associated with wai māori throughout the document. Consistency across the plan in terms of the management of resources will assist in the successful implementation of the plan.	
00033 Port Blakely NZ Ltd	00033.0 05	Support in part	<p>GEN – General Submission</p> <p>Amend the RPS21 to recognise that forestry provides a long – term net – positive eco – system service, including the sequestration of carbon and that afforestation will bring multiple eco – system services and benefits, if managed correctly.</p>	Te Rūnanga o Ngāi Tahu agrees there is significant potential for beneficial ecosystem services alongside some forestry enterprises, though these are much more limited in monocultural pine plantations than mixed forests.	Allow in part
00419 Terry Wilson	00419.0 03	Oppose	<p>GEN – General Submission</p> <p>That references to “Treaty Partnership” are fraudulent and should be removed.</p>	Section 8 of the RMA requires that principles of the Treaty of Waitangi are taken into account. A key principle of the Treaty of Waitangi is partnership. References to Treaty Partnership are	Disallow

				therefore appropriate within a Regional Policy Statement.	
New Provisions					
00018 Darryl Sycamore	00018.003	Oppose	<p>New Provision</p> <p>The submitter seeks a new Policy X.X.2 To recognise the functional needs of mineral exploration, extraction and processing activities to locate where the resource exists.</p>	This policy could be interpreted to read that wherever minerals resource exists, that related activities should be allowed to occur as of right and without qualifiers.	Disallow
00018 Darryl Sycamore	00018.004	Oppose in part	<p>New Provision</p> <p>A New policy is sought which manages adverse effects of mineral extraction, exploration and processing by giving preference to locations that are outside of areas managed by section 6.</p>	The concept has merit but the new policy sought does not provide sufficient direction to recognise and provide for the matters listed in the submission. In addition, Ngāi Tahu cultural values are not listed and therefore would not be recognised and provided for.	Disallow
<p>00006 Duncan, Brent & Kelly</p> <p>(Template submission – One of a number of identical submissions)</p>	00006.001	Oppose in part	<p>New Provision</p> <p>Amend RPS21 to include the following Objective: <u>Objective X.X Sufficient land is managed and protected for economic production.</u></p>	The concept needs to be considered as part of achieving the purpose of the RMA but the policy proposed is too unclear as to what is meant by 'sufficient land' and 'economic production' and needs to be tied to the other values associated with land and soil, including those values that ensure it is an intergenerational resource for	Disallow

				mahika kai/economic production.	
00006 Duncan, Brent & Kelly (Template submission – One of a number of identical submissions)	00006.002	Oppose in part	New Provision Amend RPS21 to include the following Policy: <u>Policy X.X.1</u> <u>Manage activities in rural areas and support the region's economy and communities, by:</u> <u>a) Enabling primary production and other rural activities that support that production;</u> <u>b) Providing for mineral exploration, extraction and processing;</u>	The concept needs to be considered as part of achieving the purpose of the RMA but the policy needs to be link in other values associated with land and soil, Land (whenua) has a immense spiritual value to Kai Tahu – it is the origins of whakapapa and identity as well as mahika kai. Ngāi Tahu cultural values associated with the health of the whenua need to be considered too.	Disallow
00006 Duncan, Brent & Kelly (Template submission – One of a number of identical submissions)	00006.003	Oppose in part	New Provision Amend RPS21 to include the following Policy: <u>Policy X.X.2</u> <u>To recognise the functional needs of mineral exploration, extraction and processing activities to locate where the resource exists.</u>	The concept is important, but the proposed new policy could be interpreted to read that wherever minerals resource exists, that related activities should be allowed to occur as of right and without qualifiers.	Disallow
00006 Duncan, Brent & Kelly (Template submission – One of a number of identical submissions)	00006.004	Support in part	New Provision Amend RPS21 to include the following Policy: <u>Policy X.X.3</u> <u>Manage adverse effects from the exploration, extraction and processing of minerals, by:</u>	The concept has merit but needs refinement to achieve the purpose of the RMA and to give effect to higher order documents. In particular, consideration needs to be given to s6(a) and (e) matters, the NPSFM 2020 and to recognise that in	Allow jn part

			<p><u>a) Giving preference to avoiding their location in the following:</u></p> <p><u>i. Areas of significant indigenous vegetation and significant habitats of indigenous fauna in the coastal environment;</u></p> <p><u>iii. Outstanding natural features and natural landscapes, including seascapes, in the coastal environment</u></p> <p><u>v. Areas of significant indigenous vegetation and significant habitats of indigenous fauna beyond the coastal environment;</u></p> <p><u>v. Outstanding natural character in areas beyond the coastal environment;</u></p> <p><u>vi. Outstanding natural features and landscapes beyond the coastal environment;</u></p> <p><u>vii. Outstanding water bodies or wetlands;</u></p> <p><u>viii. Places or areas containing historic heritage of regional or national significance where the effects on that historic heritage cannot be avoided;</u></p> <p><u>b) Where it is not practicable to avoid locating in the areas listed in a) above due to the functional needs of that activity, the activity shall:</u></p> <p><u>i. Avoid, remedy or mitigate, as necessary, adverse effects on values in order to maintain the outstanding or significant nature,</u></p> <p><u>ii. Consider first biological diversity offsetting, and then biological diversity compensation for residual adverse effects,</u></p>	<p>some situations effects must be avoided to give effect to the RMA and higher order documents. There is no presupposition in the RMA of the 'right' to mineral abstraction (or any other activity).</p>	
--	--	--	---	---	--

			<p>iii. <u>Consider environmental compensation if adverse effects on indigenous biological diversity, cannot practically be avoided, remedied or mitigated;</u></p> <p>iv. <u>Avoiding, remedying, or mitigating adverse effects on other values including highly valued natural features, landscapes and seascapes in order to maintain their high values;</u></p> <p>v. <u>Reducing unavoidable adverse effects by staging development for longer term activities and progressively rehabilitating the site, where possible.</u></p>		
Introduction and General Provisions					
Interpretation					
00223 Te Ao Marama	00223.021	Support	Clarify the meaning of 'Over-allocation' as it relates to the definition of 'Degraded' when a limit has not been set in an FMU or part of an FMU	Te Rūnanga o Ngāi Tahu agrees these matters need clarification.	Allow
00010 Cain whānau	00010.003	Oppose in part	<p>Definition - Papakainga</p> <p>Amend definition of Papakainga by extending the benefits to non Ngāi Tahu, including to introduce the ability for 'others as allowed by mana whenua' to subdivide and develop ancestral and tribal lands and resources to provide for themselves and others.</p>	It is not necessary to specify at a Regional Policy Statement level that whānau members who are not Ngāi Tahu will be able to live within a Papakaika. That is a matter for Papatipu Rūnaka to determine in positions on district plans.	Disallow in part
00010 Cain whānau	00010.003	Allow in part	<p>Definition – Papakaika</p> <p>Retain and amend definition of Papakāika or papakāinga as follows:</p>	It is not necessary to specify at a Regional Policy Statement level that whānau members who are not Ngāi	Allow in part

			<p>Papakāika or papakāinga means <u>subdivision</u>, use and development by mana whenua <u>or others as allowed by mana whenua</u>, of ancestral or tribal lands <u>and resources to provide for sustain themselves and others in general</u> accordance with tikanga Māori, which may include</p> <p>residential activities and non – residential activities for cultural, social, recreational, environmental or limited commercial purposes.</p>	Tahu will be able to live within a Papakaika. The addition of 'resources' and deletion of 'limited' is worth further discussion.	
00233 Fonterra Co-operative Group Ltd	00213.0 06	Oppose	New definition - regionally significant industry	The introduction of a regionally significant industry definition is potentially confusing and unclear why it is necessary to achieve the purpose of the RMA. In particular, it may be confused with nationally or regionally significant infrastructure.	Disallow
00231 Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.0 16	Oppose	<p>Definition - Natural Environment</p> <p>Amend as follows:</p> <p>Insert definition: Natural environment means:</p> <p>(a) land, water, air, soil, minerals, energy, and all forms of plants, animals and other living organisms, whether native to New Zealand or introduced, and their habitats,</p> <p>(b) ecosystems, their constituent parts and the natural processes that sustain these,</p> <p>(c) the natural landscape and landforms that are formed by the interactions between (a) and (b), and</p>	<p>The term environment is already defined in the RMA. It is a breach of the Interpretation Act 1999 to redefine terms defined in a statute in a subordinate document.</p> <p>It is not clear why a definition of Natural Environment is required and what the application would be given the term is not used in the RMA.</p>	Disallow

			<p>(d) excludes pests and domestic and farmed animals.</p> <p>Plus, consequential changes as referenced in the reasoning section.</p>		
00223 Te Ao Marama	00223.016	Amend	<p>Definition - Cross Boundary Matters</p> <p>Add the following additional sentences at the end of the paragraph: “Establishing and implementing relationship agreements such as Mana Whakahono a Rohe agreements, protocols and charters can provide a framework for the council to provide necessary support. Increasing skills and capacity within council staff and decision-makers through training in Te Tiriti o Waitangi, locally relevant Treaty Settlement mechanisms and tikanga Māori, and developing familiarity with Kāi Tahu documents, are also important means of improving takāta whenua involvement in council processes.</p>	It is useful at a regional policy level to highlight the benefits of Mana Whakahono a Rohe agreements.	Support
00226 Kāi Tahu ki Otago / Aukaha	00226.038	Amend	<p>Definition - Mahikia kai</p> <p>Add new definition as follows: <u>Mahika kai means gathering of food and natural materials by Kāi Tahu whānui in accordance with tikaka, the places where those resources are gathered, and the work, methods and cultural activities involved in obtaining them.</u></p>	<p>The definition proposed is consistent with Ngāi Tahu concepts of mahika kai and it is useful have this expressed in regional documents.</p> <p>The term mahinga kai is defined in s167 of the NTCSA 1998 for the purposes of the NTCSA. While this RPS is not an instrument of the NTCSA 1998 for the purposes of s34 of the Interpretation Act 1999, thought will need to be given to the relationship between the two.</p>	Support

00226 Kāi Tahu ki Otago / Aukaha	00226.025	Amend	Definition – aquaculture activities Amend as follows: (d) does not include an activity specified in paragraph (a) or (b) if: i. the activity is carried out solely for the purpose of monitoring the environment, <u>or the activity involves customary food culturing on structures undertaken by mana whenua for non – commercial purposes.</u>	The amendment makes the definition consistent with the NZCPS which reduces confusion.	Support
00226 Kāi Tahu ki Otago / Aukaha	00226.0 26	Support	Retain definition of Hard Protection structure as notified.	The amendment makes the definition consistent with the NZCPS which reduces confusion.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.0 28	Support	Retain definition of Kāika as notified	Definition is appropriate	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.0 29	Support	Retain definition of kaitiakitaka as notified	Consistent with the RMA	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.0 30	Support	Retain definition of mana whenua as notified	Consistent with the RMA	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.0 32	Support	Amend definition of Papakaika to include educational use	For Kāi Tahu, Papakaika include a range of uses.	Allow
00226 00226 Kāi Tahu ki Otago / Aukaha	00226.0 33	Support	Amend definition of Primary Production so that it relates to outdoor agriculture, horticulture and pastoral activities.	Agree that definition of primary production needs to match what is envisaged in the provisions in the plan. If possible, it ought to be	Allow

				consistent with conventional understandings to avoid confusion. Primary production does normally include aquaculture, forestry, and viticulture. Mining is usually dealt with separately as it is extracting an existing resource rather than producing one.	
Kāi Tahu ki Otago / Aukaha	00226.0 34	Support	Definition - Regionally Significant Infrastructure Amend definition of regionally significant infrastructure.	Agree that the definition should not include readily relocatable public transport facilities.	Allow
00140 Waitaki District Council	00140.0 02	Support	New Definition - Carbon forestry Amend to add new definition of 'carbon forestry' as follows: Carbon forestry "The practice of planting and growing trees to sequester atmospheric carbon into the soil, wood, leaves and roots."	Carbon forestry is a different issue to plantation forest. Once established, Carbon Forestry can be expected to be a permanent fixture/modification of the environment, whereas plantation forest is essentially a (long lived) crop. Furthermore, Carbon Forestry is not subject to most regulations in the NESPF.	Allow
00123 Heritage New Zealand Pouhere Taonga	00123.006	Support	Definition - Archaeological site Amend Definition [Archaeological site] as follows: Archaeological site has the same meaning as in section 6 of the Heritage New Zealand Pouhere Taonga Act 2014(as set out in the box	It is important for definitions to be consistent with other relevant legislation to prevent unintended consequences or confusion.	Allow

			<p>below) means, subject to section 42(3),–</p> <p>(a) any place in New Zealand, including any building or structure (or part of a building or structure), that–</p> <p>(i) was associated with human activity that occurred before 1900 or is the site of the wreck of any vessel where the wreck occurred before 1900; and</p> <p>(ii) provides or may provide, through investigation by archaeological methods, evidence relating to the history of New Zealand; and</p> <p>(b) includes a site for which a declaration is made under section 43(1)</p>		
00322 Fulton Hogan Limited	00322.002	Oppose in part	<p>Definition -Primary production</p> <p>Amend as follows:</p> <p>Include the definition of Primary Production included in Chapter 14 of the National Planning Standards.</p> <p><u>“Primary Production means:</u></p> <p><u>(a) any aquaculture, agricultural, pastoral, horticultural, mining, quarrying or forestry activities; and</u></p> <p><u>(b) includes initial processing, as an ancillary activity, of commodities that result from the listed activities in a); includes any land and buildings used for the production of the commodities from a) and used for the initial processing of the commodities in</u></p>	The definition of primary production needs to match what is envisaged in the provisions in the plan. If possible, it ought to be consistent with conventional understandings to avoid confusion. Primary production does normally include aquaculture, forestry, and viticulture. Mining and quarrying is usually dealt with separately as it is extracting an existing resource rather than producing one.	Disallow

			<u>b); but excludes further processing of those commodities into a different product.</u>		
00021 Matakanui Gold Limited	00021.002	Support	<p>Definition - Primary Production</p> <p>Amend the definition of “primary production” to recognise that mineral extraction is not a suitable component of primary production as it relates to LFLS – P19 High and UFD – P7 – Rural Area which seeks to enable primary production (including mining) on land or soils identified as highly product</p>	The definition of primary production needs to match what is envisaged in the provisions in the plan. If possible, it ought to be consistent with conventional understandings to avoid confusion. Primary production does normally include aquaculture, forestry, and viticulture. Mining and quarrying is usually dealt with separately as it is extracting an existing resource rather than producing one.	Allow
00239 Federated Farmers of New Zealand	00239.008	Oppose in part	<p>Definition - Regionally Significant Infrastructure</p> <p>Amend as follows or similar:</p> <p>“Regionally Significant infrastructure means:</p> <p>(1) roads classified as being of regional importance in accordance with the One Network Road Classification,⁷</p> <p>(2) electricity sub – transmission infrastructure,</p> <p>(3) renewable electricity generation facilities that connect with the local distribution network but not including renewable electricity</p> <p>generation facilities designed and operated principally for supplying a single premise or facility,</p>	<p>Some infrastructure to supply water, manage inundation, stormwater, land drainage, and wastewater and provide communication and transport links may be regionally significant infrastructure but not all. Qualifiers are needed. It is unclear why community irrigation facilities are regionally significant infrastructure.</p> <p>It is also important to remember that just because infrastructure is regionally</p>	Disallow

		<p>(4) telecommunication and radiocommunication facilities,</p> <p>(5) facilities for public transport hubs, including terminals and stations,</p> <p>(6) the following airports: Dunedin, Queenstown, Wanaka, Alexandra, Balclutha, Cromwell, Oamaru, Taieri.</p> <p>(7) navigation infrastructure associated with airports and commercial ports which are nationally or regionally significant,</p> <p>(8) defence facilities,</p> <p>(9) community potable water systems drinking water abstraction, supply treatment and distribution infrastructure that provides no fewer than 25 households with drinking water for not less than 90 days each calendar year, and community water supply abstraction, treatment and distribution infrastructure (excluding delivery systems or infrastructure primarily deployed for the delivery of water for irrigation of land or rural agricultural drinking — water supplies)</p> <p>(10) community stormwater <u>and land drainage</u> infrastructure,</p> <p>(11) wastewater and sewage collection, treatment and disposal infrastructure serving no fewer than 25 households, and</p> <p>(12) Otago Regional Council's hazard mitigation works including flood protection infrastructure and drainage schemes and</p>	<p>significant is not a carte blanche to its development irrespective of environmental effects. This matter is best addressed in the plan provisions.</p>	
--	--	---	---	--

			<u>(13) Established community – scale irrigation and stockwater infrastructure.”</u>		
00213 Waitaki Irrigators Collective Limited	00213.002	Oppose	<p>Definition - Regionally significant infrastructure</p> <p>Amend the definition of regionally significant infrastructure: Regionally significant infrastructure means:</p> <p>...</p> <p><u>(10) Established community – scale irrigation and stockwater infrastructure.</u></p> <p>...</p>	The definition should be limited to infrastructure which is regionally significant. It is unclear why community irrigation schemes would be regionally significant.	Disallow
00138 Queenstown Lakes District Council	00138.106	Support in part	<p>Definition - Regionally significant infrastructure</p> <p>Amend to add as follows: “<u>(13) Municipal landfills and associated solid waste sorting and transfer facilities.</u>”</p>	It is very important that waste is effectively managed but some scale needs to be included to determine which of these facilities qualifies as regionally significant.	Allow
National Direction Instruments					
00226 Kāi Tahu ki Otago / Aukaha	00226.329	Support	<p>New provision</p> <p>Amend by including a map of Native Reserves and cross-referencing this from the Mana Whenua chapter</p>	Te Rūnanga o Ngāi Tahu considers that the relief sought supports the needs and aspirations of Ngāi Tahu Whānui.	Allow
Mana Whenua					
00125 Otago Rock Lobster Industry Association Inc	00125.013	Support	Recognise Kai Tahu’s fishing interests and rights beyond just customary ones – they encompass customary, commercial and recreational fishing	Kāi Tahu have fishing and aquaculture interests beyond customary and recreational. The purpose of the	Allow

and Pauamac 5 Incorporated				amendment requires further consideration.	
00121 Ravensdown Limited	00121.014	Oppose	MW-M1 As proposed MW-M1 states that Local Authorities must collaborate with Ngāi Tahu to identify and map outstanding natural features, landscapes, seascapes and highly valued natural features and record their value. Ravensdown seek that this is deleted.	It is unclear how local authorities can achieve the purpose of the RMA and give effect to s6(e), s7(a) and s8 matters in the Act without Kāi Tahu involvement in the identification of landscapes etc.	Oppose.
00226 Kāi Tahu Ki Otago/Aukaha	00226.039	Amend	Recognition of iwi and hapu Amend as follows: Kāi Tahu <u>whānui</u> are takata whenua of the Otago region... resource use and ahikāroa (the long burning fires of occupation). Te Rūnaka <u>Rūnanga</u> o Ngāi Tahu... Four <u>Three</u> Papatipu Rūnaka papatipu rūnaka are based in Otago... Three Ngāi Tahu ki Murihiku Rūnaka <u>Four further papatipu rūnaka</u>	Te Rūnanga o Ngāi Tahu is the statutory name including spelling of Rūnanga. The amendments sought are supported	Allow
00226 Kāi Tahu Ki Otago/Aukaha	00226.040	Amend	Various amendments to the chapter	Aukaha seek various amendments to the mana whenua chapter under this submission point. These clarify the position of Kāi Tahu as a Treaty partner. It also describes the obligations of Kāi Tahu as raketira and the role of whakapapa.	Allow
00226 Kāi Tahu Ki Otago/Aukaha	00226.047	Amend	MW-P3 Amendments are sought to MW-P3 replacing the term well being with hauora, and recognising	The amendments sought provide further detail which is relevant to the method.	Allow

			whakapapa connections with resources, and connections to practices such as mahinga kai.		
00010 Cain Whānau	00010.004	Amend	MW-P4 Amendments to enable the development Māori Land and resources for the benefit of owners, their whānau and hapū.	Elements of the submission are of assistance particularly the reference to ahi ka, however the submission suggests deletions which also are relevant to the consideration of Papakaika.	Allow in part.
00226 Kāi Tahu ki Otago / Aukaha	00226.049	Amend	MW-M1 Amendments to focus the method on matters of importance to Kāi Tahu, including waters and taoka, place names and sharing of information with Kāi Tahu	The focus of the method is helpful for plan users and is relevant to collaboration with Kāi Tahu.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.050	Amend	MW-M2 Amendments to MW-M2 to work in partnership with Kāi Tahu to incorporate mātauraka in resource management processes and decision making	Relief sought is consistent with NZCPS and best planning practices.	Allow
00223 Te Ao Marama	00223.037	Amend	MW-PR1 Amendments to explain the relationship between the Treaty and the RMA.	Relief sought provides clarity for plan users.	Allow
Resource Management Overview					
00136 Minister for the Environment	00136.002	Support	General There is not sufficient recognition of over – allocation as a significant issue for the region.	Te Rūnanga o Ngāi Tahu agrees that over-allocation, in particular in regard to deemed mining permits, is a significant issue for the region.	Allow

			Recommend adding in a discussion around the over – allocation and the historic context of deemed mining permits.		
00115 Oceana Gold (New Zealand) Ltd	00115.006	Oppose in part	<p>General</p> <p>This chapter of the PORPS also needs to better recognise and provide for mining which is a significant issue for the region because of the economic benefits it brings.</p>	Te Rūnanga o Ngāi Tahu agrees that the PORPS needs to address mining as it is a significant issue in the Region. However, it does into come to pass that it must be provided for because of its economic benefit, without management of its environmental effects.	Disallow
00235 OWRUG	00235.002	Oppose	<p>General</p> <p>Seeks that Part 2 of the pRPS acknowledges Te Mana o te Wai as a significant resource management issue for the region and that a transition period is required to achieve the environmental outcomes sought.</p>	<p>The PRPS must give effect to the NPSFM 2020 and the timeframes set out in that document.</p> <p>The relief sought does not reflect an appropriate framing of Te Mana o te Wai.</p>	Disallow
00115 Oceana Gold (New Zealand) Ltd	00115.005	Oppose	<p>Introduction</p> <p>Amend as follows:</p> <p>Include “minerals” as a natural resource on Figure 2.</p>	Te Rūnanga o Ngāi Tahu agrees that minerals are part of the natural resources of the Ōtākou Region. However, it does not come to pass that this means extraction of them is necessary or appropriate to achieve the purpose of the RMA. A much more considered approach to environmental management is required than a simple trade off of environmental cost for economic benefits or vice versa.	Disallow

00140 Waitaki District Council	00140.012	Support	<p>SMIR 13</p> <p>Amend to include reference to carbon forestry as a resource management issue for Otago (p.70, 71).</p>	Te Rūnanga o Ngāi Tahu considers that Carbon Forestry is a significant emerging issue for the region.	Allow
00412 Ernslaw One	00412.005	Oppose	<p>SMIR 15</p> <p>Make clear that the provisions of the NES Plantation Forestry 2017 take precedence over the NES Freshwater 2020. The regional council can only set rules that are more stringent than the NESPF 2017 if there is evidence that the controls in the NESPF 2017 are not sufficiently stringent to meet the Councils objectives for freshwater.</p>	Regional Council still has responsibilities under NPSFM which are not covered by the NESPF.	Disallow
00020 Raynoir Matarki Forests	00020.006	Oppose	<p>SMIR 15</p> <p>Insert new reference to the NESPF and the effect of its regulations and explain where plan provisions may be more stringent and refer to research which justifies any greater restrictions.</p>	Regional Council still has responsibilities under NPSFM which are not covered by the NESPF.	Disallow
00223 Te Ao Marama	00223.044	Support	<p>SMIR15</p> <p>Include discussion of over-allocation of water resources in Otago</p> <p>Amend the final sentence of the second paragraph under the heading Context, as follows:</p> <p>“ ... freshwater allocations can be adjusted to achieve a balance of prioritise protection of the mauri of water bodies, meet the health needs of</p>	Te Rūnanga o Ngāi Tahu considers that the relief sought better reflects Te Mana o Te Wai.	Allow

			people, and provide for economic, environmental , social and cultural needs well-being.		
00020 Raynoir Matarki Forests	00020.007	Support in part	SMIR 16 Insert new reference to the NESPF and the effect of its regulations and explain where plan provisions may be more stringent and refer to research which justifies any greater restrictions.	Agree that an explanation of the effects of the regulations and the interaction with the RMA would be beneficial	Allow in part
00223 Te Ao Marama	00223.045	Support	SMIR 16 Amend the final sentence of the second paragraph, as follows: “...culminates in loss <u>diminishing</u> of rakatirataka and mana.”	The amendment better describes the effect. Rakatirataka. Rakatirataka is not something that can ever be lost or diminished –mana whenua always hold rakatirataka, but when it is not recognised that reduces the mana of mana whenua.	Allow
00223 Te Ao Marama	00223.047	Support	SRMR 18 Amend the first sentence under the heading Impact Snapshot, as follows: “...pests, <u>fresh</u> water, and biodiversity loss.”	The relief sought supports the needs and aspirations of Ngāi Tahu Whānui.	Allow
00020 Raynoir Matarki Forests	00020.005	Support	SRMR I10 Amend as follows: Sediment from development and forestry activities <u>primary production activities</u> flow into streams and build up in the coastal environment, smothering kelp forests and affecting rich underwater habitats.	Te Rūnanga o Ngāi Tahu considers that the relief sought supports improves clarity.	Allow
Resource Management Issues of significance to iwi authorities in the region					
00223 Te Ao Marama	00223.049	Support	RMIA – WAI – I3	Te Rūnanga o Ngāi Tahu considers that the change of	Allow

			<p>Amend as follows:</p> <p><u>"It represents a significant loss for mana whenua and a diminishing of rakatirataka and of mana."</u></p>	<p>wording is appropriate because rakatirataka is not diminished by loss of ability to undertake mahika kai.</p> <p>Mana whenua always hold rakatirataka, but when it is not recognised that reduces the mana of mana whenua.</p>	
00226 Kāi Tahu ki Otago / Aukaha	00226.064	Support	<p>RMIA – WAI – I5</p> <p>Amend as follows:</p> <p>The effects of long duration of water take consents which lock in a pattern of resource use for a long time, limiting the ability for <u>of Kāi Tahu to exercise kaitiakitaka responsibilities their role as kaitiaki as an expression of mana and rakatirataka.</u></p>	<p>Te Rūnanga o Ngāi Tahu considers that the change of wording requested provides a better expression of Kāi Tahu concepts.</p>	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.066	Support	<p>RMIA – MKB – I1</p> <p>Amend as follows:</p> <p>Specific concerns include: ...</p> <ul style="list-style-type: none"> <u>• A persistent lack of recognition of Kāi Tahu perspectives, values and mātauraka in indigenous species and habitat management, planning, and decision – making, and</u> <u>• The loss of cultural knowledge, mātauraka, and tikaka that has accompanied the loss of mahika kai, and indigenous biodiversity</u> 	<p>Te Rūnanga o Ngāi Tahu considers that the proposed changes to wording increase clarity and precision in relation these important topics.</p>	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.067	Support	<p>RMIA – MKB – I2</p> <p>Amend as follows:</p>	<p>Te Rūnanga o Ngāi Tahu agrees that habitat and species loss is a critical factor</p>	Allow

			... Obstacles include lack of physical access, <u>habitat and species loss</u> , and the sites no longer being safe to access due to the site becoming polluted, or a change in flow velocity and/or depth.	in loss of ability to undertake mahika kai.	
00226 Kāi Tahu ki Otago / Aukaha	00226.068	Support	RMIA – MKB – I3 Amend as follows: Climate change is now affecting and will continue to affect habitat availability and suitability for species in Otago. ... Where possible, these effects should be planned for in environmental management, <u>including regard the impacts on Kāi Tahu and mana whenua values.</u>	It is appropriate to emphasize Ngāi Tahu and mana whenua concepts in this context.	Allow
00223 Te Ao Marama	00223.050	Support	RMIA – WTU – I1 Amend as follows: “Land, <u>freshwater and coastal</u> management regimes have failed to ...” - Amend to recognise that management of wāhi tūpuna extends beyond land use matters. - Amend to recognise that wāhi tapu and wāhi taoka include nohoaka sites and therefore freshwater management as well as land use matters and matters of access are significant issues.	The relief sought improves clarity of scope.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.073	Support	RMIA – WTA – Wāhi tapu and wāhi taoka Amend as follows: ... This is reflected in Te Reo <u>te reo</u> Māori, as the word... For Kāi Tahu, <u>the terms wāhi tapu and wāhi taoka refers to places with elevated mana and tapu due to their close association with atua and tūpuna.</u>	It is appropriate to increase the focus on wāhi tapu and wāhi taoka.	Allow

			<p><u>For example: that hold the respect of the people in accordance with tikaka or history including:</u></p> <p>Mauka (mountains), <u>awa (rivers), roto (lakes), tai (coasts), and moana (seas), ...</u></p>		
00226 Kāi Tahu ki Otago / Aukaha	00226.074	Support	<p>RMIA – WTA – I1</p> <p>Amend as follows:</p> <p>Specific concerns include:</p> <ul style="list-style-type: none"> • ... <p>The resurfacing of kōiwi takata (human remains) through natural and human – induced process, <u>such as climate change</u>, and ensuring...</p>	Te Rūnanga o Ngāi Tahu supports the identification of unexpected consequences of climate change.	Allow
00223 Te Ao Marama	00223.051	Support	<p>RMIA – WTA – I2</p> <p>Amend to recognise that wāhi tapu and wāhi taoka include nohoaka sites and therefore freshwater management as well as land use matters and matters of access are significant issues.</p>	Nohoaka sites are often places where use of water and land overlap.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.076	Support	<p>RMIA – AA – Air and Atmosphere</p> <p>Amend context as follows:</p> <p>... Pollution of the atmosphere adversely affects the mauri of air as a taoka, and other taoka such as plants and animals <u>that rely on the life-supporting properties of air.</u></p>	Te Rūnanga o Ngāi Tahu see it as appropriate to emphasize the life-supporting properties of air, and emphasis which is often overlooked through a focus on other matters.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.077	Support	<p>RMIA – AA – I1</p> <p>Amend as follows:</p> <p>Specific concerns include:</p>	The relief sought emphasises specific consequences of climate change for kaitiaki rūnaka.	Allow

			Potential impacts of climate change which could potentially negatively affect taoka such as wai Māori <u>māori and wai tai</u> , mahika kai and biodiversity, wāhi tūpuna, wāhi tapu, and wāhi taoka, coastal <u>environment and the well-being of all people, and the environment as an integrated system.</u>		
00226 Kāi Tahu ki Otago / Aukaha	00226.080	Support	RMIA – CE – I2 Add as follows: <u>Discharge of liquid human waste from mortuaries and funeral homes into stormwater systems and coastal waters.</u>	Discharges of liquid human waste from mortuaries and funeral homes are a particularly high priority for effective management.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.083	Support	RMIA – CE – I5 Amend as follows: ... the coastal waters of Te Tai o Ara Te Uru Tai – o – Araiteuru... Specific concerns include: • Damage to and disturbance of wāhi tapu resulting from coastal erosion <u>and the impacts of climate change</u> , earthworks... • ... Failure to recognise and provide for the effects <u>of climate change</u> , and of changing sea levels on coastal landscapes.	Te Rūnanga o Ngāi Tahu considers that the relief sought improves accuracy, and puts appropriate emphasis on the consequences of climate change.	Allow
00223 Te Ao Marama	00223.052	Support	RMIA – PO – Pounamu Amend to recognise that protecting pounamu is about integrated management of lands and waters rather than just a concern associated with land use,	Te Rūnanga o Ngāi Tahu considers that the relief sought improves accuracy.	Allow

			and to recognise the work that has been done within the tribe to improve pounamu management.		
Integrated Management					
00226 Kāi Tahu ki Otago / Aukaha	00226.005	Support	General Amend provisions (as set out separately) to provide for better integration between freshwater and the coastal environment, and to make the link between land management and freshwater outcomes clearer.	Te Rūnanga o Ngāi Tahu considers that it is appropriate to make clear links between land management and fresh water.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.085	Support	IM-01 Amend as follows: The management of natural and physical resources in Otago, by and for the people of Otago, <u>including and in partnership with</u> Kāi Tahu, ...	Te Rūnanga o Ngāi Tahu considers that it is appropriate to emphasise partnership as consistent with RMA Part II and the Principles of the Treaty of Waitangi.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.087	Support	IM-03 Amend as follows: Otago's communities carry out their activities in a way that preserves environmental integrity, form, function, and resilience, so that the life-supporting capacities in air, water <u>including wai māori and wai tai</u> , soil, ecosystems, and indigenous biodiversity endure for future generations.	The relief sought improves clarity and emphasis on key values.	Allow
00223 Te Ao Marama	00223.054	Support	IM-04 Amend, as follows: “... achieving the <u>long term vision and</u> outcomes sought by this RPS for the region.”	The relief sought increases emphasis on the long-term Vision, which will be key to integrating various regulatory and community requirements in a way which puts health of	Allow

				water bodies first, as per Te Mana o te Wai.	
00223 Te Ao Marama	00223.055	Support	IM-P1 Amend as follows: "... (1) all activities are carried out within the environmental constraints of <u>described in this RPS</u> , ..."	The relief sought improves clarity – the RPS does not simply 'constrain'.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.091	Support	IM-P3 Amend as follows: Recognise and provide for Kāi Tahu's relationship with natural resources by: ... (2) Facilitating active participation of mana whenua in resource management <u>processes and</u> decision making, (3) Incorporating mātauraka Māori in <u>processes and</u> decision making, and Ensuring resource management provides for the connections of Kāi Tahu to wāhi tūpuna, wai māori and wai tai, <u>awa, roto and water and water bodies</u> , the coastal environment, te takutai moana, and mahika kai and habitats of taoka species.	The relief sought increases emphasis on values of importance to Ngāi Tahu.	Allow
00213 Waitaki Irrigators Collective Limited	00213.006	Oppose	IM-P3 Amend wording as follows: Recognise and provide for Kāi Tahu's relationship with natural resrouces by:	Kaitiakitaka is inseparable from rakatirataka which is guaranteed in Article 2 of Te Tiriti o Watiangi. s Removing the word 'rakatirataka' fails to give effect to Part II of the RMA including sections 7(a) and 8.	Disallow

			(1) enabling manawhenua to exercise rakaitirataka and kaitiakitaka And remove other references to rakaitirataka		
00226 Kāi Tahu ki Otago / Aukaha	00226.092	Support	IM-P4 Amend as follows: Healthy ecosystems and ecosystem services are achieved through a planning framework that: (1) ... Takes a long-term strategic approach that recognises changing environments <u>and the impacts of climate change</u> , ...	It is appropriate to emphasize the impacts of climate change.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.093	Support	IM-P5 Amend as follows: Coordinate the management of interconnected natural and physical resources by recognising the providing for: <u>The effects of land usage and upstream activities on water quality for wai māori and wai tai, ...</u>	The relief sought is appropriate because the interconnection between land and water is a critical issue for kaitiaki rūnaka.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.096	Support	IM-P8 Amend as follows: Recognise and provide for climate change processes and risks by identifying climate change impacts in Otago, including impacts from a te ao Māori the perspectives of Kāi Tahu as <u>mana whenua</u> , assessing how the impacts are likely to change over time and anticipating those changes in resource management processes and decisions.	The relief sought increases clarity by shifting the focus to Kāi Tahu as mana whenua.	Allow

00226 Kāi Tahu ki Otago / Aukaha	00226.097	Support	<p>IM-P9</p> <p>Amend as follows:</p> <p>By 2030 Otago's communities, <u>including Kāi Tahu</u>, have established responses for adapting to the impacts of climate change, are adjusting their lifestyles to follow them, and are reducing their greenhouse gas emissions to achieve net – zero carbon emissions by 2050.</p>	It is appropriate to specifically recognise Kāi Tahu in this context.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.098	Support	<p>IM-P10</p> <p>Amend as follows:</p> <p>Identify and implement climate change adaptation and mitigation methods for Otago that:</p> <p>Minimise the effects of climate change processes or risks to existing activities <u>the environment, including wai māori and wai tai, whenua ki uta and whenua ki tai, and air and atmosphere, ...</u></p>	Te Rūnanga o Ngāi Tahu considers that the relief sought is a helpful clarification of values likely to be affected by climate change.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.101	Support	<p>IM-P13</p> <p>Amend as follows:</p> <p>Otago's environmental integrity, form, function, and resilience, <u>including resilience to climate change, ...</u></p>	It is important to emphasize resilience to climate change.	
00226 Kāi Tahu ki Otago / Aukaha	00226.102	Support	<p>IM-P14</p> <p>Amend as follows:</p> <p>Preserve opportunities for future generations by: (1) ...</p> <p>3) regularly assessing and adjusting limits and thresholds for activities over time in light of the</p>	It is important to emphasize that adjustments required over time may include adjustments to reduce impacts on climate change.	Allow

			actual and potential impacts, <u>including those related to climate change.</u>		
00226 Kāi Tahu ki Otago / Aukaha	00226.104	Support	<p>IM-M1</p> <p>Amend as follows:</p> <p>Local authorities must prepare or amend and maintain their regional and district plans to:</p> <p>(1) ...</p> <p>(4) ensure cumulative effects of activities on natural and physical resources are accounted for ...</p> <p>(h) <u>effects occurring across regional boundaries, ...</u></p> <p>(5) adopt a ki uta ki tai approach to resource ... including collaboration between local <u>and regional</u> authorities to achieve consistent management of resources or effects that cross jurisdictional <u>and regional</u> boundaries, and establish clear thresholds for, and limits on, activities that have the potential to adversely affect healthy ecosystems services, <u>mana whenua values</u>, and intrinsic values.</p>	Te Rūnanga o Ngāi Tahu considers that mana whenua values should be specifically recognised in M1.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.105	Support	<p>IM-M2</p> <p>Amend as follows:</p> <p>Starting immediately, local authorities must:</p> <p>(1) partner with Kāi Tahu to ensure mana whenua involvement in resource management <u>processes, and decision – making, ...</u></p>	Te Rūnanga o Ngāi Tahu considers that the relief sought is a very positive change which makes it clear what mana whenua are involved in. It is also consistent with RMA Part II (section 8) which refers to the Principles of the Treaty of Waitangi, which include the principle of rakatirataka.	Allow

00226 Kāi Tahu ki Otago / Aukaha	00226.108	Support	<p>IM-M5</p> <p>Amend as follows:</p> <p>Local authorities should:</p> <p>(1) at their next plan review or by December 2030, whichever is sooner, align (to the extent possible) all strategies and management plans prepared under other legislation, <u>and any subsequent additions or amendments to such</u>, to contribute to the attainment of the long-term vision for Otago, and</p> <p>(2) ...</p> <p>encourage changes to business practice that will enable businesses <u>and communities</u> to function in a net – zero carbon economy,</p> <p>and ...</p>	The relief sought provides helpful clarification.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.110	Support	<p>IM-PR1</p> <p>Amend to add the following:</p> <p><u>The focus on integrated management will remain under any changes in legislation over the relevant time period.</u></p>	The relief sought provides helpful clarification	Allow
00223 Te Ao Marama	00223.059	Support	<p>IM-AER1</p> <p>Amend as follows:</p> <p>“... and are resulting in environmental well-being <u>and resilience in the natural environment</u>.”</p>	The relief sought provides helpful clarification	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.111	Support	<p>IM-AER2</p> <p>Amend as follows:</p>	The relief sought provides helpful clarification – it is	Allow

			Environmental well-being and resilience is resulting in sustainable social, cultural and economic well-being <u>for all communities including Kāi Tahu.</u>	important to specifically recognise Kāi Tahu.	
00226 Kāi Tahu ki Otago / Aukaha	00226.112	Support	IM-AER3 Amend as follows: Communities, <u>including Kāi Tahu</u> , are aware of the potential impacts of climate change and there are supported to make observable changes in community behaviour towards more sustainable lifestyles.	The changes required of communities will require a supportive approach.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.113	Support	IM-AER4 Amend as follows: Plan development and decision – making processes demonstrate improved awareness of the interdependence and interconnectedness of natural and physical resources within the region, <u>and across regional and jurisdictional boundaries.</u>	It is important to recognise and effectively deal with issues which cross regional and jurisdictional boundaries. The proliferation of wallabies and wilding pines for example area risks to all of the dry hill and high country of South Canterbury, Otago, and Southland will require a coordinated response.	Allow

Air					
00226 Kāi Tahu ki Otago / Aukaha	00226.114	Support	AIR-01 Amend as follows: Ambient air quality provides for the health and well-being of the people of Otago, amenity and mana whenua values, and the life-supporting capacity of ecosystems.:	The relief sought improves clarity.	Allow

			<u>(1) the life-supporting capacity of ecosystems,</u> <u>(2) mana whenua values,</u> <u>(3) the health and well-being of the people of Otago, and amenity.</u>		
00226 Kāi Tahu ki Otago / Aukaha	00226.115	Support	AIR-02 Amend as follows: Human health, amenity and mana whenua values and the life-supporting capacity of ecosystems, <u>mana whenua values, and amenity</u> are protected from the adverse effects of discharges to air.	The relief sought improves clarity.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.117	Support	AIR-P2 Amend as follows: Poor ambient air quality is improved across Otago by: <u>actively monitoring air quality and taking action to address air quality when NESAQ standards have been breached, ...</u>	Monitoring air quality will assist in the implementation of the proposed RPS and assessing against AER.	Allow
00239 Federated Farmers of New Zealand	00239.053	Oppose	AIR-P3 Amend as follows: “Allow discharges to air provided they do not adversely affect human health, amenity and mana whenua values and the life supporting capacity of ecosystems. “	The amendment fails to give effect to s5 or s6(e) of the RMA. Discharges to air can affect the health and cultural well-being of mana whenuagenerally, and where an inappropriate discharge is over a sensitive site or area such as wāhi tapu.	Disallow
00226 Kāi Tahu ki Otago / Aukaha	00226.121	Support	AIR-P6	Te Rūnanga o Ngāi Tahu agrees with the submitter that	Allow

			<p>Amend as follows:</p> <p>Avoid discharges to air that adversely affect mana whenua values by having particular regard to values and areas of significance to mana whenua. <u>When assessing the impact of discharges to air on mana whenua values, have particular regard to sites and landscapes of significance to Kāi Tahu, including wāhi tūpuna, wāhi tapu, and wāhi taoka.</u></p>	<p>decisions on the effects of discharges to air should have particular regard to sites and landscapes of significance to Kāi Tahu, including wāhi tūpuna, wāhi tapu, and wāhi taoka.</p>	
00223 Te Ao Marama	00223.062	Support	<p>AIR-P6</p> <p>Amend as follows:</p> <p>“... and areas of significance to mana whenua, <u>including wāhi tūpuna.</u>”</p>	<p>The relief sought provides helpful clarification.</p>	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.122	Support	<p>AIR-M2</p> <p>Amend as follows:</p> <p>No later than 31 December 2024, Otago Regional Council must prepare or amend its regional plans to:</p> <p>avoid offensive, objectionable, noxious or dangerous discharges to air, <u>or those that affect mana whenua values.</u> ...</p>	<p>The relief sought provides helpful clarification.</p>	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.124	Support	<p>AIR-M4</p> <p>Amend as follows:</p> <p>Otago Regional Council must monitor no less frequently than quarterly and report no less frequently than annually on:</p> <p>(1) ...</p>	<p>The relief sought will increase transparency as to actions being undertaken to improve air quality, as well as outcomes being achieved.</p>	Allow

			<u>Actions being taken to address air quality in polluted airsheds.</u>		
00226 Kāi Tahu ki Otago / Aukaha	00226.125	Support	<p>AIR-M5</p> <p>Amend as follows:</p> <p>In collaboration with territorial authorities, wi authorities, key stakeholders and industry, and in partnership with Kāi Tahu, Otago Regional Council must ... including: ...</p> <p><u>having particular regard to the needs of vulnerable, deprived and isolated communities and people in Otago, and with particular regard to polluted airsheds, in undertaking these actions.</u></p>	The relief sought provides clarity and highlights the needs of vulnerable, deprived and isolated communities and people.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.126	Support	<p>AIR-E1</p> <p>Amend as follows:</p> <p>The policies in this chapter are designed to achieve and maintain good air quality for Otago by requiring improvements where air quality is poor, maintaining it where it is good. <u>Regular monitoring and reporting on air quality in Otago will be undertaken to identify polluted airsheds, in order to progress towards attainment and maintenance of the ambient air quality standards.</u> ...</p> <p>This is required to ensure monitoring of ambient air quality is <u>ongoing and</u> accurate ...</p>	It is appropriate to increase the emphasis on monitoring and reporting because this will improve knowledge of impacts of poor air quality, as well as progress being made.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.127	Support	<p>AIR-PR1</p> <p>Amend as follows:</p> <p>... During the winter months however, temperatures drop and emissions from home heating increase,</p>	The relief sought provides clarity and highlights the needs of vulnerable, deprived and isolated communities and people.	Allow

			<p><u>with higher emissions evident in economically deprived areas.</u> ...</p> <p>... a collaborative approach with central government, other local authorities, stakeholders, <u>communities</u>, and industry, <u>and in partnership with Kāi Tahu as mana whenua</u>, will support the achievement of the objectives over time.</p>	Also, partnership with Kāi Tahu is appropriate in giving effect to the proposed RPS.	
00226 Kāi Tahu ki Otago / Aukaha	00226.128	Support	<p>AIR-AER1</p> <p>Amend as follows:</p> <p><u>Airsheds are regularly monitored to identify polluted airsheds, and action is taken when air quality standards have been breached, to ensure</u> Where air quality is poor, there is a decreasing trend in concentrations of PM10 and PM2.5.</p>	It is appropriate to increase the emphasis on monitoring and reporting because this will improve knowledge of impacts of poor air quality, as well as progress being made.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.129	Support	<p>AIR-AER4</p> <p>Amend as follows:</p> <p>There is a decrease in the number of complaints regarding offensive, objectionable, noxious or dangerous discharges into air, <u>or those that adversely affect mana whenua values.</u></p>	Adverse air quality can affect mana whenua values from a general perspective and also more specifically in sensitive locations.	Allow
Coastal Environment					
00223 Te Ao Marama	00223.0 63	Support	<p>General</p> <p>Amend to ensure this chapter supports a ki uta ki tai approach to resource management, supports Treaty Settlement mechanisms, applies the Treaty principle of active protection and references climate change response.</p>	A key element of ki uta ki tai is that the coast is often a receiving environment for upstream activities, as well as being vulnerable to climate change.	Allow

00125 Otago Rock Lobster Industry Association Inc and Pauamac 5 Incorporated	00125.0 14	Support in part	<p>General</p> <p>Using the Fisheries Act (FA) and the Resource Management Act (RMA) in a co – ordinated and complementary manner (so that adverse effects of activities are managed under the most appropriate statute) is central to achieving integrated management.</p>	Te Rūnanga o Ngāi Tahu agrees that the Fisheries Act and RMA have certain intersection points and that these need to be managed appropriately, however this should not be to the detriment of integrated management under the RMA and Councils must still discharge their duties under the RMA.	Allow in part
00122 Sanford Ltd.	00122.007	Support	<p>New Objective:</p> <p>Insert a new objective into Chapter CE along the lines of Objective 6 in the NZCPS which states: <u>“Objective 6</u> <u>To enable people and communities to provide for their social, economic, and cultural wellbeing and their health and safety, through subdivision, use, and development, recognising that:</u></p> <ul style="list-style-type: none"> – <u>the protection of the values of the coastal environment does not preclude use and development in appropriate places and forms, and within appropriate limits;</u> – <u>some uses and developments which depend upon the use of natural and physical resources in the coastal environment are important to the social, economic and cultural wellbeing of people and communities;</u> – <u>functionally some uses and developments can only be located on the coast or in the coastal marine area;</u> – <u>the coastal environment contains renewable energy resources of significant value;</u> – <u>the protection of habitats of living marine resources contributes to the social, economic</u> 	The proposed new objective recognises that there can be a functional need for certain activities to be located in the coastal environment. The objective may need some refinement to ensure consistency with the NZCPS.	Allow in part

			<p><u>and cultural wellbeing of people and communities;</u></p> <ul style="list-style-type: none"> - <u>the potential to protect, use, and develop natural and physical resources in the coastal marine area should not be compromised by activities on land;</u> - <u>the proportion of the coastal marine area under any formal protection is small and therefore management under the Act is an important means by which the natural resources of the coastal marine area can be protected; and</u> <p><u>historic heritage in the coastal environment is extensive but not fully known, and vulnerable to loss or damage from inappropriate subdivision, use, and development.”</u></p>		
00223 Te Ao Marama	00223.077	Support	<p>New AER:</p> <p>Include a new Anticipated Environmental Results ahead of CE – AER1, as follows:</p> <p>“The mauri of the coastal environment is protected and restored where it has been degraded.”</p> <p>“Customary uses, including practices associated with mahika kai and kaimoana, are supported, and manawhenua are able to exercise their kaitiaki role within the coastal environment.”</p>	The AER is appropriate and provides a measurable approach.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.014	Support	<p>CE – general</p> <p>Amend to give priority to the health and wellbeing of coastal waters and ecosystems with greater consideration of environmental and cultural effects of activities in the coastal environment.</p>	Agree that the chapter requires greater clarity in terms of how the wellbeing of coastal waters and ecosystems is prioritised.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.015	Support	<p>CE – general</p>	Consistent with ki uta ki tai, and duty on the Council to	Allow

			Amend to achieve a more integrated and holistic approach to coastal management that better recognises the relationships between terrestrial, freshwater and coastal ecosystems.	achieve integrated management.	
00226 Kāi Tahu ki Otago / Aukaha	00226.016	Amend	CE – general Address gaps in the chapter to manage effects of sedimentation, dredging, discharges that physically modify the coast.	The relief sought is consistent with section 12 of the RMA and the NZCPS.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.019	Support	CE – general Amend to better recognise and provide for customary fisheries, mahinga kai and kaimoana practices.	Relief sought better reflects s6(e) RMA.	Allow
00314 Transpower New Zealand Limited	00314.015	Oppose	CE-P1 Amend as follows: “Recognise that: 1. coastal hazards must be identified in accordance with CE – P2(4) and managed in accordance with the HAZ – NH – Natural hazards section of this RPS; 2. port activities must be managed in accordance with the TRAN – Transport section of this RPS; and 3. historic heritage must be managed in accordance with the HCV – Historical and cultural values section of this RPS; <u>and</u> <u>National Grid activities must be managed in accordance with the relevant provisions in the EIT – INF section of this RPS and, in the event of any conflict between provisions, the provisions the EIT – INF section prevail.</u> ”	The relief sought may not be consistent with the NZCPS.	Disallow

00315 Aurora Energy Limited	00315.023	Oppose	CE-P4 Amend to provide a carve out for infrastructure using the effects hierarchy.	A 'carve out' may not achieve integrated management and is likely to be inconsistent with NZCPS provisions which apply to natural character in the coastal environment, and Part 2 of the RMA.	Disallow
00305 Waka Kotahi NZ Transport Agency	00305.013	Support in part	CE-P4 Amend to identify that regionally and nationally significant infrastructure is provided in the coastal environment and shall be provided for.	Regionally and nationally significant infrastructure must be provided in a way that in as far as possible is sensitive to the environment and values of Kāi Tahu. To that end, the relief sought needs qualifiers to achieve the purpose of the RMA.	Allow in part.
00226 Kāi Tahu ki Otago / Aukaha	00226.139	Support	CE-P4 Amend as follows: ... (4) encouraging de-reclamation of redundant reclaimed land where it would restore the natural character and resources of the coastal marine area and provide for more public open space, and ... (5) <u>(4) promoting activities and restoration projects that will restore or rehabilitate natural character in the coastal environment where it has been reduced or lost, while (7) recognising the enduring ancestral relationship of mana whenua with the coast and providing for mana whenua settlement and cultural use of Native Reserves and Te Ture Whenua Māori land.</u>	Assists the Council in discharging its duties under section 6(e) of the RMA.	Allow
00223 Te Ao Marama	00223.071	Support	CE-P6	The ability to restore but particularly to enhance natural features, landscapes	Allow

			Amend (4), as follows: "... where they have been reduced or lost in order to achieve Objective CE – O1.	or seascapes should be able to be encouraged whether lost or not.	
00314 Transpower New Zealand Limited	00314.018	Oppose in	<p>CE-P6</p> <p>Amend as follows:</p> <p>Delete Policy CE – P6.</p> <p>AND</p> <p>Insert a new Policy in EIT – INF that sets out specific direction in respect of the National Grid in the Coastal Environment that, in the event of conflict, prevails over policies in the CE section of the Proposed ORPS.</p> <p>OR</p> <p>Amend Policy CE – P6 as follows:</p> <p>"Protect natural features, landscapes and seascapes in the coastal environment by:</p> <ol style="list-style-type: none"> 1. identifying their areas and values in accordance with APP9, 2. avoiding adverse effects of activities on outstanding natural features, landscapes or seascapes, <p>avoiding significant adverse effects and avoiding, remedying, or mitigating other adverse effects of activities on other natural features and natural landscapes or seascapes,</p>	A policy to provide direction on how to balance National Grid requirements in the Coastal Environment may be required but not one that completely prevails. The second relief is preferred.	<p>Disallow first relief</p> <p>Allow second relief in part</p>
00226 Kāi Tahu ki Otago / Aukaha	00226.143	Support	<p>CE-P8</p> <p>Amend as follows:</p> <p>Maintain or enhance public <u>walking</u> access to and along the coastal marine area, and <u>control</u></p>	It is appropriate to have a different approach for vehicle and walking access.	Allow

			<p><u>vehicular access</u>, unless restricting public access is necessary: ...</p> <p>... (5) to protect places or areas of significance to <u>takata mana</u> whenua, including <u>wāhi tūpuna</u>, wāhi tapu and wāhi <u>taoka</u>, tūpuna</p>		
00226 Kāi Tahu ki Otago / Aukaha	0226.144	Support	<p>CE-P9</p> <p>Amend as follows:</p> <p>The strategic and coordinated use of land within the coastal environment is achieved by:</p> <p>(1) <u>identifying areas where particular activities and uses are inappropriate</u>,</p> <p>(2)1. avoiding sprawling or sporadic patterns of subdivision, use and development,</p> <p>(3) 2. considering the rate at which built development should be enabled to provide for the reasonably foreseeable needs of population growth without compromising the values of the coastal environment,</p> <p>(4) <u>controlling the location, density, scale and form of buildings, structures, earthworks, mining and other activities in the coastal environment</u>, ...</p> <p>(5)...</p> <p>(6) <u>recognising takata whenua needs for papakāika, marae and associated developments within the coastal environment and making appropriate provision for them, and avoiding the adverse visual impacts of development on sensitive areas, including headlands and prominent ridgelines</u></p>	The requested change improves consistency with the NZCPS.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.145	Support	<p>CE-P10</p> <p>Amend as follows:</p>	The requested change improves consistency with the	Allow

			<p><u>Only provide for use and development in the coastal marine area must in appropriate places and where</u></p> <p><u>it will: ...</u></p> <p>(1) enable multiple uses of the coastal marine area wherever reasonable and practicable,</p> <p>(2) (2) maintain or improve the integrity, form, function and resilience of the coastal marine area and the</p> <p>(3) <u>health of coastal waters and ecosystems, and</u></p> <p>(4) (3) have a functional or operational need to be located in the coastal marine area, or</p> <p>(5) (4) have a public <u>open space</u> benefit or opportunity for public recreation that cannot practicably be located</p> <p>(6) outside the coastal marine area, <u>or provide for the cultural wellbeing of Kāi Tahu as mana whenua and mana moana.</u></p>	NZCPS and section 6(e) of the RMA.	
00226 Kāi Tahu ki Otago / Aukaha	00226.147	Support	<p>CE-P12</p> <p>Amend as follows: CE – P12 – Reclamation and <u>De – reclamation</u></p> <p><u>Avoid reclamation in the coastal marine area, and encourage de – reclamation of redundant reclaimed land where it would restore the natural character, resources and functioning of the coastal marine area and provide for more public open space. .</u></p> <p>unless: 1. land outside the coastal marine area is not available for the proposed activity, 2. the activity to be established on the reclamation can only occur immediately adjacent to the coastal marine area, 3. there are no practicable alternative methods of</p>	The policy as notified is targeted to avoiding reclamation in the coastal marine area. There may also be instances where de-reclamation is sought and appropriate.	Allow

			providing for the activity, and the reclamation will provide significant regional or national benefit.		
00226 Kāi Tahu ki Otago / Aukaha	00226.148	Support	<p>CE-P13</p> <p>Renumber and amend as follows:</p> <p>CE – P13 <u>P4 – Rakatirataka and Kaitiakitaka</u></p> <p>Recognise and provide for <u>give practical effect to Kāi Tahu rakatirataka</u> and the role of Kāi Tahu as kaitiaki of</p> <p>the coastal environment by:</p> <p>(1) <u>facilitating partnership with, and actively</u> involving mana whenua in decision making and management</p> <p>processes in respect of the coast,</p> <p>(2) <u>sustaining the environmental, social, cultural and economic relationships of Kāi Tahu with Te Tai o Arai –te – uru,</u></p> <p>(3) identifying, protecting, and improving where degraded, sites, areas, waters and values of importance to</p> <p>Kāi Tahu within the coastal environment, and managing these in accordance with tikaka,</p> <p>(4) providing for customary uses, including mahika kai and the harvesting of kaimoana,</p> <p>(5) incorporating the impact of activities on customary fisheries, <u>including mātaihai reserves and taiāpure</u>, in decision making, and incorporating mātauraka Māori in the management and monitoring of activities in the coastal environment.</p>	Implements Part II of the RMA specifically section 6(e) and 8.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.152	Support	<p>CE-M2</p> <p>Amend to address the matters for clarification</p>	Clarifications sought by the submitter assist in	Allow

			<p>raised.</p> <ul style="list-style-type: none"> - Clause 2 – integration concerns raised in our submission to CE – P6 include the reference to 'highly valued natural features and landscapes' in CE – O2. This method only refers to identification of 'outstanding' features, landscapes and seascapes – more restricted than CE – P6(1). - Clause 3 – integration matters between ECO provisions and CE – P5 are raised elsewhere in this submission, with clarification on this also needed in relation to this method. - Clause 4 – the inclusion of 'significant indigenous biodiversity' terminology in this clause furthers the lack of clarity between CE and ECO biodiversity provisions. - Table 2 – these appear to be Schedule 2.1 coastal protection areas from the Regional Plan Coast. It is unclear why these are chosen for prioritisation given the age of the Coastal Plan, the fact that these are all in the CMA and do not include any land – based areas, and that a comprehensive natural character and landscape study for Otago's coastline was commissioned in 2015 by ORC and territorial authorities. <p>The 2015 study provides a better starting point for compilation of such a list. It is also noted that Table 2 does not contain macrons and has some incorrect spelling, e.g., Pūrākaunui Inlet not Purakanui Inlet.</p> <ul style="list-style-type: none"> - Other areas to be identified in CE – P2 include areas of deteriorated water quality and areas where mana whenua have a particular cultural interest. These are not listed in CE – M2 but are included in CE – M3 in terms of mapping in regional plans. There should be inclusion in the methods of how Kāi Tahu and any other relevant 	<p>understanding of the policy statement.</p>	
--	--	--	--	---	--

			<p>parties will be involved in the identification of these areas.</p> <p>There are no timeframes in CE – M2. Given the timeframes in CE – M1 and CE – M3, it is believed that including timeframes in CE – M2, at least in relation to matters to be mapped and included in regional plans, would provide useful guidance to involved parties.</p>		
00226 Kāi Tahu ki Otago / Aukaha	00226.153	Support	<p>CE-M3</p> <p>Amend as follows, and make any further amendments necessary to address the issues of concern raised by this submission: Otago Regional Council must prepare or amend and maintain its regional plans no later than 31 December 2028 <u>2025</u> to:</p> <p>(1) map, and include policies and rules to manage, areas of deteriorated water quality in the coastal environment, in accordance with CE – P2(2) and CE – P3and CE – P2(3),</p> <p><u>(2) set water quality targets for coastal waters in accordance with CE – P3,</u></p> <p><u>(3) map, and include policies and rules to manage, areas of coastal water where mana whenua have a particular cultural interest, including wāhi tūpuna,</u></p> <p><u>(4) recognise and map statutory acknowledgement areas, tōpuni and nohoaka identified in the NTCSA 1998, along with any customary fisheries,</u></p> <p>(5) 2- map the areas and characteristics of, and access to, nationally and regionally significant surf breaks,</p> <p>(6) 3- require development to be set back from the coastal marine area where practicable to protect the <u>functioning, resilience and health of coastal</u></p>	Amendments sought improve consistency with the policies of the OPRPS.	Allow

			<p><u>waters and ecosystems</u>, natural character, open space, public access, <u>cultural</u> and amenity values of the coastal environment,</p> <p>7) 4. manage the discharge of contaminants <u>and sediments</u> into coastal water, <u>and disturbance of sediments within the coastal marine area</u>, in accordance with policies CE – PXX, by: a. only enabling the use of small mixing zones before the ...</p> <p>(8) 5. control the use and development of the coastal marine area, in order to:</p> <p>(a) <u>as a priority, protect and enhance the functioning, resilience and health of coastal waters and coastal ecosystems.</u></p> <p><u>(b) avoid adverse effects on areas of deteriorated water quality or areas of coastal waters where mana whenua have a particular cultural interest.</u></p> <p><u>(c) avoid adverse effects on customary fisheries, mahika kai and kaimoana activities.</u></p> <p>(d) preserve the natural character; natural landscapes, features, and seascapes; <u>wāhi tūpuna</u> and indigenous biodiversity of the coastal marine area in accordance with CE – P4, CE – P5, <u>HCV – WT – P2</u> and CE – P6, and (e) manage Otago's nationally and regionally significant surf breaks in accordance with CE – P7,</p> <p>(9) control vegetation modification and removal in the coastal marine area, while allowing for mahika kai and kaimoana activities,</p> <p>(10)6. include provisions requiring the adoption of a precautionary approach to assessing the effects of activities in the coastal environment in accordance with IM – P15 where:</p> <p><u>(a) the activity may affect areas of deteriorated</u></p>		
--	--	--	---	--	--

			<p><u>water quality,</u></p> <p><u>(b) the activity may affect areas of coastal waters where mana whenua have a particular cultural interest,</u></p> <p><u>(c) the activity may affect customary fisheries, mahika kai or kaimoana activities,</u> (d) there is scientific uncertainty, or</p> <p>(e) there are potentially significant or irreversible adverse effects</p> <p>(11)7. identify areas <u>that may be appropriate for aquaculture and the forms and limits an appropriate level of cultural and environmental effects</u> associated with providing for aquaculture that will enable achievement of objectives CE – O1 to CE – O5,</p> <p>(12)8. provide for walking access to and along the coastal marine area in accordance with Policy 19 of the NZCPS <u>CE – P8,</u></p> <p>(13)9. control vehicle access to and along the coastal marine area in accordance with Policy 20 of the NZCPS <u>CE – P8,</u></p> <p>(14)10. avoid reclamation and manage dereclamation activities in accordance with CE – P12, and when reclamation is considered suitable in accordance with CE – P12, have particular regard to the matters listed in Policy 10(2) and (3) of the NZCPS, (15)11. require stock to be excluded from the coastal marine area, adjoining intertidal areas and other water bodies and riparian margins in the coastal environment, and</p> <p>12. provide for and encourage activities undertaken for the primary purpose of <u>enhancing coastal water quality, coastal habitats and ecosystems, customary fisheries, mahika kai and kaimoana activities,</u> restoring natural character, features, landscapes, or</p>		
--	--	--	--	--	--

			seascapes in accordance with [new] <u>CE – P1, CE – P3, CE – P4 and CE – P6</u>		
00226 Kāi Tahu ki Otago / Aukaha	00226.154	Support	<p>CE-M4</p> <p>Amend as follows, and make any further amendments necessary to address the issues of concern raised by this submission: Territorial authorities must prepare or amend and maintain their district plans to: (1) control the location, density and form of subdivision in the coastal environment (outside the coastal marine area),</p> <p>(2) control the location, scale and form of buildings and structures in the coastal environment (outside the coastal marine area),</p> <p>(3) control the location and scale of earthworks, <u>mining and vegetation planting, modification and removal in the coastal environment (outside the coastal marine area), while allowing for mahika kai activities,</u></p> <p>(4) <u>recognise and map statutory acknowledgement areas, tōpuni and nohoaka identified in the NTCSA 1998,</u></p> <p>...</p> <p>7) include provisions requiring the adoption of a precautionary approach to assessing the effects of activities in the coastal environment in accordance with IM – P15 where:</p> <p><u>(a) the activity may affect the functioning, resilience and health of coastal waters and coastal ecosystems,</u></p> <p><u>(b) the activity may affect areas of deteriorated water quality,</u></p> <p><u>(c) the activity may affect areas of coastal waters where mana whenua have a particular cultural</u></p>	Amendments sought improve consistency with the policies of the OPRPS and the requirements of the Ngāi Tahu Claims Settlement Act 1998.	Allow

			<p><u>interest,</u></p> <p><u>(d) the activity may affect customary fisheries, mahika kai or kaimoana activities,</u> (e) there is scientific uncertainty, or</p> <p>(f) there are potentially significant or irreversible adverse effects,</p> <p>(8) provide for walking access to the coastal marine area in accordance with Policy 19 of the NZCPS <u>CE – P8,</u></p> <p>(9) control vehicle access to the coastal marine area in accordance with Policy 20 of the NZCPS <u>CE – P8,</u></p> <p>(10) recognise takata <u>mana</u> whenua needs for papakāika, marae and associated developments within the coastal environment and make appropriate provision for them,</p> <p>(11) provide access to nationally and regionally significant surf breaks, and provide for and encourage activities undertaken for the primary purpose of <u>enhancing coastal water quality, coastal habitats and ecosystems, customary fisheries, mahika kai and kaimoana activities,</u> restoring natural character, features, or landscapes in accordance with [new] <u>CE – P1, CE – P3, CE – P4</u> and CE – P6.</p>		
00226 Kāi Tahu ki Otago / Aukaha	00226.155	Support	<p>CE-M5</p> <p>Amend as follows:</p> <p>Local authorities are encouraged to consider the use of other mechanisms or incentives to assist in achieving Policies CE – P2 CE – P1 to CE – P12 <u>CE – PX,</u> including: ... (8) research relevant to the effects of activities on:</p> <p><u>(a) coastal water quality,</u></p>	Amendments sought improve consistency with the policies of the OPRPS and the requirements of the Ngāi Tahu Claims Settlement Act 1998.	Allow

			<p><u>(b) coastal habitats and ecosystems,</u></p> <p><u>(c) the integrity, resilience and natural functioning of the coastal environment,</u></p> <p>(d) coastal network infrastructure,</p> <p>(e) coastal values,</p> <p>(f) coastal hazards,</p> <p>(g) riparian vegetation cover or any land cover that contributes to supporting coastal values or mitigating coastal hazards, or</p> <p>(h) areas particularly sensitive to land use changes,</p> <p>(9) facilitating the restoration, rehabilitation or creation of coastal habitats, particularly when it:</p> <p>(a) encourages the natural regeneration of indigenous species,</p> <p>(b) buffers or links ecosystems, habitats and areas of significance that contribute to ecological corridors, or</p> <p>(c) maintains or enhances the provision of indigenous ecosystem services,</p> <p><u>(d) will lead to the improvement of areas of deteriorated water quality, benefits mahika kai and kaimoana species or customary fisheries areas, and</u></p> <p>...</p>		
--	--	--	--	--	--

Te Rūnanga o Ngāi Tahu Further Submission: Schedule One

Part 2. Land and Freshwater

I support/oppose the submission of:	Original submission point number	Support OR Oppose	Relief sought	The reasons for my support/opposition are:	I seek that the whole (or part) of the submission be allowed (or disallowed):
Land and Freshwater					
00226 Kāi Tahu ki Otago / Aukaha	00226.007	Support	General: Retain the strong focus on Te Mana o te Wai and on sustaining the relationship of mana whenua with Wai Māori.	It is very important that the proposed RPS recognises Te Mana o te Wai and effectively integrates it with resource management in the region.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.012	Support	General: Support the provisions to protect remaining wetlands and reverse the degradation that has occurred.	Te Rūnanga o Ngāi Tahu considers the relief sought to be consistent with the needs and aspirations of Ngāi Tahu Whānui to protect and reverse degradation of wetlands.	Allow
00404 Strath Clyde Water Ltd, McArthur Ridge Investment Group Ltd & Mount Dunstan Estates Ltd	00404.001	Support in part	General: Amend to provide direction on how Otago's Land and water planning framework should provide for the needs of different primary sector producers, particularly on water allocation for consumptive uses in over allocated catchments.	Water over-allocation is a significant resource management issue for the Region and as such this topic would fit within the ambit of the RPS. However the NPSFM 2020 already provides strong direction on how these matters are to be	Allow in part

				<p>addressed in regional plans and any provisions added to the RPS would need to reflect that.</p> <p>The submission does not include specific relief so it is unclear what direction and detail the submitter envisages in the RPS.</p>	
00101 Toitū Te Whenua, Land Information New Zealand	00101.062	Support in part	<p>General:</p> <p>The definition of 'pollutant/waste' is unclear in relation to herbicide, address leeway for herbicide usage to treat aquatic pests (eg. lagarosiphon) Hessian is another control method used for aquatic weeds, also not mentioned anywhere and we need to ensure that it's use is not prohibited.</p>	It is important to allow for weed control methods which do not degrade the mauri of waterbodies. However, the provisions for managing the discharges of particular contaminants to belongs in a regional plan.	Allow in part
00101 Toitū Te Whenua, Land Information New Zealand	00101.063	Support	<p>General:</p> <p>The freshwater section does not talk much about prevention of new species getting into our waterways.</p>	New pests and the consequence of managing them (more use of toxic chemicals in waterways) can reduce ability to undertake mahika kai.	Allow
00223 Te Ao Marama	00223.004	Support	<p>General:</p> <p>Recognise that over-allocation is a significant issue of concern for mana whenua in the region, as identified in the earliest Regional Policy Statement for Otago.</p> <p>Provide further clarification within the pORPS provisions regarding management of over-allocation, both water quantity and water quality,</p>	Water over-allocation is a significant resource management issue for the Region and as such this topic would fit within the ambit of the RPS. However the NPSFM 2020 already provides strong direction on how these matters are to be addressed in regional plans	Allow

			including how to recognise over-allocation when limits have not been set in a freshwater management unit (FMU) or part of an FMU.	and any provisions added to the RPS would need to reflect that.	
00223 Te Ao Marama	00223.005	Support	General: Provide further clarification within the pORPS provisions regarding management of dams and weirs.	Dams and weirs require appropriate management. While commonly used at both small and large scale across Otago, the effects of dams and weirs can significantly degrade the mauri or health of water bodies. Consideration needs to be made as to what is included in the RPS to direct regional plans on the matter.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.008	Support	General: Amend provisions (as set out separately) to better reflect a holistic, integrated management approach.	An holistic and integrated management approach will assist the Council in discharging its duties under the RMA.	Allow
00403 McArthur Ridge Vineyard Ltd	00403.003	Support in part	General: Amend the RPS objectives and policies to better address the issues identified in SRMR – I5 by providing better direction on how the competing needs of freshwater reliant industries should be prioritised, especially in water short catchments	Water over-allocation is a significant resource management issue for the Region and as such this topic would fit within the ambit of the RPS. However the NPSFM 2020 already provides strong direction on how these matters are to be addressed in regional plans and any provisions added to	Allow in part

				the RPS would need to reflect that.	
00417 Kramer, Mark	00417.001	Oppose	General: Amend the RPS to clarify or recognise that suction dredging is an activity that will be carried out in the wet bed of some rivers, and that when considering effects, reasonable parameters are set, such as those in section 13.5.1.5 of the Regional Plan: Water for Otago	These activities require appropriate management. They can significantly degrade the mauri or health of water bodies. However, consideration needs to be made as to what is included in the RPS to direct regional plans on the matter and which are more appropriately addressed in the Land and Freshwater Plan.	Disallow
00213 Waitaki Irrigators Collective Limited	00213.007	Oppose	Remove references to rakatirataka.	Tino rakitirataka is a principle of Te Tiriti, guaranteed under Article 2 and which must be taken into account under Section 8 RMA.	Disallow
Federated Farmers 00239	00239.076	Oppose	LF – WAI – AER3 Insert new AER: “ <u>The management of land and water restores the balance between water, the wider environment, and the community</u> “	As a first priority the mauri or health of waterbodies must be protected. This is consistent with Te Mana o Te Wai as required by Policy 1 of the NPSFW. Placing the protection of the mauri and health of waterbodies first requires that the needs of the waterbody come first, and after that, if	Oppose

				appropriate, uses of the resource can then be considered. This is a different approach to balancing, and requires a clear delineation around what the waterbody needs to be healthy.	
00223 Te Ao Marama	00223.079	Support	LF – WAI – O1 Amend as follows: “ ... (4) water, land <u>and coastal waters</u> have a connectedness that supports and perpetuates life, ... ”	Te Rūnanga o Ngai Tahu considers that Te Mana o te Wai extends to coastal waters, consistent with Te Uta ki Tai.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.158	Support	LF-WAI-01 Amend as follows: The mauri of Otago’s water bodies and their health and well-being is protected ... and the management of land and water recognises and reflects that: ... (4) <u>freshwater</u> , and land <u>and coastal waters</u> have a connectedness that supports and perpetuates life ...	The relief sought makes it clear that Te Mana o te Wai encompasses freshwater, land, and coastal waters. Te Rūnanga o Ngai Tahu considers that Te Mana o te Wai extends to coastal waters, consistent with Te Uta ki Tai.	Allow
00231 Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.045	Support	LF-WAI-01 Amend as follows: ... (4) water and land have a connectedness that supports and perpetuates life, and (5) Kāi Tahu exercise rakatirataka, manaakitaka and their kaitiakitaka duty of care and attention	Te Rūnanga o Ngāi Tahu considers the relief sought to be consistent with the needs and aspirations of Ngāi Tahu Whānui because recreation and harvesting food (and mahika kai) are key aspects of wellbeing.	Allow

			Proposed Otago Regional Policy Statement 2021 Summary of Decisions Requested - Part A 412 over wai and all the life it supports, <u>and</u> <u>(6) people are enabled to use, enjoy and connect meaningfully with water bodies to further their amenity and well being, including through recreation and harvesting food</u>		
00206 Trojan Holdings Limited (Trojan)	00206.027	Oppose	LF-WAI-01 Amend as follows: The mauri of Otago's water bodies and their health and well-being is protected <u>maintained</u> , and restored where it is degraded, and the management of land and water recognises and reflects that...	The amendment does not give effect to the NPSFM 2020.	Disallow
00239 Federated Farmers of New Zealand	00239.069	Oppose	LF-WAI-01 Amend as follows: "The mauri of Otago's significant and highly – valued natural resources are identified and protected, or enhanced where water bodies and their health and well being is protected, and restored where it is degraded, and the management of land and water recognises and reflects that restores the balance between water, the wider environment, and the community, by recognising that: ..."	The amendment does not give effect to the NPSFM 2020.	Disallow
00235 OWRUG	00235.078	Oppose	LF-WAI-P1 Amend as follows: In all management of fresh water in Otago, prioritise:	While the submission retains the priority matter of the health and waterbodies, mana whenua involvement in upholding te hauora o te wai and hauora o te taiao must	Disallow

			<p>(1) first, the health and well-being of water bodies and freshwater ecosystems, te hauora o te wai and te hauora o te taiao, and the exercise of mana whenua to uphold these,</p> <p>second, the health and well-being needs of people, te hauora o te tangata; interacting with water through ingestion (such as drinking water and consuming harvested resources, immersive activities <u>including</u> harvesting resources and bathing), and ...</p>	be retained to implement the NPSFM2020. .	
00235 OWRUG	00235.080	Oppose	<p>LF-WAI- P3</p> <p>Amend as follows:</p> <p>Manage the use of fresh water and land in accordance with tikaka and kawa, using an integrated approach that: ...</p> <p><u>(3A) sustains food and fibre production to provide for the social, cultural, economic and health needs of the community ...</u></p> <p><u>(6A) has regard to the need to reduce emissions that contribute to climate change including enabling changes to activities that will contribute to emission reductions.</u></p>	<p>This amendment does not give effect to the NPSFM 2020. The health of waterbodies must be prioritised over other uses.</p> <p>What is required to sustain the health of the waterbody must first be established before other uses of the wai can be considered.</p>	Disallow
00306 Meridian Energy Limited	00306.032	Oppose	<p>LF – WAI – P3</p> <p>Amend as follows:</p> <p>“Manage the use of fresh water and land in accordance with tikaka and kawa, using an integrated approach that:</p> <p>(1) recognises and sustains the connections and interactions between water bodies (large and small,</p>	<p>This amendment does not give effect to the NPSFM 2020. T health of waterbodies must be prioritised over other uses.</p> <p>What is required to sustain the health of the waterbody must first be established</p>	Disallow

		<p>surface and ground, fresh and coastal, permanently flowing, intermittent and ephemeral), (2) sustains and, wherever possible practicable, restores the connections and interactions between land and water, from the mountains to the sea,</p> <p>(3) sustains and, wherever possible <u>practicable</u> , restores the habitats of mahika kai and indigenous species, including taoka species associated with the water body,</p> <p><u>(4) recognises that New Zealand's integrated response to climate change includes the management of freshwater;</u></p> <p><u>(5) recognises and provides for the national significance of developing, operating, maintaining and upgrading renewable electricity generation activities; and the benefits of renewable electricity generation in reducing greenhouse gas emissions and the associated effects of climate change.</u></p> <p><u>(6) recognises that the use of freshwater and land contributes to the economic and social wellbeing of people and communities.</u></p> <p>(7) manages the effects of the use and development of land to maintain or enhance the health and well – being of fresh water and coastal water,</p> <p>(8) encourages the coordination and sequencing of regional or urban growth to ensure it is sustainable,</p> <p>(9) has regard to foreseeable climate change risks, and</p> <p>(10) has regard to cumulative effects and the need to apply a precautionary approach where there is</p>	<p>before other uses of the wai can be considered.</p>	
--	--	--	--	--

			limited available information or uncertainty about potential adverse effects.”		
00226 Kāi Tahu ki Otago / Aukaha	00226.169	Support	<p>LF-VM-03</p> <p>Amend as follows:</p> <p>By 2050 <u>2045</u> in the North Otago FMU:</p> <p>(1) ...</p> <p>(4) ...</p> <p><u>(X) there is no further modification of the shape and behaviour of the water bodies and opportunities to restore the natural form and function of water bodies are promoted wherever possible.</u></p> <p>(5) land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact <u>and mahika kai species are safe for consumption,</u> and</p> <p><u>(Y) there are no direct discharges of wastewater to water bodies, and</u></p> <p>(6) <u>food production in the area is supported by innovative and sustainable land and water management practices</u> support food production in the area and that improve resilience to the effects of climate change.</p> <p>Also see submission on MAP1: If the Waikouaiti catchment is retained in the North Otago FMU, include recognition of management outcomes for the Waikouaiti freshwater mātaihai and the East Otago Taiāpure in the objective.</p>	The shorter deadline requiring the actions listed in the objective is appropriate and consistent with the NPSFM.	Allow

00226 Kāi Tahu ki Otago / Aukaha	00226.170	Support	<p>LF-VM-04</p> <p>Amend as follows:</p> <p>By 2050-2045 in the Taiari <u>Taiari</u> FMU:</p> <p>(1) ...</p> <p>(2) ...</p> <p><u>(X) water bodies support thriving mahika kai and Kāi Tahu whānui have access to mahika kai,</u></p> <p>(3) healthy wetlands are restored in the upper and lower catchment wetland complexes, including the Waipori/Waihola Wetlands <u>Waihola/Waipōuri wetland complex</u>, Tunaheketaka/Lake Taiari, scroll plain, and tussock areas,</p> <p>(4) the gravel bed of the lower Taiari <u>Taiari</u> is restored and sedimentation of the Waipori/Waihola <u>Waihola/Waipōuri wetland complex</u> is reduced,</p> <p><u>(Y) there is no further modification of the shape and behaviour of the water bodies and opportunities to restore the natural form and function of water bodies are promoted wherever possible, and</u></p> <p>(5) ...</p> <p>(6) water bodies support healthy populations of galaxiid species <u>and other indigenous species, including tuna,</u></p> <p><u>(Z) land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact and mahika kai species are safe for consumption,</u></p>	The amendments to the vision are appropriate and consistent with section 6(e) of the RMA.	Allow
----------------------------------	-----------	---------	---	---	-------

			<p>(7) ...</p> <p>(8) <u>food production in the area is supported by innovative and sustainable land and water management practices</u> support food production in the area and that improve resilience to the effects of climate change.</p>		
00223 Te Ao Marama	00223.086	Support	<p>LF-VM-06</p> <p>Amend to use phrasing consistent with the overarching vision for Te Mata – au where the same outcome is intended for the provision to help make it clear where distinct outcomes are sought for the Catlins, Te Ākau Tai Toka, due to the characteristics of this FMU. The provision in LF – VM – O2 that seeks to have no direct discharges of wastewater to waterbodies should be replicated in LF – VM – O6.</p>	The amendments will create consistency within the proposed RPS.	Allow
00137 Director-General of Conservation	00137.068	Support	<p>LF-VM-06</p> <p>- Amend all freshwater visions to provide a consistent and clear structure and to appropriately recognise the relevant values and issues in every FMU / rohe, provide appropriate timeframes and staged targets, and incorporate further specific relief as set out below.</p> <p>- Insert the following new clause or words to like effect:</p> <p><u>“x. indigenous species can migrate easily and as naturally as possible to and from the coastal environment.”</u></p>	The ability for indigenous species to migrate easily is consistent with RMA Section 6(c)	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.174	Support	LF-VM-P6	Relief sought provides for a consistent approach to the	Allow

			<p>Amend as follows:</p> <p>Where rohe have been defined within FMUs:</p> <p>(1) ...</p> <p>(2) ...</p> <p>(a) <u>must</u> set target attribute states that are no less stringent than the parent FMU environmental outcomes if the same attributes are adopted in both the rohe and the FMU ...</p>	implementation of the proposed RPS.	
00239 Federated Farmers of New Zealand	00239.082	Support in part	<p>LF-VM-M3</p> <p>Amend as follows:</p> <p>“(3) supporting community initiatives, <u>including water storage</u>, ...</p>	<p>Water storage is an important tool for climate change resilience, water use efficiency and restoring the mauri of awa affected by over-allocated run of river takes. However, like all activities it cannot be carte blanche, and adverse effects of water storage must be avoided, remedied or mitigated to the extent necessary to achieve the purpose of the RMA and give effect to the NPSFM. ITo that end, instream storage and use of artificial aquifer recharge as a means of irrigation water storage must be avoided.</p> <p>A policy along these lines is appropriate in the RPS with</p>	Allow in part

				more detailed provisions to manage water storage in appropriate regional plans.	
00226 Kāi Tahu ki Otago / Aukaha	00226.175	Support	<p>LF-VM-M3</p> <p>Amend as follows:</p> <p>Otago Regional Council must work with <u>Kāi Tahu</u> and communities to achieve the objectives and policies in this chapter, including by:</p> <p>(1) engaging with <u>Kāi Tahu</u> and communities to identify environmental outcomes for Otago's FMUs and rohe and the methods to achieve those outcomes ...</p>	Relief sought provides greater clarity to the understanding of the Method.	Allow
00223 Te Ao Marama	00223.094	Support	<p>LF-FW – General:</p> <ul style="list-style-type: none"> - Amend the provisions to better recognise the relationship of forestry with land and water management, including water quantity, erosion and competition with other land uses. <p>References to primary production need to separately differentiate forestry activities, particularly in relation to highly productive land.</p>	Amendment compliments those sought elsewhere in submissions and achieves integrated management as required by the RMA.	Allow
00223 Te Ao Marama	00223.095	Support	<p>LF-FW-General</p> <p>Improve connections within the provisions as they seek to manage activities governed by different sections of the RMA (ie S9, S13, S15).</p>	Relief sought is consistent with ensuring that different provisions and sections in the proposed RPS talk to each other.	Allow
00223 Te Ao Marama	00223.087	Support	<p>LF-VM-AER 3</p> <p>Amend as follows:</p> <p><u>"The fresh water visions in this section underpin Otago's planning framework enable implementation of Te Mana o te Wai according to the particular characteristics of freshwater management units and rohe, and the outcomes they seek are achieved"</u></p>	Relief sought provides further clarification to assist proposed RPS users.	Allow

			within the timeframes specified.”		
00137 Director-General of Conservation	00137.081	Support	<p>LF-FW-New provision</p> <p>Insert a new method as follows or words to like effect:</p> <p><u>“x. Local authorities must:</u></p> <p><u>1. establish a long term monitoring programme that incorporates cultural health monitoring;</u></p> <p><u>2. record information (including monitoring data) about the state of land and soils and the challenges to their health and well-being; and regularly prepare reports in the matters in (1) and (2) and publish those reports.”</u></p>	Long term monitoring will assist in the implementation of the proposed RPS.	Allow
00502 AWA	00502.008	Allow	<p>LF-FW-New AER</p> <p>Add new AER in LF – FW – AER section as follows:</p> <p><u>Fresh water is allocated within the limits in a way that will give effect to te Mana o te Wai, and that will deliver a balance of good social, cultural and environmental outcomes, including reduced GHG emissions.</u></p>	Te Rūnanga o Ngāi Tahu does not consider this a correct interpretation of Te Mana o te Wai which requires the water bodies be in a healthy state as a first priority before making provision for other uses.	Disallow
00226 Kāi Tahu ki Otago / Aukaha	00226.179	Support	<p>LF-FW-O8</p> <p>Amend as follows:</p> <p>In Otago’s water bodies and their catchments...</p> <p>(4) native fish can migrate easily and as naturally as possible and taoka species and their habitats are protected <u>and sustained</u>, ...</p>	It is very important that habitats of native fish are sustained as well as protected.	Allow
00235 OWRUG	00235.093	Oppose	<p>LF-FW-O8</p> <p>Amend as follows:</p>	This amendment deo snto give effect to the NPSFM 2020. Te Mana o te Wai	Disallow

			<p>In Otago's water bodies and their catchments:</p> <p>(1) the health of the wai supports the health of the people and thriving mahika kai, <u>and the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future,</u></p> <p>(2) <u>water flow is continuous throughout the whole system, where this is consistent with the natural system;</u></p> <p>Add following clause at (6)</p> <p><u>"sustainable and integrated water allocation and abstraction supports food and fibre production."</u></p>	requires the water bodies be in a healthy state as a first priority, before making provision for other uses.	
00226 Kāi Tahu ki Otago / Aukaha	00226.180	Support	<p>LF-FW-O9</p> <p>Amend as follows:</p> <p>Otago's natural wetlands are protected or restored so that: ...</p> <p>(3) there is no reduction in their ecosystem health, hydrological functioning, amenity values, extent or water quality, and <u>if these have been degraded,</u> they are improved, and</p> <p>(4) their flood attenuation <u>and water storage</u> capacity is maintained.</p>	The amendment sought is consistent with Policy 13 of the NPSFM.	Allow
0014 Highton, John	00014.054	Oppose	<p>LF-FW-P7</p> <p>Amend to include providing for valued introduced species and protecting their habitat and the need for migration to maintain healthy populations.</p>	There are times and places where it is not desirable for introduced fish species to be maintained.	Disallow

00226 Kāi Tahu ki Otago / Aukaha	00226.182	Support	<p>LF-FW-P7</p> <p>Amend as follows:</p> <p>Environmental outcomes, attribute states (including target attribute states) and limits ensure that: ...</p> <p>(2) the habitats of indigenous species associated with water bodies are protected <u>and sustained</u>, including by providing for fish passage,</p> <p>(6) <u>allocation of fresh water is allocated</u> within environmental limits and <u>water is used efficiently</u>.</p>	It is very important that habitats of native fish are sustained as well as the fish species being protected.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.184	Support	<p>LF-FW-P9</p> <p>Amend as follows:</p> <p>Protect natural wetlands by:</p> <p>(1) avoiding a reduction in their values or extent unless:</p> <p>(a) the loss of values or extent arises from: ...</p> <p>(vi) the maintenance of <u>or</u> operation of specific <u>specified</u> infrastructure, or other infrastructure ...</p>	The relief sought improves clarity.	Allow
00231 Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.056	Oppose	<p>LF-FW-P9</p> <p>Amend as follows:</p> <p>...</p> <p>the maintenance of operation of specific <u>specified</u> infrastructure, or other infrastructure,</p> <p>...</p> <p>the effects of the activity on indigenous biodiversity and <u>the habitat of trout and salmon</u> are managed by</p>	With wetlands there are instances when the requirements of indigenous biodiversity conflict with the provision of habitat for trout and salmon.	Disallow

			applying either ECO – P3, ECO – P6 or <u>ECO-P11</u> (whichever is applicable), and		
00231 Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.057	Oppose	<p>LF-FW-P10</p> <p>Amend as follows:</p> <p>...</p> <p>(1) an increase in the extent and quality of habitat for indigenous species,</p> <p><u>(1a) an increase in the extent and quality of habitat for trout and salmon, insofar as it is consistent with ECO-P11</u></p>	Te Rūnanga is concerned that the thrust of this amendment extends further than the requirements of section 6 of the RMA. Section 6 and other Part 2 matters are not managed in isolation, and section 6(e), 7(a) and 8 must not be compromised for the sake of an increase in trout and salmon habitat.	Disallow
00115 Oceana Gold (New Zealand) Ltd	00115.014	Oppose	<p>LF-FW-P13</p> <p>Amend this policy as follows:</p> <p>(1) avoiding the loss of values or extent of a river, unless:</p> <p>(a) ...</p> <p>(b) the effects of the activity are managed by applying:</p> <p>(i) for effects on indigenous biodiversity, either ECO – P3 or ECO – P6 (whichever is applicable), and</p> <p>(ii) for other effects, the effects management hierarchy,</p> <p>(2) ...</p> <p>(4) wherever possible, sustaining the form and function of a water body that reflects its natural behaviours,</p>	<p>The submitter seeks the deletion of clauses which are essential to achieve:</p> <ul style="list-style-type: none"> - appropriate cross references within the proposed RPS and integrated management - to protect waterbodies, which while not overtly stated includes the mauri of waterbodies. <p>Deletion is inconsistent with the implementation of Te Mana o Te Wai as required by the NPSFW.</p>	Disallow

			(5) ...		
00226 Kāi Tahu ki Otago / Aukaha	00226.187	Support	<p>LF-FW-P13</p> <p>Amend by including a new clause as follows:</p> <p><u>(X) maintaining or enhancing the values of riparian margins to support habitat and biodiversity, reduce sedimentation of water bodies and support improved functioning of catchment processes.</u></p>	Te Rūnanga o Ngāi Tahu considers that the relief sought supports the needs and aspirations of Ngāi Tahu Whānui.	Allow
00318 Contact Energy Limited	00318.015	Oppose	<p>LF-FW-P13</p> <p>Amend as follows:</p> <p>“Preserve the natural character of lakes and rivers and their beds and margins by:</p> <p>(1) avoiding the loss of values or extent of a river, unless:</p> <p>(a) there is a functional need for the activity in that location, and</p> <p>(b) the effects of the activity are managed by applying:</p> <p>(i) for effects on indigenous biodiversity, either ECO — P3 or ECO — P6 (whichever is applicable), and</p> <p>(ii) for other effects, the effects management hierarchy,</p> <p>(2) not granting resource consent for activities in (1) unless Otago Regional Council is satisfied that:</p> <p>(a) the application demonstrates how each</p>	While there will be situations where there is a functional need for infrastructure in certain locations, it does not achieve the purpose of the Act if adverse effects are not be avoided, remedied or mitigated.	Disallow

			<p>step of the effects management hierarchies in (1)(b) will be applied to the loss of values or extent of the river, and</p> <p>(b) any consent is granted subject to conditions that apply the effects management hierarchies in (1)(b),</p> <p>(3) establishing environmental flow and level regimes and water quality standards that support the health and well-being of the water body,</p> <p>(4) wherever possible, sustaining the form and function of a water body that reflects its natural behaviours,</p> <p>(45) recognising and implementing the restrictions in Water Conservation Orders,</p> <p>(56) preventing the impounding or control of the level of Lake Wanaka,</p> <p>(67) preventing modification that would reduce the braided character of a river, and</p> <p>(78) controlling the use of water and land that would adversely affect the natural character of the water body.”</p>		
00223 Te Ao Marama	00223.088	Support	<p>LF-FW-P14</p> <p>Amend as follows:</p> <p>“... (3) increase the presence, resilience and abundance of indigenous flora and fauna, including by providing for fish passage within river systems <u>and creating fish barriers to prevent predation where necessary</u>, ...”</p>	The decline of native fish is an issue throughout New Zealand, and it is important that the RPS provides for opportunities to exclude predatory introduced fish when the opportunity arises.	Allow

00231 Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.059	Oppose	<p>LF-FW-P14 Amend as follows:</p> <p>LF – FW – P14 – Restoring natural character <u>and instream values</u></p> <p>Where the natural character <u>or instream values</u> of lakes and rivers and their margins has been reduced or lost, promote <u>require</u> actions that:</p> <p>...</p> <p><u>(3a) restore the habitat of trout and salmon, insofar as it is consistent with ECO-P11,</u></p> <p><u>(4) improve water body margins by naturalising bank contours and establishing <u>habitat and indigenous vegetation</u> and habitat, and</u></p>	<p>Te Rūnanga is concerned that the thrust of this amendment extends further than the requirements of section 6 of the RMA. Section 6 and other Part matters are not managed in isolation, and section 6(e), 7(a) and 8 must not be compromised for the sake of an increase in trout and salmon habitat.</p>	Disallow
00226 Kāi Tahu ki Otago / Aukaha	00226.189	Support	<p>LF-FW-P15 Amend as follows:</p> <p>Minimise <u>Avoid</u> the adverse effects of direct, and indirect discharges of stormwater, and <u>wastewater and human wastes (including cremated ashes)</u> to fresh water by:</p> <p><u>(X) phasing out direct wastewater discharges to water, and</u></p> <p>(1) except as required by LF – VM – O2 and LF – VM – O4, preferring <u>requiring new</u> discharges of wastewater or other human wastes to be to land over discharges to water, unless adverse effects associated with a discharge to land are <u>demonstrably greater</u> than a discharge to water, and</p> <p>(2) requiring: ...</p> <p><u>(d) on – site wastewater systems and stormwater management to be designed and operated in accordance with best practice standards, ...</u></p>	<p>Te Rūnanga o Ngāi Tahu considers that the relief sought supports the needs and aspirations of Ngāi Tahu Whānui.</p>	Allow

00226 Kāi Tahu ki Otago / Aukaha	00226.190	Support	<p>LF – FW – M5</p> <p>Amend as follows:</p> <p>No later than 31 December 2023, Otago Regional Council must:</p> <p>(1) in partnership with Kāi Tahu, undertake a review based on existing information and develop a list of water bodies likely to contain outstanding values, including those water bodies listed in LF – VM – P6,</p> <p>(2) ...</p> <p><u>(X) in partnership with Kāi Tahu, identify Kāi Tahu cultural and spiritual values associated with the water bodies identified,</u></p> <p>(3) ...</p> <p>(4) map outstanding water bodies and identify their outstanding and significant values, as well as <u>Kāi Tahu cultural and spiritual values associated with the water bodies</u>, in the relevant regional plan(s), and</p> <p>(5) include provisions in regional plans to avoid the adverse effects of activities on the significant and outstanding values of outstanding water bodies <u>and on any Kāi Tahu cultural and spiritual values associated with the water bodies.</u></p>	Amendments assist in the delivery and implementation of the plan.	Allow
00020 Raynoir Matarki Forests	00020.012	Support in part	<p>LF – FW – M6</p> <p>Amend LF – FW – M6(5)(d) to make subject to the regulations of the NESPF prevailing.</p>	The NESPF does not trump other national policy documents including the NPSFM, nor the purpose of the RMA. The role of the NESPF and the relationship between it and other statutory documents needs to be considered in the RPS.	Allow in part

00213 Waitaki Irrigators Collective Limited	00213.021	Support in part	<p>LF-FW-M6</p> <p>Amend wording to read:</p> <p>...</p> <p>(6) provide for the off-stream storage of surface water where storage will...</p>	<p>Water storage is an important tool for climate change resilience, water use efficiency and restoring the mauri of awa affected by over-allocated run of river takes. However, like all activities it cannot be carte blanche, and adverse effects of water storage must be avoided, remedied or mitigated to the extent necessary to achieve the purpose of the RMA and give effect to the NPSFM. To that end, instream storage and use of artificial aquifer recharge as a means of irrigation water storage must be avoided.</p> <p>A policy along these lines is appropriate in the RPS with more detailed provisions to manage water storage in appropriate regional plans.</p>	Allow in part
00226 Kāi Tahu ki Otago / Aukaha	00226.191	Support	<p>LF-FW-M6</p> <p>Amend as follows:</p> <p>Otago Regional Council must publicly notify a Land and Water Regional Plan no later than 31 December 2023 and, after it is made operative, maintain that regional plan to:</p>	<p>The amendments sought provide greater clarity of drafting, and assist in the implementation of Te Mana o Te Wai.</p>	Allow

			<p>(1) ...</p> <p>(2) ...</p> <p>(3) identify water bodies that are over – allocated in terms of either their water quality or quantity,</p> <p>(4) include environmental flow and level regimes for water bodies (including groundwater) that give effect to Te Mana o te Wai, <u>support achievement of the vision for the Freshwater Management Unit set out in the LF – VM objectives</u> and provide for:</p> <p>(a) the <u>natural</u> behaviours of the water body including a base flow or level that provides for variability,</p> <p>(b) ...</p> <p>(c) ...</p> <p>(d) the hydrological connection with other water bodies, <u>wetlands</u>, estuaries and coastal margins,</p> <p>(e) ...</p> <p>(f) ...</p> <p>(5) include limits on resource use that <u>support achievement of the vision for the Freshwater Management Unit set out in the LF – VM objectives</u>:</p> <p>(a) differentiate between types of uses, including drinking water, and social, cultural and economic uses, in order to provide long-term certainty in relation to <u>about the availability of water for those uses of available water</u>,</p> <p>(b) for water bodies that have been identified as over – allocated, provide methods and timeframes for phasing out that over-allocation <u>within the timeframes required to achieve the vision for the Freshwater Management Unit set out in the LF – VM objectives</u>,</p>		
--	--	--	--	--	--

			(c) ... (d) ... (6) ... (7) ... (X) recognise and respond to Kāi Tahu cultural and spiritual concerns about mixing of water between different catchments, and ... (8) ...		
00239 Federated Farmers of New Zealand	00239.091	Support in part	LF-FW-M7 Amend as follows: “(6) provide for the off-stream and in-stream storage of surface water where storage will..... “	Water storage is an important tool for climate change resilience, water use efficiency and restoring the mauri of awa affected by over-allocated run of river takes. However, like all activities it cannot be carte blanche, and adverse effects of water storage must be avoided, remedied or mitigated to the extent necessary to achieve the purpose of the RMA and give effect to the NPSFM. To that end, instream storage and use of artificial aquifer recharge as a means of irrigation water storage must be avoided. A policy along these lines is appropriate in the RPS with more detailed provisions to	Allow in part

				manage water storage in appropriate regional plans.	
00223 Te Ao Marama	00223.091	Support	<p>LF – FW – AER10</p> <p>Amend as follows: <u>“Direct discharges of stormwater to water bodies are reduced across the region and the quality of stormwater discharges from existing urban areas is improved.”</u></p>	<p>AER10 measures improvements in the quality of stormwater discharge from urban areas. It is an important component of Council monitoring and should be retained with the amendments sought.</p>	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.192	Support	<p>LF – FW – M7</p> <p>Amend as follows:</p> <p>Territorial authorities must prepare or amend and maintain their district plans no later than 31 December</p> <p>2026 to:</p> <p>(1) map outstanding water bodies and identify their outstanding and significant values, <u>as well as any Kāi Tahu cultural and spiritual values associated with the water bodies,</u> using the information gathered by Otago Regional Council in LF – FW – M5, and</p> <p>(2) include provisions to avoid the adverse effects of activities on the significant and outstanding values of outstanding water bodies, <u>and on any Kāi Tahu cultural and spiritual values associated with the water bodies,</u></p> <p><u>(x) include provisions to preserve the natural character of lakes and rivers and their margins from the adverse effects of land use and development and activities on the surface of water, ...</u></p>	<p>The amendments sought will assist the Council in discharging its duties under Section 6(e) and 8 of the RMA.</p>	Allow

00226 Kāi Tahu ki Otago / Aukaha	00226.194	Support	<p>LF – FW – M9</p> <p>Add a new clause as follows:</p> <p><u>... and</u></p> <p><u>(4) take action where the results of monitoring show that this is necessary to achieve the objectives of this policy statement.</u></p>	Monitoring is essential to the implementation of the proposed RPS	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.196	Support	<p>LF – FW – E3</p> <p>Amend as follows:</p> <p>Paragraph 2, 3rd sentence:</p> <p>... This reflects the views of takata <u>mana</u> whenua and the community that fresh and coastal water, including wetlands, should be managed holistically and in a consistent way ...</p> <p>Paragraph 2, final sentence:</p> <p>... This is because of the importance of restoration to Kāi Tahu and in recognition of the historic loss of wetlands in Otago, <u>and the indigenous biodiversity values and hydrological values of wetland systems.</u></p> <p>Paragraph 3, 2nd sentence:</p> <p>... Additional water bodies can be identified if they are wholly or partly within an outstanding natural feature or landscape or if they meet the criteria in APP1 which lists the types of values which may be considered outstanding: cultural and spiritual, ecology, landscape, natural character, recreation and physical ...</p>	Amendments sought improve the clarity of the proposed RPS.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.197	Support	<p>LF – FW – PR3</p> <p>Amend as follows:</p> <p>Paragraph 1, final sentence:</p> <p>The legacy of Otago's historical mining privileges, coupled with contemporary <u>urban and rural</u> land</p>	Amendments sought improve the clarity of the proposed RPS.	Allow

			<p>uses, contribute to ongoing water quality and quantity issues in some water bodies, with significant cultural effects.</p> <p>Paragraph 3:</p> <p>This section of the LF chapter contains more specific direction on managing fresh water to give effect to Te Mana o te Wai and contributes to achieving the long-term freshwater visions for each FMU and rohe.</p> <p>It also reflects key direction in the NPSFM for managing the health and well-being of fresh water ...</p>		
00223 Te Ao Marama	00223.090	Support	<p>LF – FW – AER9</p> <p>Amend as follows: “The frequency of Direct discharges of wastewater to water bodies is are reduced across the region and no longer occurring in some places to support visions for water bodies.”</p>	The relief sought in combination with other requested change provides a comprehensive measure of environmental results.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.198	Support	<p>LF – FW – AER9</p> <p>Amend as follows:</p> <p>The Direct discharges of wastewater to water are <u>phased out and</u> frequency of wastewater overflows is reduced.</p>	The relief sought in combination with other requested changes provides a comprehensive measure of environmental results.	Allow
00223 Te Ao Marama	00223.091	Support	<p>Amend as follows:</p> <p>“Direct discharges of stormwater to water bodies are reduced across the region and the the quality of stormwater discharges from <u>existing</u> urban areas is improved.”</p>	The relief sought in combination with other requested change provides a comprehensive measure of environmental results.	Allow

00226 Kāi Tahu ki Otago / Aukaha	00226.199	Support	<p>LF – LS – O11</p> <p>Amend as follows: Replace use of “primary production” with reference to outdoor agricultural, pastoral and horticultural production or a defined term that clearly excludes mining, quarrying, forestry and production of commodities within buildings.</p>	Te Rūnanga o Ngāi Tahu considers that the relief sought supports the needs and aspirations of Ngāi Tahu Whānui.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.201	Support	<p>LF – LS – P16</p> <p>Amend as follows:</p> <p>Recognise that maintaining soil quality requires the Require integrated management of land and freshwater resources <u>including that recognises and respects</u> the interconnections between soil health, vegetative cover and water quality and quantity, <u>so that soil quality is maintained, and freshwater outcomes are able to be achieved.</u></p>	Improves clarity of the proposed RPS and integration with freshwater.	Allow
00021 Matakanui Gold Limited	00021.006	Oppose	<p>LF – LS – P19</p> <p>Amend to provide for mining, to recognise its functional and operational needs and clarify the relationship between mining and the land use of Highly Productive Land.</p>	Mining is a significant resource management issue for the Region; it has potential economic benefits, potentially significant environmental impacts, and restrictions in the location of where it can be undertaken. To that end, it is important that the RPS provides some guidance on how the activity needs to be managed, but the relief sought by the submitter does not achieve the purpose of the RMA or give effect to higher order planning documents.	Disallow

00115 Oceana Gold (New Zealand) Ltd	00115.017		<p>LF – LS – P19</p> <p>Amend this policy and/or insert new objectives and policies (preferable option) to specifically recognise the significance of mining in the Otago region and specifically the Macraes operation.</p> <p>Proposed policy wording could be based on policy 5.3.4 from the partially operative Otago RPS which says “Recognise the functional needs of mineral exploration, extraction and processing activities to locate where the resource exists.” Further, it needs to be recognised that ‘highly productive land’ means different things for different parts of the primary production sector.</p> <p>Similarly, climate suitability is not an important factor for mining. The policy therefore needs to recognise the land requirements for all primary production activities, not just a subset. For mining, highly productive land is that which holds the region’s best economically recoverable mineral resources, such as that around the Hyde Macraes Shear Zone. For these areas the policy needs to provide that that priority above all other uses of land is given to mining.</p>	<p>Mining is a significant resource management issue for the Region; it has potential economic benefits, potentially significant environmental impacts, and restrictions in the location of where it can be undertaken. To that end, it is important that the RPS provides some guidance on how the activity needs to be managed, but the relief sought by the submitter does not achieve the purpose of the RMA or give effect to higher order planning documents.</p>	Disallow
00226 Kāi Tahu ki Otago / Aukaha	00226.204	Support in part	<p>LF-LS-P19</p> <p>Amend as follows: Replace use of “primary production” with reference to outdoor agricultural, pastoral and horticultural production or a defined term that clearly excludes mining, quarrying, forestry and production of commodities within buildings.</p>	<p>The definition of primary production should marry with the intent of the plan provisions, but ought to marry with conventional understandings of the term wherever possible to avoid confusion. Primary production usually encompasses forestry</p>	Allow in part

				and viticulture as well as agriculture, horticulture and pastoralism. Usually it does not include mining and quarrying which are activities that extract a natural resource that already exists rather than growing or producing a product from using natural resources.	
00223 Te Ao Marama	00223.096	Support	LF-LS-20 Amend as follows: "Promote changes in land use and land management practices that improve support: (1) <u>implementation of Te Mana o te Wai and achievement of freshwater visions, including sustainability and efficiency of water use, ...</u> "	Improves integration of Te Mana o Te Wai throughout the proposed RPS.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.205	Support	LS-LF-P20 Amend as follows: Promote changes in land use or land management practices that improve: (1) the sustainability and efficiency of water use ...	The focus of the proposed amendment on sustainability is appropriate in the context of prioritising the health and mauri of wai. Efficiency is not a goal or end state, it is a measure of action.	Allow
00020 Raynoir Matarki Forests	00020.016	Oppose in part	LF-LS-M12 Delete LF – LS – M12(1)	M12 requires District Councils to manage the effects or new or spatially extended plantation forestry. The relationship between the NES and NPSRM needs to be considered further.	Allow in part
00226 Kāi Tahu ki Otago / Aukaha	00226.206	Support	LF – LS – P21 Amend as follows:	The amendments provide for an ecosystem-based approach by acknowledging	Allow

			<p>Achieve the improvement or maintenance of freshwater quantity, or quality, <u>and ecosystem values</u> to meet environmental outcomes set for Freshwater Management Units and/or rohe by:</p> <p>(1) ...</p> <p>(2) ..., <u>and</u></p> <p>(3) <u>managing riparian margins to maintain or enhance their habitat and biodiversity values, reduce sedimentation of water bodies and support improved functioning of catchment processes.</u></p>	that waterbodies do not exist in isolation.	
00226 Kāi Tahu ki Otago / Aukaha	00226.207	Support	<p>LF – LS – P22</p> <p>Amend as follows: Provide for public access to and along lakes and rivers by:</p> <p>(1) ...</p> <p>(2) seeking opportunities to enhance public access, including <u>access</u> by mana whenua in their role as kaitiaki and for gathering of mahika kai, and</p> <p>(3) encouraging landowners to only restrict access where it is necessary to protect: ...</p> <p>(f) places or areas of significance to takata whenua <u>Kāi Tahu</u>, including <u>wāhi tūpuna</u>, wāhi tapu and <u>wāhi tūpuna taoka</u>.</p>	The amendments sought would improve clarity and implementation of the proposed RPS.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.208	Support	<p>LF – LS – M11</p> <p>Amend as follows:</p> <p>(1) ...</p> <p>(a) the development and implementation of certified freshwater farm plans as required by the RMA and any regulations,</p> <p>...</p> <p>(2) provide for changes in land use that improve the sustainable and efficient allocation and use of and</p>	The amendments sought would improve clarity and implementation of the proposed RPS.	Allow

			<u>reduce demand on fresh water to give effect to objectives developed under the NPSFM, and ...</u>		
00206 Trojan Holdings Limited (Trojan)	00206.042	Support	<p>LS-LF-M12</p> <p>Amend as follows:</p> <p>(3) facilitate public access to, <u>and along the margin of,</u> lakes and rivers by:</p> <p>requiring the establishment of esplanade reserves and esplanade strips, and promoting the use of legal roads, including paper roads, <u>and any other means of public access rights, to that</u> connect with esplanade reserves and esplanade strips.</p>	Te Rūnanga o Ngāi Tahu considers that the relief sought supports the needs and aspirations of Ngāi Tahu Whānui.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.209	Support	<p>LS-LF-M12</p> <p>Amend as follows:</p> <p>Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to:</p> <p>(1) manage land use change by:</p> <p>(a) controlling the establishment of new or any spatial extension of existing plantation forestry activities <u>or carbon farming activities</u> where necessary to give effect to an objective developed under the NPSFM, and ...</p>	The effects of carbon farming need to be managed through district plans.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.212	Support	<p>LF-LS-E4</p> <p>Amend as follows:</p> <p>Paragraph 2:</p> <p>Managing soil resources, in particular, cannot be undertaken in isolation. The policies require managing the use and development of land and</p>	The amendments relate to explanatory text and assist in the understanding of provisions.	Allow

			<p>fresh water to maintain soil values, recognising that soil can be valued for more than its productive use and those values should be maintained. Soil erosion is problematic for <u>has adverse impacts on</u> both soil and water health. The policies provide direction on <u>for</u> managing erosion resulting from land use activities to, primarily, retain <u>ensure</u> soil is retained and <u>to</u> prevent its discharge to water.</p> <p>Paragraph 3, 1st sentence:</p> <p>Highly productive land is land used for primary agricultural, pastoral and horticultural production that provides economic and employment benefits ...</p> <p>Paragraph 4, 2nd sentence:</p> <p>... This is recognised in the policies which seek to promote changes in land use or management that improve efficient <u>sustainable</u> use of water, resilience to climate change and the health and quality of soil</p> <p>...</p> <p>Paragraph 5, 2nd sentence:</p> <p>... The policies in this section seek to maintain <u>existing public access opportunities</u> and where appropriate promote <u>enhanced</u> public access to and along lakes and rivers ...</p>		
00226 Kāi Tahu ki Otago / Aukaha	00226.213	Support in part	<p>LF-LS-PR4</p> <p>Amend as follows:</p> <p>Paragraph 2, 3rd sentence:</p> <p>... Otago's highest quality soils (in terms of suitability for primary agricultural, pastoral and horticultural production) are mainly on the Taieri Plain ...</p> <p>Add a final paragraph to read:</p>	The amendments improve the focus of the drafting which will assist in the implementation of the proposed RPS.	Allow

			<u>Riparian areas, in particular, play a key role in supporting the water quality and ecosystem values of water bodies, and it is important that this role is maintained.</u>		
--	--	--	---	--	--

Te Rūnanga o Ngāi Tahu Further Submission: Schedule One

Part 3: Ecosystems and Indigenous Biodiversity, Energy and Infrastructure, Hazards and Risks, Historical and Cultural Values

I support/oppose the submission of:	Original submission point number	Support OR Oppose	Relief sought	The reasons for my support/opposition are:	I seek that the whole (or part) of the submission be allowed (or disallowed):
Ecosystems and Indigenous Biodiversity					
00226 Kāi Tahu ki Otago / Aukaha	00226.020	Support	ECO – General Amend to recognise the fundamental nature of mahika kai and kaimoana activities as part of Kāi Tahu identity.	Mahika kai and kaimoana activities require healthy and flourishing ecosystems. Recognising and providing for them is part of the duty under s6(a) and 6(e) of the RMA.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.021	Support	ECO – General Amend to better reflect the kaitiaki role of mana whenua in relation to indigenous biodiversity, particularly in the methods.	Amendment sought is consistent with section 7(a) of the RMA.	Allow
00223 Te Ao Marama	00223.098	Support	ECO – General [Specific changes not identified] Improve clarity around the relationship with the Coastal Environment chapter.	Greater clarity around relationship with Coastal Environment will improve integrated management.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.214	Support	ECO – General Amend as follows:	Ecosystems in their entirety are valued by Kāi Tahu and recognising and providing for them is necessary to	Allow

			<u>The full range</u> of Otago's indigenous biodiversity is healthy and thriving and any decline in quality, quantity and diversity is halted.	discharge duties under s5(2)(b) and (c), and s6(e)	
00231 Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.075	Oppose	<p>New provision</p> <p><u>ECO-O4 – Trout and salmon</u></p> <p><u>The habitat of trout and salmon in Otago is protected and restored in a manner that is consistent with the protection of habitat of indigenous freshwater species.</u></p>	Te Rūnanga is concerned that the submission goes further than the direction provided in the RMA. Other Part II matters are also relevant and habitats of trout and salmon should not be protected and restored such that sections 6(e), 7(a) and 8 are fettered.	Disallow.
00231 Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.075	Oppose	<p><u>New provision</u></p> <p><u>ECO-P11 – Trout and Salmon</u></p> <p><u>The habitat of trout and salmon will be protected, including fish passage, and restored, insofar as this is consistent with the protection and restoration of habitat for indigenous species, including by:</u></p> <p><u>(1) using the method set out in ECO-M9 to identify water bodies, or parts of water bodies, where the protection and restoration of trout and salmon habitat is and isn't consistent with that of habitat for indigenous species,</u></p> <p><u>(2) in areas identified in (1) as being consistent: a. when considering consent applications, applying the biodiversity effects management hierarchy in ECO-P6 (1) – (5) to the habitat of trout and salmon, and b. consider the habitat of trout and salmon as part of the health, well-being and resilience of freshwater ecosystems, and</u></p>	Indigenous species and biodiversity must take precedence over Trout and Salmon. This is essential in ensuring native species and locations of mahika kai are not put at risk by exotic species. Duties in section 6 of the RMA have legal precedence over those in section 7.	Disallow

			<u>(3) when making decisions affecting areas identified in (1) as not being consistent, have particular regard to the recommendations of the Department of Conservation, the Fish and Game Council relevant to the area, Kāi Tahu, and species interaction management plans developed under ECO-M9.</u>		
00231 Otago Fish & Game Council and the Central South Island Fish & Game Council	00231.079	Oppose	<p>ECO-M9</p> <p>Amend as follows:</p> <p><u>ECO-M9 – Identifying and managing species interactions between trout and salmon and indigenous species</u></p> <p><u>Local authorities will engage with the Department of Conservation, the relevant Fish and Game Council and Kāi Tahu, as groups with statutory or cultural obligations to manage indigenous species and trout and salmon, to: (1) identify areas where the protection and restoration of trout and salmon habitat is consistent with that of the habitat of indigenous species, (2) identify areas where the protection and restoration of trout and salmon habitat is not consistent with that of the habitat of indigenous species, such that it requires management, and (3) for areas identified in (2), encourage the joint production a species interaction management plan, which will: a. determine information needs to manage the species, b. determine short, medium and long term objectives, c. determine appropriate management actions that support identified objectives and account for habitat needs, and d. use tools available within the Conservation Act 1987, where appropriate</u></p>	Indigenous species and biodiversity must take precedence over Trout and Salmon. This is essential in ensuring native species and locations of mahika kai are not put at risk by exotic species. Duties in section 6 of the RMA have legal precedence over those in section 7.	Disallow

00231 Otago Fish & Game Council and the Central South Island Fish & Game Council	00226.215	Support	ECO – O2 Amend by adding a definition of ‘occupancy’. Amend ECO – O2 as follows: A net increase in the extent and occupancy of Otago’s indigenous biodiversity results from restoration or <u>and</u> enhancement.	The amendment provides clarity to the drafting as restoration could mean that an area is restored to a previous level which was not thriving. Enhanced means that the state of the environment would be improved.	Allow
00223 Te Ao Marama	00223.099	Support	ECO – O2 Consider replacing the word ‘occupancy’ or otherwise providing clarity of meaning.	The amendment sought provides clarity to the drafting as restoration could mean that an area is restored to a previous level which was not thriving. Enhanced means that the state of the environment would be improved.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.216	Support	ECO – O3 Amend as follows: Mana whenua are recognised as <u>able to exercise their role as</u> kaitiaki of Otago’s indigenous biodiversity, and Otago’s communities are recognised as stewards, who are responsible for: ...	Te Rūnanga o Ngāi Tahu considers the relief sought is consistent with the specific needs and aspirations of kaitiaki rūnaka and better reflects the duties in s7(a) and s8.	Allow
00239 Federated Farmers of New Zealand	00239.099	Oppose	Delete ECO – P1(3)	These provisions are necessary to discharge the duties under s 5 and s6(e), and 7(a) of the RMA. Kaitiaki need to be able to access mahika kai.	Disallow

00226 Kāi Tahu ki Otago / Aukaha	00226.217	Support	<p>ECO – P1</p> <p>Amend as follows:</p> <p><u>Recognise the role of</u> Enable Kāi Tahu as to <u>exercise their role as</u> kaitiaki of Otago's indigenous biodiversity by:</p> <p>(1) involving Kāi Tahu in the management of indigenous biodiversity,</p> <p><u>working with Kāi Tahu in</u> the identification of indigenous species and ecosystems that are taoka, ...</p>	Relief sought is consistent with Section 7(a) of the RMA.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.218	Support	<p>ECO – P2</p> <p>Amend as follows:</p> <p>Identify:</p> <p>(1) the areas and <u>biodiversity</u> values of significant natural areas in accordance with APP2, and</p> <p><u>where appropriate</u>, indigenous species and ecosystems that are taoka in accordance with ECO – M3</p>	Relief sought improves clarity and implementation of proposed RPS.	Allow
00115 Oceana Gold (New Zealand) Ltd	00115.019	Oppose	<p>ECO – P3</p> <p>Delete (ECO – P3)</p>	Te Rūnanga o Ngāi Tahu considers that the relief sought by the submitter (and others who also seek deletion of ECO – P3) is not appropriate under Part 2 of the RMA, and does not support the needs and aspirations of Ngāi Tahu Whānui.	Disallow

00024 City Forests Limited	00024.005	Oppose in part	ECO – P3 Amend ECO – P3(3) to remove the precautionary approach with respect to Plantation Forestry and acknowledge the efficacy of the NES – PF for managing future uncertainties.	The relationship of the NES-PF and the roles and responsibilities of the Council under the RMA, particularly Part 2, require further consideration.	Disallow in part
00226 Kāi Tahu ki Otago / Aukaha	00226.219	Support	ECO – P3 Amend clause (1)(a) as follows: ...(a) any reduction of the area or <u>biodiversity</u> values ...	Amendment sought improves clarity by specifying biodiversity values.	Allow
00223 Te Ao Marama	00223.100	Support	ECO – P3 Amend as follows: “ ... (1) <u>first</u> avoiding ...”	Amendment sought clarifies the priority matter.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.220	Support	ECO – P4 Amend as follows: ECO – P4 – Provision for new activities <u>in significant natural areas and taoka</u> Insert new clause 2 as follows: <u>...(2) the sustainable use of mahika kai and kaimoana by mana whenua, ...</u> Amend to clarify that ‘Māori land’ in ECO – P4 applies to land in native reserves and that held under Te Ture Whenua Māori Act 1993. Change the reference in clause 3 from ‘takata whenua’ to ‘mana whenua’.	These provisions are necessary to discharge the duties under s 5 and s6(e), and 7(a) of the RMA. Kaitiaki need to be able to access mahika kai.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.221	Support	ECO – P5 Amend as follows:	Amendment sought will assist the Council in discharging	Allow

			ECO – P5 – Existing activities in significant natural areas <u>and taoka</u> ... Amend to clarify the date at which the policy takes effect.	duties under Section 6(e) of the RMA.	
00226 Kāi Tahu ki Otago / Aukaha	00226.222	Support	ECO – P6 Amend by adding new clause 6 as follows: ... <u>(6) In assessing adverse effects in the implementation of this policy, have particular regard to:</u> <u>(a) mahika kai practices of mana whenua, and the potential of land and resources held within native reserves and land held under Te Ture Whenua Māori Act 1993 to provide for the social, cultural and economic wellbeing of Māori.</u>	These provisions are necessary to discharge the duties under s 5 and s6(e), and 7(a) of the RMA.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.223	Support	ECO – P7 Amend to integrate management of indigenous biodiversity and ecosystems in the coastal environment into the ECO chapter and to address other matters of clarity raised here.	Amendment sought assists in achieving integrated management as required by the RMA.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.224	Support	d ECO – P8Amend as follows: ECO – P8: <u>Restoration and Enhancement</u> Amend by adding a definition of ‘occupancy’.	A new definition of ‘occupancy’ would be a helpful addition to the RPS.	Allow
00024 City Forests Limited	00024.012	Support in part	ECO – P9 Amend to exempt increased buffer zones around SNAs beyond those already enacted in the NES – PF without clear scientific evidence of their efficacy.	The tools used to protect SNAs need to be appropriate to the needs of each site and area. To that end neither the NES-PF provisions or an arbitrary approach of	Allow in part

				<p>increasing buffer zones may be appropriate. A much more considered approach is needed to resource management.</p> <p>The relationship of the NES-PF and the roles and responsibilities of the Council under the RMA, particularly Part II, require further consideration.</p>	
00226 Kāi Tahu ki Otago / Aukaha	00226.225	Support	<p>ECO – P9</p> <p>Amend as follows:</p> <p>...(a) areas identified as significant natural areas <u>or ecosystems that are taoka</u>, and</p> <p>(b) buffer zones adjacent to significant natural areas <u>or ecosystems that are taoka</u> where it is necessary to protect the significant natural area <u>or ecosystem that is taoka</u>, and...</p>	<p>Amendments sought assist in achieving Part II of the RMA particularly Section 6(e).</p>	Allow
00020 Raynoir Matarki Forests	00020.021	Oppose in part	<p>ECO – P9</p> <p>Amend as follows: (1) avoiding afforestation and replanting of plantation forests with wilding conifer species listed in APP5 within: (a) areas identified as significant natural areas, and (b) buffer zones adjacent to significant natural areas where it is necessary to protect the significant natural area, and <u>any forests, shelter belts and amenity planting, and</u></p>	<p>The tools used to protect SNAs need to be appropriate to the needs of each site and area. To that end neither the NES-PF provisions or an arbitrary approach of increasing buffer zones may be appropriate. A much more considered approach is needed to resource management.</p>	Allow in part

				The relationship of the NES-PF and the roles and responsibilities of the Council under the RMA, particularly Part II, require further consideration.	
00226 Kāi Tahu ki Otago / Aukaha	00226.226	Support	<p>ECO – P10</p> <p>Amend ECO – P10 or add additional policies to address the matters for clarification raised in this submission.</p> <p>Amend ECO – P10 as follows:</p> <p>...(2) recognises the interactions ki uta ki tai (from the mountains to the sea) between the terrestrial environment, fresh water, and the coastal marine area, including:</p> <p>(a) the migration of fish species between fresh and coastal waters, and <u>the effects of land – based activities on coastal ecosystems, for example from sedimentation or contaminant flows.</u></p>	The amendments sought are focussed toward integrated management which is required by section 59 of the RMA.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.228	Support	<p>ECO – M2</p> <p>Amend to clarify the reason for prioritisation of areas in clause 5.</p> <p>Amend to clarify whether the method covers identification of SNAs in the coastal environment.</p> <p>Amend as follows:</p> <p>...(1) in accordance with the statement of responsibilities in ECO – M1, identify the areas and</p>	Amendments sought provide greater clarity for plan users.	Allow

			<p><u>biodiversity</u> values of significant natural areas as required by ECO – P2, and</p> <p>(2) map the areas and include the <u>biodiversity</u> values identified under (1) in the relevant regional and district plans, ...</p>		
00226 Kāi Tahu ki Otago / Aukaha	00226.230	Support	<p>ECO – M4</p> <p>Amend by inserting new clause 2 as follow:</p> <p><u>(2) control the clearance or modification of indigenous vegetation, while allowing for mahika kai and kaimoana activities,</u></p>	<p>These provisions are necessary to discharge the duties under s 5 and s6(e), and 7(a) of the RMA.</p> <p>It is appropriate at a Regional Policy level to signal that Kāi Tahu as mana whenua will have access to mahika kai and kaimoana.</p>	Allow
00024 City Forests Limited	00024.013	Oppose in part	<p>ECO – M6</p> <p>Amend ECO – M5(6) to exempt increased buffer zones around SNAs beyond those already enacted in the NES – PF without clear scientific evidence of their efficacy.</p>	<p>The tools used to protect SNAs need to be appropriate to the needs of each site and area. To that end neither the NES-PF provisions or an arbitrary approach of increasing buffer zones may be appropriate. A much more considered approach is needed to resource management.</p> <p>The relationship of the NES-PF and the roles and responsibilities of the Council under the RMA, particularly Part II, require further consideration.</p>	Disallow in part

00226 Kāi Tahu ki Otago / Aukaha	00226.231	Support	<p>ECO – M5</p> <p>Amend as follows:</p> <p>... (2) control the clearance or modification of indigenous vegetation, <u>while allowing for mahika kai activities.</u></p> <p>(3) promote the establishment of esplanade reserves and esplanade strips, particularly where they would support ecological corridors, buffering or connectivity between significant natural areas, <u>or access to mahika kai.</u>...</p> <p>(6) prohibit the planting of wilding conifer species listed in APP5 within <u>or adjacent to</u> areas identified as significant natural areas <u>or ecosystems that are taoka.</u></p>	<p>These provisions are necessary to discharge the duties under s 5 and s6(e), and 7(a) of the RMA.</p> <p>It is appropriate at a Regional Policy level to signal that Kāi Tahu as mana whenua will have access to mahika kai.</p>	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.232	Support	<p>ECO – M6</p> <p>Amend or add new method to clarify the Kāi Tahu partnership role in the management of indigenous biodiversity, particularly mahika kai and taoka species and ecosystems, and also in relation to supporting the use of mātauraka in management and monitoring.</p>	<p>These provisions are necessary to discharge the duties under s 5 and s6(e), and 7(a) of the RMA.</p> <p>It is appropriate at a Regional Policy level to signal that Kāi Tahu as mana whenua will have access to mahika kai.</p>	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.233	Support	<p>ECO – M7</p> <p>Amend as follows:</p> <p>...(1) establish long-term monitoring programmes for areas identified under ECO – P4P2 that measure the net loss and gain of indigenous biodiversity,</p>	<p>Relief sought will assist in implementation of the proposed RPS, consistent with RMA Part II particularly section 6(e) 7(a).</p>	Allow

			(2) record information (including data) <u>over time</u> about the state of species, vegetation types and ecosystems, <u>including mahika kai species and ecosystems</u>		
00226 Kāi Tahu ki Otago / Aukaha	00226.234	Support	ECO – M8 Amend as follows: ...(1) providing information and guidance on the maintenance, restoration and enhancement of indigenous ecosystems and habitats, <u>including taoka and mahika kai species and ecosystems</u> , ... (7) gathering information on indigenous ecosystems and habitats, including outside significant natural areas <u>and including taoka and mahika kai species and ecosystems</u> .	Relief sought will assist in implementation of the proposed RPS, consistent with RMA Part II particularly section 6(e) 7(a).	Allow
00024 City Forests Limited	00024.005	Oppose in part	ECO – P3 Amend ECO – P3(3) to remove the precautionary approach with respect to Plantation Forestry and acknowledge the efficacy of the NES – PF for managing future uncertainties.	The relationship of the NES-PF and the roles and responsibilities of the Council under the RMA, particularly Part II, require further consideration.	Disallow in part
00321 New Zealand Infrastructure Commission	00321.022	Oppose	ECO – P4 Amend as follows: Provide for a broad carve out for infrastructure is needed to access the effects management hierarchy (ECO – P4). AND There is also a need to rationalise and reconcile the many similar policies that apply to the management	While infrastructure may in some instances have a functional need to locate in certain places, this should not mean that the management of adverse effects does not need to occur.	Disallow

			of effects from infrastructure, and/or clarify which takes precedence.		
Energy Infrastructure and Transport					
00226 Kāi Tahu ki Otago / Aukaha	00226.235	Support	EIT – EN – O2 Amend to address the matter for clarification raised. The reference to ‘environmental limits’ lacks clarity and is not addressed in the policies.	Relief sought improves clarity of the proposed RPS.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.237	Support	EIT – EN – M1 Amend to address the matters for clarification raised. • Clause 3(a) and the policies do not provide any guidance on how adverse effects should be managed or whether these areas should be avoided as a priority The reference to ‘within the environmental limits’ in clause 4 is unclear	Relief sought improves clarity of the proposed RPS.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.238	Support	EIT – EN – M2 Amend to address the matter for clarification raised. Clause 3(a), (b) and the policies do not provide any guidance on how adverse effects should be managed or whether these areas should be avoided as a priority.	Relief sought improves clarity of the proposed RPS.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.239	Support	EIT – INF – O4 Amend to address the matters for clarification raised. It is unclear what the environmental limits referred to are, or what the environmental outcomes for	Relief sought improves clarity of the proposed RPS.	Allow

			infrastructure are for infrastructure not covered by EIT – INF – O5.		
00226 Kāi Tahu ki Otago / Aukaha	00226.240	Support	<p>EIT – INF – O5</p> <p>Amend to address the matters for clarification raised.</p> <p>The outcome sought by this objective is unclear and it reads as a policy. There is also a lack of clarity around what minimising adverse effects means as part of an objective.</p>	Relief sought improves clarity of the proposed RPS.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.241	Support	<p>EIT – INF – P13</p> <p>Amend to clarify how new infrastructure in the coastal environment will be managed.</p> <p>Amend clause 1 as follows:</p> <p>(g) <u>wāhi tūpuna</u>, wāhi tapu, wāhi taoka, and areas with protected customary rights, and ...</p> <p>Amend clause 2 by adding new subclause iv and v as follows:</p> <p>(iv) <u>in wāhi tūpuna, in accordance with HCV – WT – P2, in outstanding natural features and landscapes, in accordance with NFL – P2,</u></p>	Relief sought improves clarity of the proposed RPS and will assist in implementation of the proposed RPS.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.242	Support	<p>EIT – INF – P14</p> <p>Amend to expand the range of sensitive activities, including those suggested by this submission.</p>	Relief sought improves clarity of the proposed RPS and will assist in implementation.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.243	Support	<p>EIT – INF – P16</p> <p>Amend clause 5 as follows:</p>	Adverse effects on wāhi tupuna should be avoided consistent with Section 6(e), 7(a) and 8 of the RMA.	Allow

			(5) minimising the adverse effects of the electricity transmission network on urban amenity, and avoiding adverse effects on town centres, <u>areas of significance to mana whenua such as wāhi tūpuna</u> , areas of high amenity or recreational value and existing sensitive activities.		
00226 Kāi Tahu ki Otago / Aukaha	00226.244	Support	EIT – INF – M4 Amend to address the matters for clarification raised. Clause 1 does not provide any guidance on how adverse effects should be managed or whether these areas should be avoided as a priority.	Relief sought provides clarity for plan users and will assist in implementation.	Allow
00223 Te Ao Marama	00223.101	Support	EIT – General Retain the aspects of this chapter that support climate change response.	Relief sought assists in implementing 7(i) of the RMA.	Allow
00223 Te Ao Marama	00223.102	Support	EIT – EN – O1 Consider combining EIT – EN – O1 and EIT – EN – O2	Relief sought assists with interpretation of the proposed RPS.	Allow
00223 Te Ao Marama	00223.104	Support	EIT – EN – P3 Consider deleting the word ‘appropriate’	Relief sought assists with interpretation of the proposed RPS.	Allow
00223 Te Ao Marama	00223.105	Support	EIT – EN – P4 [Specific changes not identified] Consider how an effects management hierarchy could assist to understand and implement EIT – EN – P4	Relief sought assists with interpretation of the proposed RPS.	Allow

00223 Te Ao Marama	00223.106	Support	EIT – EN – M1 Remove the word ‘the’ ahead of the phrase ‘environmental limits’ in sub – clause (4).	Relief sought assists with interpretation of the proposed RPS.	Allow
00223 Te Ao Marama	00223.108	Support	EIT – INF – General Ensure there are no gaps or inconsistencies between the way infrastructure is management between this chapter and the Coastal Environment chapter.	Relief sought supports achievement of integrated management consistent with section 59 of the RMA.	Allow
00223 Te Ao Marama	00223.107	Support	EIT – INF – P11 Consider how an effects management hierarchy could assist to understand and implement EIT – INF – P11	Relief sought assists in implementation of the proposed RPS.	Allow
00223 Te Ao Marama	00223.109	Support	EIT – INF – P13 Amend as follows: “...(1)(g) <u>wāhi tūpuna</u> , wāhi tapu and wāhi taoka, and areas with protected customary rights ...” Establish an effects management hierarchy in EIT – INF – P13 sub – clause (2)	Relief sought assists in implementation of the proposed RPS.	Allow
00223 Te Ao Marama	00223.112	Support	EIT – TRAN – General Retain the aspects of this chapter that support climate change response. Consider the value of employing an effects management hierarchy in this chapter.	Relief sought assists in achieving section 7(i) of the RMA.	Allow
00223 Te Ao Marama	00223.110	Support	EIT – INF – M4	Relief sought assists in achieving clarity and	Allow

			Amend EIT – INF – M4(2) to reference an effects management hierarchy	interpretation of proposed RPS.	
00226 Kāi Tahu ki Otago / Aukaha	00226.245	Support	<p>EIT – INF – M5</p> <p>Amend to address the matters for clarification raised.</p> <ul style="list-style-type: none"> • Clause 5 does not provide any guidance on how adverse effects should be managed or whether these areas should be avoided as a priority, • There should be management of adverse effects within, and a priority to avoid where possible, infrastructure in the margins of water bodies and the coast, <p>Clarity is sought over the intent of clause 6 – whether this is intended to avoid all development in areas that cannot be served by infrastructure. Kā Rūnaka oppose this intent given the location of marae and whānau housing in non – reticulated areas.</p>	Relief sought assists in achieving clarity and interpretation of proposed RPS.	Allow
00223 Te Ao Marama	00223.111	Support	<p>EIT – INF – M5</p> <p>Amend EIT – INF – M5(7) to reference an effects management hierarchy</p>	Relief sought assists in achieving clarity and interpretation of proposed RPS.	Allow
Hazards and Risks					
00223 Te Ao Marama	00223.118	Support	<p>General</p> <p>Retain the aspects of this chapter that support climate change response.</p>	Relief sought is consistent with section 7(i) of the RMA.	Allow

00226 Kāi Tahu ki Otago / Aukaha	00226.251	Support	HAZ – NH – P4 Amend clause (2) to apply a similar hierarchy to that used in HAZ – NH – P3 for new activities, i.e., restrict activities that could result in the risk or vulnerability becoming significant.	Amendment sought provides clarity to the policy.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.254	Support	HAZ – NH – P7 Amend as follows: Prioritise risk management approaches that reduce the need for hard protection structures or similar engineering interventions, and provide for hard protection structures only when: ... (4) the adverse effects of the hard protection structures <u>on natural processes, indigenous ecosystems and Kāi Tahu values</u> can be adequately managed ...	Relief sought provides clarity of drafting and links with the first part of the policy.	Allow
00223 Te Ao Marama	00223.115	Support	HAZ – NH – P7 Amend to include the word ‘and’ after sub – clauses (1) to (4) to assist in clarifying the intention of the word ‘or’ after sub – clause (5) OR use a structure as described below to improve clarity: “Prioritise risk management approaches ..., and provide for hard protection structures only when : <u>(1) only when</u> : (1) (a) hard protection structures are essential ...; <u>and</u> (2) (b) there are no reasonable alternatives ...; <u>and</u>	Relief sought assists in clarity and interpretation of proposed RPS.	Allow

			<p>(3) (c) hard protection structures would not result; <u>and</u></p> <p>(4) (d) the adverse effects ...; and</p> <p>(5) (e) the mitigation is viable; or</p> <p>(2) when the hard protection structure protects a lifeline utility ...”</p>		
00226 Kāi Tahu ki Otago / Aukaha	00226.258	Support	<p>HAZ – NH – P11</p> <p>Amend as follows:</p> <p>Recognise the <u>rakatirataka</u> role of Kāi Tahu as <u>kaitiaki</u> over wāhi tūpuna, Māori reserves and freehold land that is susceptible to natural hazards <u>and enable mana whenua to exercise kaitiakitaka</u> by involving <u>mana whenua</u> <u>them</u> in decision making and management processes.</p>	These amendments are appropriate to discharge the duty under s8 of the RMA. Tino Rakatirataka is a principle of Te Tiriti. It is appropriate for rakatirataka to be recognised over wāhi tupuna and in turn, for Kāi Tahu to be able to exercise kaitiakitaka in decision making and management processes.	Allow
00121 Ravensdown Limited	00121.086	Oppose	<p>HAZ – NH – M2</p> <p>Amend as follows:</p> <p>Local authorities must:</p> <p>...</p> <p>(4) prepare or amend and maintain their regional or district plans to take into account the effects of climate change by:</p> <p>(a) using the best relevant climate change data and projections to 2115,</p>	Te Rūnanga o Ngāi Tahu considers it is inappropriate to remove reference to a precautionary approach in Method 2.	Disallow

			(b) taking a precautionary approach when assessing and managing the effects of climate change where there is scientific uncertainty and potentially significant or irreversible effects, (c) ...		
00223 Te Ao Marama	00223.116	Support	HAZ – NH – E1 Clarify what is intended in relation to dams and weirs that are considered hard protection structures within the Explanation and/or Principal Reasons section(s).	Relief sought provides clarity and assists interpretation of the proposed RPS.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.264	Support	HAZ – CL – O3 Amend as follows: Contaminated land and waste materials are managed to protect human health, mana whenua <u>Kāi Tahu</u> values and the environment in Otago.	Supports consistency with reference elsewhere in the proposed RPS.	Allow
00223 Te Ao Marama	00223.119	Support	HAZ – CL – P14 Recognise that risks associated with natural hazard events, as identified in HAZ – CL – P18, are also present for closed landfills that are referenced in HAZ – CL – P14, with climate change increasing those risks for some closed landfills (eg adjacent to rivers, in flood plains or in the coastal environment) such that amendment of provisions is required to recognise and manage this risk.	Natural hazard risks, particularly in relation to climate change are a relevant consideration in managing landfills.	Allow
00510 Z Energy Limited, BP Oil NZ Limited, Mobil Oil NZ Limited	00510.061	Oppose	HAZ – CL – P14 Amend as follows: Actively Manage contaminated or potentially contaminated land so that it does not pose an	Te Rūnanga o Ngāi Tahu considers it is inappropriate to remove reference to active management and avoiding effects of contaminants on	Disallow

			<p>unacceptable risk to people and the environment, by:</p> <ol style="list-style-type: none"> 1. assessing and, if required, monitoring contaminant levels and environmental risks, 2. protecting human health in accordance with regulatory requirements, 3. avoiding, as the first priority, and only where avoidance is not practicable, mitigating or remediating adverse effects of the contaminants on the environment, and 4. requiring closed landfills to be managed in accordance with a closure plan that sets out monitoring requirements and, where necessary, any remedial actions required to address ongoing risks. 	the environment from Policy 14.	
00226 Kāi Tahu ki Otago / Aukaha	00226.267	Support	<p>HAZ – CL – P15</p> <p>Amend as follows: Avoid the creation of new contaminated land or, where this is not practicable, minimise adverse effects on the environment and mana whenua Kāi Tahu values.</p>	Supports consistency with other parts of the proposed RPS.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.270	Support	<p>HAZ – CL – P18</p> <p>Amend as follows:</p> <p>When providing for the development of facilities and services for the storage, recycling, recovery, treatment and disposal of waste materials:</p> <p>(1) avoid adverse effects on the health and safety of people,</p> <p><u>(X) avoid adverse effects of waste treatment and disposal on Kāi Tahu values, and avoid location of</u></p>	Consistent with Section 6(e) of the RMA	Allow

			<p><u>new waste treatment and disposal facilities in or near wāhi tūpuna.</u></p> <p>(2) minimise the potential for adverse effects on the environment to occur, ...</p>		
Historical and Cultural Values					
00239 Federated Farmers of New Zealand	00239.1 48	Amend	<p>General</p> <p>Amend the chapter so the focus is on protection from inappropriate subdivision, use and development as per HCV – WT – E1.</p>	<p>The chapter as notified includes protection of Kāi Tahu values where adverse effects must be avoided. This is appropriate and consistent with sections 6(e), 7(a) and 8 of the RMA.</p> <p>The duty under s6(e) is not limited to ‘inappropriate subdivision use or development.’</p>	Disallow
00239 Federated Farmers of New Zealand	00239.2 03	Amend	<p>General</p> <p>Amend provisions within the chapter to ensure a focus on maintenance rather than avoidance and protection.</p>	<p>The relief sought does not discharge the duties under Part II of the RMA, particularly section 6(e), 7(a) and 8.</p>	Disallow
00226 Kāi Tahu ki Otago / Aukaha	00226.2 77	Amend	<p>HCV – WT – P1</p> <p>Amend as follows:</p> <p><u>Recognise and provide for the enduring Kāi Tahu relationships with wāhi tūpuna</u> are sustained, including by:</p>	<p>The amendments sought will assist the Council in discharging its duties under Part II of the Act.</p> <p>Te Rūnanga o Ngāi Tahu supports the concept of wāhi tūpuna.</p>	Allow

			<p>(1) <u>recognising that Kāi Tahu hold an ancestral and enduring relationship with all whenua, wai māori and coastal waters within their takiwā,</u></p> <p>(2) <u>enabling Kāi Tahu to identify identifying as wāhi tūpuna any sites and areas of significance to mana whenua, where appropriate, along with the cultural values that contribute to each wāhi tūpuna being significant,</u></p> <p>(3) recognising the rakatirataka of mana whenua over wāhi tūpuna and providing for their ability to exercise kaitiakitaka their role as kaitiaki within these areas,</p> <p>(4) recognising and providing for connections and associations between different wāhi tūpuna, and</p> <p>(5) recognising and using traditional place names</p>		
00226 Kāi Tahu ki Otago / Aukaha	00226.2 78	Amend	<p>HCV – WT – P2</p> <p>Amend as follows:</p> <p>Wāhi tūpuna are protected by:</p> <p><u>(1) avoiding significant adverse effects on the cultural values of identified wāhi tūpuna,</u></p> <p><u>(2) where other adverse effects demonstrably cannot be completely avoided, then either remedying or mitigating adverse effects in a manner that maintains the values of the wāhi tūpuna,</u></p> <p><u>(3) enabling Kāi Tahu to manage wāhi tūpuna in accordance with tikaka Māori,</u></p> <p><u>Proposed Otago Regional Policy Statement 2021 Summary of Decisions Requested - Part A 693</u></p>	<p>The amendments sought will assist the Council in discharging its duties under Part II of the Act.</p> <p>Te Rūnanga o Ngāi Tahu supports the concept of wāhi tupuna.</p>	Allow

			<p><u>(4) avoiding any activities that are inappropriate in wāhi tūpuna as identified by Kāi Tahu, and</u></p> <p><u>(5) enhancing access to wāhi tūpuna to the extent compatible with the cultural values of the wāhi tūpuna.</u></p> <p>1. avoiding significant adverse effects on the cultural values associated with identified wāhi tūpuna,</p> <p>2. where adverse effects demonstrably cannot be completely avoided, remedying or mitigating adverse effects in a manner</p> <p>that maintains the values of the wāhi tūpuna,</p> <p>3. managing identified wāhi tūpuna in accordance with tikaka Māori,</p> <p>4. avoiding any activities that may be considered inappropriate in wāhi tūpuna as identified by Kāi Tahu, and</p> <p>5. encouraging the enhancement of access to wāhi tūpuna to the extent compatible with the particular wāhi tūpuna.</p>		
00314 Transpower	00314.045	Amend	<p>HCV – WT – P2</p> <p>Amend (HCV – WT – P2) as follows.</p> <p>“Wāhi tūpuna are protected by:</p> <p>1. avoiding significant adverse effects on the cultural values associated with identified wāhi tūpuna,</p> <p>2. where adverse effects demonstrably cannot be completely avoided, remedying or mitigating</p>	<p>Avoiding adverse effects does not necessarily mean that development of the National Grid cannot occur in Wāhi Tupuna.</p> <p>A more nuanced approach is required.</p>	Disallow

			<p>adverse effects in a manner that maintains the values of the wāhi tūpuna,</p> <p>3. managing identified wāhi tūpuna in accordance with tikaka Māori,</p> <p>4. avoiding any activities that may be considered inappropriate in wāhi tūpuna as identified by Kāi Tahu, and</p> <p>5. encouraging the enhancement of access to wāhi tūpuna to the extent compatible with the particular wāhi tūpuna, and</p> <p><u>6. managing the effects of the development of the National Grid on wāhi tūpuna in accordance with EIT – INF – Px and (1) and (4) above do not apply.”</u></p> <p>AND Cross reference Policy between HCV – WT – P2 (Submission Point 00314.045) and EIT – INF (Submission Point 00314.57)</p>		
00226 Kāi Tahu ki Otago / Aukaha	00226.279	Amend	<p>CV – WT – M1</p> <p>Amend as follows:</p> <p>Local authorities must:</p> <p>(1) enable Kāi Tahu to identify wāhi tūpuna sites, areas and values, where appropriate, <u>using the guide set out in APP7</u></p> <p>(2) identify wāhi tūpuna using the guide set out in APP7, ...</p>	The amendments sought provide more efficient drafting. These amendments are complimentary to the submission by Te Ao Marama below.	Allow
00223 Te Ao Marama	00223.121	Amend	HCV – WT – M1	Amendments sought provide greater detail and clarity for plan users	Allow

			<p>Amend as follows: “Local authorities must: (1) enable Kāi Tahu to identify wāhi tūpuna sites, areas and <u>values according to mātauraka</u>,</p> <p>(2) identify wāhi tūpuna using the guide set out in APP7,</p> <p>(3) ...</p> <p>(4) identify, map <u>including through processes that involve mapping</u>, describe and protect the areas and values identified under (1) of those areas <u>through provisions</u> in the relevant regional and district plans or, if a site is a sensitive cultural site, including through the use of alert layers where desirable to advise of sensitive cultural sites without that avoid disclosure in plans.”</p>		
00226 Kāi Tahu ki Otago / Aukaha	00226.2 80	Amend	<p>HCV – WT – M2</p> <p>Amend as follows:</p> <p>HCV – WT – M2</p> <p>Local authorities must prepare or amend and maintain their regional and district plans to include methods that: are in accordance with tikaka, to</p> <p>(1) control activities in, or adjacent to, wāhi tūpuna sites and areas,</p> <p>(2) <u>enable Kāi Tahu to manage wāhi tūpuna in accordance with tikaka Māori</u>,</p> <p>(3) require cultural impact assessments where activities have the potential to adversely affect <u>the values of</u> wāhi tūpuna,</p>	The changes sought to drafting provide greater clarity for plan users	Allow

			<p>(4) require including conditions on resource consents or designations to provide buffers or setbacks between wāhi tūpuna and incompatible activities,</p> <p>(5) require including accidental discovery protocols as conditions on resource consents or designations for activities that may unearth <u>affect</u> archaeological sites, and</p> <p>(6) maintain existing access to identified wāhi tūpuna sites and areas and promote improved access where practicable <u>and appropriate</u>.</p>		
00239 Federated Farmers of New Zealand	00239.1 53	Amend	<p>HCV – WT – M3</p> <p>Once values are identified make them known to landowners</p>	In relation to wāhi tupuna sites and areas, it is not always necessary or appropriate to disclose details of values to landowners in order for them to be protected. This will depend on the site, the values and the relationship which mana whenua have with the landholders concerned. Further, it is not necessary or appropriate to include at an RPS level a requirement to do so.	Disallow
00226 Kāi Tahu ki Otago / Aukaha	00226.281	Amend	<p>HCV – WT – M3</p> <p>Amend as follows: HCV – WT – M3 – Collaboration <u>Treaty Partnership</u> with Kāi Tahu</p> <p><u>Local authorities must:</u></p>	Amendments sought allow the Council to discharge their duties under Part II of the RMA, particularly section 6(e), 7(a) and 8	Allow

			<p><u>(1) include Kāi Tahu in all decision – making concerning identification and protection of wāhi tūpuna sites and areas and the values that contribute to their significance, and</u></p> <p><u>(2) in decision – making outside identified wāhi tūpuna, recognise and provide for Kāi Tahu's ancestral and enduring relationship with all whenua, wai māori and coastal waters within their takiwā.</u></p> <p>Local authorities must include Kāi Tahu in all decision making concerning protection of the values of wāhi tūpuna sites and areas and collaborate with Kāi Tahu to</p> <p>1. identify and protect places, areas or landscapes of cultural, spiritual or traditional significance to them,</p> <p>2. identify and protect the values that contribute to their significance, and</p> <p>3. share information relevant to Kāi Tahu interests.</p>		
00226 Kāi Tahu ki Otago / Aukaha	00226.285	Amend	<p>HCV – WT – AER2</p> <p>Amend as follows: HCV – WT – AER2 Wāhi tūpuna and their values are maintained <u>protected</u>.</p>	Relief sought creates better consistency with policies and methods	Allow

Te Rūnanga o Ngāi Tahu Further Submission: Schedule One

Part 4: Natural Features and Landscapes, Urban Form and Development, Evaluation and Monitoring, Appendices and Maps

I support/oppose the submission of:	Original submission point number	Support OR Oppose	Relief sought	The reasons for my support/opposition are:	I seek that the whole (or part) of the submission be allowed (or disallowed):
Natural Features and Landscapes					
00022 Raynoir Matariki Forests	00020.024	Oppose	NFL – General Delete all references and provisions related to areas with high values	Areas with high values include matters of national importance listed under section 6 of the RMA, and which the Council must recognise and provide for in discharging their duties under the Act.	Disallow
00226 Kāi Tahu ki Otago / Aukaha	00226.304	Support in part	NFL – General Replace all references to ‘natural features and landscapes’ with ‘natural features, landscapes and seascapes.’	Amendment sought provides clarity and integration with the Coastal Environment chapter. However an assessment needs to be undertaken to ensure that the addition of seascapes does not create perverse outcomes if these areas have not been assessed for all their values under the RMA.	Allow in part

00223 Te Ao Marama	00223.127	Support	<p>NFL – General</p> <p>[Specific changes not identified]</p> <p>Recognise the connection between this chapter and the Wāhi Tūpuna chapter and amend to improve that connection.</p>	It it is appropriate to fully consider the approach to providing for section 6(e) and section 6(b) matters.	Allow
00223 Te Ao Marama	00223.129	Support	<p>NFL – New provision</p> <p>Include an additional Anticipated Environmental Result, as follows:</p> <p><u>“The relationship between outstanding and highly valued natural features and landscapes and Kāi Tahu values is identified.”</u></p>	It it is appropriate to fully consider the approach to providing for section 6(e) and section 6(b) matters.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.297	Support in part	<p>NFL – O1</p> <p>NFL – O1 – Outstanding and highly valued natural features, and landscapes <u>and seascapes</u></p> <p>The areas and values of Otago’s outstanding and highly valued natural features, and landscapes, <u>and seascapes</u> are identified, and the use and development of Otago’s natural and physical resources results in:</p> <p>(1) the protection of outstanding natural features, and landscapes, <u>and seascapes</u>.</p> <p><u>(2) the restoration of the areas and values of outstanding and highly valued natural features, landscapes, and seascapes where those areas or values have been reduced or lost, and</u></p> <p>the maintenance or enhancement of highly valued natural features, and landscapes <u>and seascapes</u>.</p>	<p>Amendments sought will assist in achieving section 6(b) of the RMA.</p> <p>However an assessment needs to be undertaken to ensure that the addition of seascapes does not create perverse outcomes if these areas have not been assessed for all their values under the RMA.</p>	Allow in part

00226 Kāi Tahu ki Otago / Aukaha	00226.298	Support in part	<p>NFL – P1</p> <p>Amend as follows:</p> <p>In order to manage outstanding and highly valued natural features and landscapes identify:</p> <p><u>Manage outstanding and highly valued natural features, landscapes, and seascapes by identifying:</u></p> <p>(1) the areas and values of outstanding and highly valued natural features, and <u>landscapes, and seascapes</u> in accordance with APP9, and</p> <p>the capacity of those natural features, and <u>landscapes, and seascapes</u> to accommodate use or development while protecting the values that contribute to the natural feature, and <u>landscape, or seascape</u> being considered outstanding or highly valued.</p>	<p>Amendments sought provide further clarity to drafting.</p> <p>However an assessment needs to be undertaken to ensure that the addition of seascapes does not create perverse outcomes if these areas have not been assessed for all their values under the RMA.</p>	Allow in part
00223 Te Ao Marama	00223.128	Support	<p>NFL – P1</p> <p>Amend as follows:</p> <p>“ ...</p> <p>(1) the areas and values of outstanding and highly valued natural features and landscapes, <u>and their relationship with wāhi tūpuna</u>, in accordance with <u>APP7 and APP9</u>, and ...</p> <p>(2) ... the values that contribute to the natural feature and landscape being considered outstanding or, highly valued <u>or wāhi tūpuna</u>.”</p>	<p>It is appropriate to fully consider the approach to providing for section 6(e) and section 6(b) matters.</p>	Allow
00315 Aurora Energy Limited	00315.074	Oppose	<p>NFL – P2</p> <p>Amend as follows:</p>	<p>A ‘carve out’ for infrastructure is not appropriate. Adverse effects of infrastructure need</p>	Disallow

			<p>Include a carve – out for infrastructure as follows by adding:</p> <p>“... (3) with respect to infrastructure, EIT – INF – P13 applies instead of NFL – P2.”</p>	to be avoided, remedied or mitigated as appropriate to achieve Part II of the RMA.	
00226 Kāi Tahu ki Otago / Aukaha	00226.299	Support in part	<p>NFL – P2 NFL – P3</p> <p>Amend as follows:</p> <p>NFL – P2 – Protection of outstanding natural features, and landscapes, <u>and seascapes</u></p> <p>Protect outstanding natural features, and landscapes, <u>and seascapes</u> by:</p> <p>(1) avoiding adverse effects on the values that contribute to the natural feature, or landscape, <u>or seascape</u> being considered outstanding, even if those values are not themselves outstanding, and avoiding, remedying or mitigating other adverse effects.</p>	<p>Amendments sought are consistent with previous amendments and provide clarity of drafting.</p> <p>However an assessment needs to be undertaken to ensure that the addition of seascapes does not create perverse outcomes if these areas have not been assessed for all their values under the RMA.</p>	Allow in part
00226 Kāi Tahu ki Otago / Aukaha	00226.300	Support in part	<p>NFL – P3</p> <p>Amend as follows:</p> <p>NFL – P3 – Maintenance of highly valued natural features, and landscapes <u>and seascapes</u></p> <p>Maintain or enhance highly valued natural features, and landscapes <u>and seascapes</u> by:</p> <p>(1) avoiding significant adverse effects on the values of the natural feature, <u>or</u> landscape, <u>or</u></p>	<p>Amendments sought are consistent with previous amendments and provide clarity of drafting.</p> <p>However an assessment needs to be undertaken to ensure that the addition of seascapes does not create perverse outcomes if these areas have not been assessed for all their values under the RMA.</p>	Allow in part

			<u>seascape</u> , and avoiding, remedying, or mitigating other adverse effects.		
00226 Kāi Tahu ki Otago / Aukaha	00226.301	Support in part	<p>NFL – P4</p> <p>Amend as follows:</p> <p>Promote restoration of the areas and values of outstanding and highly valued natural features, and landscapes, <u>and seascapes</u> where those areas or values have been reduced or lost.</p>	<p>Amendments sought are consistent with previous amendments and provide clarity of drafting.</p> <p>However an assessment needs to be undertaken to ensure that the addition of seascapes does not create perverse outcomes if these areas have not been assessed for all their values under the RMA.</p>	Allow in part
00226 Kāi Tahu ki Otago / Aukaha	00226.302	Support in part	<p>NFL – P5</p> <p>Amend as follows:</p> <p>Reduce the impact of wilding conifers on outstanding and highly valued natural features, and landscapes, <u>and seascapes</u> by:</p> <p>(1) avoiding afforestation and replanting of plantation forests with wilding conifer species listed in APP5 within:</p> <p>(a) areas identified as outstanding natural features, or landscapes, <u>or seascapes</u>, and</p> <p>(b) buffer zones adjacent to outstanding natural features, and landscapes, <u>and seascapes</u> where it is necessary to protect the outstanding natural feature or landscape, and</p>	<p>Amendments sought are consistent with previous amendments and provide clarity of drafting.</p> <p>However an assessment needs to be undertaken to ensure that the addition of seascapes does not create perverse outcomes if these areas have not been assessed for all their values under the RMA.</p>	Allow in part

				
00021 Raynoir Matarki Forests	00020.023	Support in part	NFL – P5 Amend as follows: (b) areas identified as outstanding natural features or landscapes, and (c) buffer zones adjacent to outstanding natural features and landscapes where it is necessary to protect the outstanding natural feature or landscape, and <u>any forests, shelter belts and amenity planting, and</u>	The location of the amendment is incorrect as the policy protects ONL rather than forests, shelter belts and amenity planting. The amendment could be relocated.	Allow in part
00226 Kāi Tahu ki Otago / Aukaha	00226.303	Support	NFL – P6 Amend as follows: NFL – P6 – Coastal features and landscapes Natural features and landscapes located within the coastal environment are managed by CE – P6 and implementation of CE – P6 also contributes to achieving NFL – O1.	The amendments sought are required to achieve a broader package of submission points.	Allow
Urban Form and Development					
00223 Te Ao Marama	00223.130	Support	General Retain the aspects of this chapter that support climate change response and improved management of three waters infrastructure to support implementation of Te Mana o te Wai and protect the mauri of the coastal environment, as well as Kāi Tahu involvement.	Assists in achieving section 7(i) of the RMA.	Allow

00226 Kāi Tahu ki Otago / Aukaha	00226.306	Support	General Amend the UFD objectives, policies, and methods to reflect the management approach to stormwater and wastewater set out in LF – FW – P15.	Amendments assist in implementation of the Proposed RPS.	Allow
00223 Te Ao Marama	00223.132	Support	New Provision Include a further Anticipated Environmental Result relevant to effects management and supporting values.	Assists in implementation of the Proposed RPS.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.307	Support	UFD -01 Amend to address the matters for clarification raised. Clause 2 needs clarification as to: - What is covered by 'significant values and features'? Is it RMA s6 matters? Or wider than that? Kā Rūnaka seek that values and features of significance to Kāi Tahu (such as wāhi tūpuna) are captured by this clause. - The 'maintains or enhances' phrasing will not always be adequate for matters that may require protection, preservation or some other form of provision.	Amendments sought will improve clarity of the proposed RPS.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.308	Support	UFD-02 Amend to include an improved version of clause UFD – O1(2). When considering development and change of urban areas, the objective should also include outcomes for 'significant' areas as contemplated in UFD – O1, including wāhi tūpuna.	Amendments sought will assist implementation of the proposed RPS.	Allow

00321 New Zealand Infrastructure Commission	00321.085	Support	UFD-02 Amend to provide clearer direction and give priority to affordable housing and efficient transport.	Affordable housing is an issue of importance for Te Rūnanga o Ngāi Tahu.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.309	Support	UFD-03 Amend to address the matters for clarification raised. As with UFD – O1(2), clause 2 is unclear both in coverage (what is captured and what does 'locationally relevant' or 'regionally significant' mean?) and language (what does 'recognise and provide for' mean in this context?).	Amendments sought will improve clarity of proposed RPS.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.310	Support	UFD-04 As with UFD – O1 and UFD – O3, clause 1 needs clarification in terms of coverage and language. The objective needs to recognise and provide for the location of marae, kāika, papakāika and whānau housing in rural areas. AND add a new clause as follows: <u>provides for the use of rural areas by Kāi Tahu in accordance with MW – P4</u>	Greater clarity of drafting will assist plan users. Clarification re locations of marae, kāika, and papakaika will also provide appropriate policy direction.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.312	Support	UFD-P1 Amend to address the matters for clarification raised. As with the objectives, the coverage and language of clause 8 needs to be clarified.	Amendments sought will improve clarity of proposed RPS.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.313	Support	UFD-P2 Retain as notified	Policy appropriately manages urban intensification.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.314	Support	UFD-P3 Amend to address the matters for clarification raised. As raised elsewhere in this submission, the	Further clarification of highly productive land will assist	Allow

			coverage and language of clause 6 needs to be clarified.	interpretation of proposed RPS.	
00226 Kāi Tahu ki Otago / Aukaha	00226.315	Support	UFD-P4 Amend to address the matters for clarification raised. As raised elsewhere in this submission, the coverage and language of clause 5 and 7b need to be clarified. The reference to LF – LS – P16 in clause 4 appears to be wrong, and should be corrected to LF – LS – P19. The policy does not overtly contribute toward achieving UFD – O5. It would be clearer to link this policy to the climate change outcomes sought	To assist interpretation of Proposed RPS.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.316	Support	UFD-P5 Retain as notified	Achieves an appropriate balance in allowing some commercial activity in urban areas.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.317	Support	UFD-P6 Amend by inserting a new clause 3 as follows: <u>(3) providing for the expansion of existing areas or establishment of new areas identified in (1) and (2) by first applying UFD – P1 and UFD – P2</u>	Improves connections within the proposed RPS through cross references.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.318	Support	UFD-P7 Amend clause 3 to replace use of “primary production”, in relation to use of highly productive land, with reference to outdoor agricultural, pastoral and horticultural production or a defined term that clearly excludes mining, quarrying, forestry and production of commodities within buildings. Amend as follows:	Consistent with previous amendments and provides for use of rural areas by Kāi Tahu which is appropriate in light of locations of marae and reserves.	

			<p><u>(6)</u> provides for the use of rural areas by Kāi Tahu in accordance with MW – P4 and UFD – P9.</p> <p><u>(7)</u>(6) restricts the establishment of residential activities, sensitive activities, and non – rural businesses not covered by (6) which could adversely affect, including by way of reverse sensitivity, the productive capacity of highly productive land, primary production and rural industry activities, and</p> <p><u>(8)</u>(7) otherwise limits the establishment of residential activities, sensitive activities, and non – rural businesses not covered by (6) to those that can demonstrate an operational need to be located in rural areas. the following amendments are needed: 1. As raised elsewhere, clause 1 needs clarification in terms of coverage and language. 2. The term “primary production” is defined in the National Planning Standards to include a range of activities that do not rely on highly productive land, including mining, quarrying, forestry, and production of commodities within buildings. It would be inappropriate for the PORPS to provide for these activities on highly productive land.</p> <p>The objective needs to recognise and provide for the location of marae, kāika, papakāika and whānau housing in rural areas, noting that there will need to be flexibility around use of rūnaka and whānau lands as climate change effects escalat</p>		
00226 Kāi Tahu ki Otago / Aukaha	00226.319	Support	<p>UFD-P8</p> <p>Amend to address the matters for clarification raised. As raised elsewhere in this submission, the</p>	Amendment sought improves clarity of the proposed RPS.	Allow

			coverage and language of clause 6 needs to be clarified.		
00226 Kāi Tahu ki Otago / Aukaha	00226.320	Support	UFD-P9 Amend as follows: <u>Facilitate and enable the development by mana whenua of Native Reserves and Te Ture Whenua Māori land, and land with a particular ancestral connection</u> , for papakāika, kāika, nohoaka, and marae and marae related activities , where existing or planned development infrastructure of sufficient capacity is or can be provided (including allowance for self – servicing systems).	Provides additional detail to assist in the delivery of the proposed PRS.	Allow
00226 Kāi Tahu ki Otago / Aukaha	00226.321	Support	UFD-P10 Retain as notified	Provision of criteria to assist in interpretation of the proposed RPS is appropriate.	Allow
Evaluation and Monitoring					
00226 Kāi Tahu ki Otago / Aukaha	00226.325	Support	General Amend to change instances of 'takata whenua' to 'mana whenua'	The relief sought improves accuracy.	Allow
Appendices and Maps					
00226 Kāi Tahu ki Otago / Aukaha	00226.326	Support	Table 4 Amend as follows: In Table 4, delete first row referring to cultural and spiritual values. Below Table 4, add the following:	Te Rūnanga o Ngāi Tahu considers all waterbodies are important. The concept of outstanding waterbodies elevates some waterbodies over others.	Allow

			<u>Kāi Tahu cultural and spiritual values: Kāi Tahu cultural and spiritual values are not included in the criteria for identifying outstanding water bodies, because ranking of water bodies in respect to the cultural and spiritual values associated with wai Māori is not consistent with the nature of the Kāi Tahu relationship with freshwater. Instead, when a water body is identified as outstanding in accordance with the criteria in Table 4, Kāi Tahu values associated with the water body will also be identified and will be protected under LF – FW – P12 and LF – FW – M5(5) in the same way as outstanding values identified using the criteria.</u>		
00223 Te Ao Marama	00223.133	Support in part	Table 4, Remove reference to Cultural and Spiritual values from Table 4	Te Rūnanga o Ngāi Tahu considers all waterbodies are important. The concept of outstanding waterbodies elevates some waterbodies over others.	Allow in part
00024 City Forests Limited	00024.016	Support in part	APP5 – Species prone to wilding conifer spread Remove heavy seed species such as radiata pine from APP5.	Radiata pine does not have the same level of risk as many other tree species.	Allow in part
00226 Kāi Tahu ki Otago / Aukaha	00226.327	Support	APP7 – identifying wāhi tūpuna Amend as follows: Kāi Tahu use the term ‘wāhi tūpuna’ to describe landscapes <u>and places</u> that embody the customary and contemporary relationship of Kāi Tahu <u>whānui</u> and their culture and traditions with Otago . It is	The concept of wāhi tūpuna is consistent with Section (e) of the RMA. The amendments sought provide greater clarity to drafting.	Allow

			<p>important ... The different elements of these sites <u>areas</u> of significance include:</p> <p>Table 9: Sites <u>Areas</u> of significance to Kāi Tahu... raupō-raupō ...</p> <p>Add 'tuhituhi neherā – rock art sites' to Table 9.</p>		
00223 Te Ao Marama	00223.135	Support	<p>APP7 – identifying wāhi tūpuna</p> <p>Amend reference in the first sentence of the second paragraph to match the definition contained in the Interpretation section</p>	The amendment sought is consistent with the drafting provided by Aukaha above.	Allow
00223 Te Ao Marama	00223.136	Support	<p>APP9 – Identification criteria for outstanding and highly valued natural features, landscapes and seascapes</p> <p>Remove reference to Cultural and Spiritual values for Kāi Tahu in Associative Attributes</p>	There may be instances where cultural and spiritual values are not appropriate in associated attributes. Te Rūnanga suggests Papatipu Rūnanga ought to exercise their rakatirataka in making decisions on such inclusions and the criteria should note that the inclusion of cultural or spiritual values is at the direction of the Papatipu Rūnaka who represent those who hold mana whenua.	Allow in part
00226 Kāi Tahu ki Otago / Aukaha	00226.328	Support	<p>MAP1 – Freshwater Management Units</p> <p>Amend boundaries of North Otago and Dunedin & Coast FMUs so that the Waikouaiti catchment is included in the Dunedin & Coast FMU.</p>	Te Rūnanga o Ngāi Tahu considers the relief sought to be consistent with the needs and aspirations of Ngāi Tahu Whānui.	Allow

RPS

From: Tanya Stevens <Tanya.Stevens@ngaitahu.iwi.nz>
Sent: Friday, 12 November 2021 1:24 p.m.
To: RPS
Cc: Lynda Murchison; Mike Bennett; Sandra McIntyre; Michael Bathgate; Maria Bartlett
Subject: Te Runanga o Ngai Tahu: Further Submissions
Attachments: Te Runanga o Ngai Tahu Further Submissions ORC RPS.pdf; Further submission Schedule Part 1.docx; Further submission Schedule Part 1.pdf; Further submission Schedule Part 2.docx; Further submission Schedule Part 3.docx; Further submission Schedule Part 3.pdf; Further submission Schedule Part 2.pdf; Further submission Schedule Part 4.docx; Further submission Schedule Part 4.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Further Submission

Tēnā koe,

Please find attached further submissions by Te Rūnanga o Ngāi Tahu. Please note that the schedule has been split into four sections, which I attach in pdf and also in word as requested by the Council. Copies of these further submissions will be served on submitters within five working days.

Ngā mihi,
Tanya

Tanya Stevens
Senior Planner
Te Rūnanga o Ngāi Tahu
021 708 510
Tanya.Stevens@ngaitahu.iwi.nz



Te Rūnanga o Ngāi Tahu

CAUTION: This email and any attachment(s) contains information that is both confidential and possibly legally privileged.
No reader may make any use of its content unless that use is approved by Te Rūnanga o Ngāi Tahu and its subsidiary companies separately in writing.
Any opinion, advice or information contained in this email and any attachment(s) is to be treated as interim and provisional only and for the strictly limited purpose of the recipient as communicated to us.
Neither the recipient nor any other person should act upon it without our separate written authorization of reliance. If you have received this message in error, please notify us immediately and destroy this message.