

Form 6

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

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

To: Otago Regional Council

1. Name of person making further submission

Waitaki District Council

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

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

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


4. I ~~wish~~/do not wish (Select one) to be heard in support of my further submission.

5. If others make a similar submission, ~~I will~~/will not (Select one) consider presenting a joint case with them at a hearing.

6. Further Submitter Details

a. Signature of person making further submission

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



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

Name Melanie Tavendale

Position Deputy Mayor, Chair - Community, Culture and Regulatory Committee

Organisation Waitaki District Council

c. Date

12 November 2021

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

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

Victoria van der Spek – Executive Officer

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

vanderspek@waitaki.govt.nz

f. Telephone:

03 433 0300

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

Private Bag 50058, Oamaru 9444

7. My further submission is:

I support/oppose the submissions of:

00023 Waterfall Park Developments Limited

00025 Boxer Hills Trust

00026 Moutere Station

00139 Dunedin City Council

00226 Kāi Tahu ki Otago / Aukaha

00230 Royal Forest and Bird Protection Society of New Zealand Incorporated

00235 Otago Water Resource Users Group (OWRUG)

00236 Horticulture New Zealand

00237 Beef & Lamb NZ

00239 Federated Farmers of New Zealand

00313 Queenstown Airport Corporation

00509 Wise Response Society Inc.

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

The particular parts of the submission I support are:

Original submission point number	Support OR Oppose	The reasons for my support/opposition are:	I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed): [Please state].
00023.001 Waterfall Park Developments Limited	Support	<p>The impact of treating the entire PORPS as a freshwater planning instrument for WDC is that the PORPS would be heard, and decisions be made by commissioners with freshwater expertise on non-freshwater matters.</p> <p>Under the freshwater planning instrument process, rather than following the more typical RMA process having decisions on submissions, and then rights of appeal to the Environment Court on their merits, WDC could only appeal to the High Court on questions of law.</p>	<p>Full</p> <p><i>The non-freshwater related provisions in the PORPS are not in the scope of the Freshwater planning process.</i></p> <p><i>ORC should adopt a Schedule 1, Part 1 or Schedule 1, Part 5 process for the parts of the PORPS that do not relate to freshwater.</i></p>
00025.001 Boxer Hills Trust	Support	<p>The impact of treating the entire PORPS as a freshwater planning instrument for WDC is that the PORPS would be heard, and decisions be made by commissioners with freshwater expertise on non-freshwater matters.</p> <p>Under the freshwater planning instrument process, rather than following the more typical RMA process having decisions on submissions, and then rights of appeal to the Environment Court on their merits, WDC</p>	<p>Full</p> <p><i>The non-freshwater related provisions in the PORPS are not in the scope of the Freshwater planning process.</i></p> <p><i>ORC should adopt a Schedule 1, Part 1 or Schedule 1, Part 5 process for the parts of the PORPS that do not relate to freshwater.</i></p>

		could only appeal to the High Court on questions of law.	
00230.001 Royal Forest and Bird Protection Society of New Zealand Incorporated	Support	<p>The impact of treating the entire PORPS as a freshwater planning instrument for WDC is that the PORPS would be heard, and decisions be made by commissioners with freshwater expertise on non-freshwater matters.</p> <p>Under the freshwater planning instrument process, rather than following the more typical RMA process having decisions on submissions, and then rights of appeal to the Environment Court on their merits, WDC could only appeal to the High Court on questions of law.</p>	<p>Full</p> <p><i>The non-freshwater related provision in the PORPS are not in the scope of the Freshwater planning process.</i></p>
00313.042 Queenstown Airport Corporation	Support	<p>The impact of treating the entire PORPS as a freshwater planning instrument for WDC is that the PORPS would be heard, and decisions be made by commissioners with freshwater expertise on non-freshwater matters.</p> <p>Under the freshwater planning instrument process, rather than following the more typical RMA process having decisions on submissions, and then rights of appeal to the Environment Court on their merits, WDC could only appeal to the High Court on questions of law.</p>	<p>Full</p> <p><i>That a conventional or streamlined planning process is used for those parts of the Proposed Otago Regional Policy Statement that do not genuinely relate to freshwater, in accordance with section 80A (3) of the Act</i></p>
00139.002 Dunedin City Council	Support	Support district plan requirement dates being realistic, especially for smaller territorial authorities such as WDC.	<p>Full</p> <p><i>Amend RPS as required to ensure district plan change requirement dates are realistic and</i></p>

			<p><i>achievable and based on current work programme priorities.</i></p> <p><i>Add content to allow these dates to be changed by mutual agreement in consideration of other priorities.</i></p> <p><i>Where possible align dates with the date required to produce a new plan under any replacement legislation being brought forward through the RM System reform.</i></p>
00139.129 Dunedin City Council	Support	To ensure that the PORPS is not stronger than National Direction (ecosystems and indigenous biodiversity)	<p>Full</p> <p><i>Ecosystems and indigenous biodiversity provisions are in accordance with the NPS Indigenous Biodiversity (when gazetted)</i></p>
00139.179 Dunedin City Council	Support	To create an overall improvement in plan drafting.	<p>Full</p> <p><i>Energy, infrastructure and transport EIT – Amend policies to read less like objectives and more like policies.</i></p>
00235.020 OWRUG	Support	A glossary of te reo terms, words or phrases would be useful. There are a number of te reo terms eg. matauraka used throughout the document and some are not explained while others have bracketed interpretation throughout the text. A central place for interpretation would make this easier for the reader to understand the provisions of the plan.	<p>Full</p> <p><i>TERP – Definitions General</i></p> <p><i>Amend Include te reo terms in the interpretation section</i></p>
00236.111 Horticulture New Zealand	Support	A glossary of te reo terms, words or phrases would be useful.	<p>Full</p>

			<i>Include a glossary of all te reo terms and phrases.</i>
00239.192 Federated Farmers of New Zealand	Support	A glossary of te reo terms, words or phrases would be useful.	Full <i>Adopt a comprehensive glossary of all te reo terms utilised in the RPS.</i>
00239.152 Federated Farmers of New Zealand	Support	A central place for interpretation would make it easier for the reader to understand the provisions of the plan.	Full <i>HCV – Historical and cultural values HCV – WT – M2</i> <i>Amend - Provide a definition of ‘tikaka’ and other key, undefined te reo terms</i>
00237.006 Beef & Lamb NZ	Support	WDC supports the inclusion of a new definition for agricultural intensification following consultation with the relevant sector stakeholders.	Full <i>ERP – Definitions</i> <i>New definition – Agricultural intensification</i> <i>Amend to include a definition of ‘agricultural intensification’ following consultation with the relevant agricultural sector representatives.</i>
00509.021 Wise Response Society Inc	Oppose	WDC opposes introducing ‘enhancement’ as a generic term used across multiple sections of the PORPS. The suggestion definition for enhancement is specific to an issue and/or chapter, and would make no sense when used in a chapter such as the Historical and cultural values section of the RPS.	Full <i>Add a new definition:</i> <i>Enhancement</i> <i>To facilitate species recruitment, co – existence and succession processes by stabilising ecological functioning through time (Ulrich, 2021).</i>

00237.004 Beef & Lamb NZ and Deer Industry NZ	Support	Carbon forestry should be excluded from the definition of primary production.	<p>Full</p> <p><i>Definitions: Primary Production</i></p> <p><i>Amend the definition of primary production to specifically exclude forestry for the purposes of carbon sequestration [carbon forestry]</i></p>
00237.010 Beef & Lamb NZ and Deer Industry NZ	Support	WDC supports the proposed amendment to SRMR – 14 to better recognise and manage the loss of productive soil to urban growth.	<p>Full</p> <p><i>SRMR – Significant resource management issues for the region SRMR – 14</i></p> <p><i>Amend to provide for the following:</i></p> <p><i>Context</i></p> <ul style="list-style-type: none"> • <i>Recognise that the growth of urban areas has an impact on the rural population.</i> <p><i>Environmental</i></p> <ul style="list-style-type: none"> • <i>Explicitly identify that the loss of productive soil to urban growth is irreversible and that productive land is a finite resource that needs protecting.</i> • <i>Highlight the link of loss of productive soil with the associated loss of biodiversity, ecosystem services, natural landscapes, and amenity values.</i> • <i>Identify rural functions as essential and highly beneficial aspects of the regional environment.</i> • <i>Change the perspective of describing the issue of reverse – sensitivity and ensure the onerous is put on urban development.</i>

			<p><i>Economic</i></p> <ul style="list-style-type: none"> • State that urban expansion onto productive land can result in reverse sensitivity issues when inadequately managed and compromise the existing rural function and that this should be avoided. <p><i>Social</i></p> <p>Describe the economic implications of loss of productive soil on rural communities and the wider region.</p>
00236.033 Horticulture New Zealand	Support	WDC supports the proposed additional SRMR as it mirrors WDC's concerns around the fragmentation of high-class soils.	<p>Full</p> <p><i>SRMR – Significant resource management issues for the region</i></p> <p><i>New – Provision</i> <i>Add</i></p> <p><i>“SRME – IX Food production systems are coming under increased pressure from population growth, competing resource use, climate change, and the need to improve environmental outcomes.”</i></p>
00239.027 Federated Farmers of New Zealand	Support	Carbon forestry is an emerging land use issue for the Otago region and should be identified as a significant resource management issue in the PORPS.	<p>Part – see below</p> <p><i>Significant resource management issues for the region SRMR – 18</i></p> <p><i>Amend ‘Context’ as follows: “Activities occurring ... plantation and carbon forestry,”</i></p>
00239.095 Federated Farmers of New Zealand	Support	WDC considers there is scope to promote the sustainable management of carbon forestry	Full

		<p>through Otago's RPS in the absence of any national direction to date.</p> <p>Regional direction is needed to ensure a consistent approach to its management across the territorial authorities of Otago.</p>	<p><i>LF – Land and freshwater LF – LS – M12 Amend as follows: (1) manage land use change by: (a) controlling the establishment of new or any spatial extension of existing plantation or carbon forestry activities where necessary to give effect to an objective developed under the NPSFM, and... “</i></p>
00239.021 Federated Farmers of New Zealand	Support	<p>Reinforce the interlinkage between climate change and forestry, afforestation including the increased risk of fire and pests.</p>	<p>Full</p> <p><i>SRMR – Significant resource management issues for the region SRMR – I2</i></p> <p><i>Amend ‘Statement’ – add an additional sentence as follows or similar: “Climate change brings an increased risk of wildfire. With changing landscape use (increased forestry and afforestation) the risk of fire is increased. Another potential impact comes from increased pests and diseases associated with changing or warming climates, risking the health of livestock, vegetation and biodiversity”.</i></p>
00235.058 OWRUG	Support	<p>Carbon forestry is an emerging land use issue for the Otago region.</p> <p>WDC considers there is scope to promote the sustainable management of carbon forestry through Otago's RPS in the absence of any national direction to date.</p> <p>Regional direction is needed to ensure a consistent approach to its management across the territorial authorities of Otago.</p>	<p>Full</p> <p>SRMR Significant resource management issues for the region</p> <p><i>New – Provision</i></p> <p><i>Impact snapshot Environmental</i></p> <p><i>There needs to be a considered and integrated approach to land – use change so that it does not give rise to unintended consequences. For example, widespread establishment of carbon</i></p>

			<i>forestry may adversely affect.... irreversibly remove land from food production.</i>
00226.209 Kāi Tahu ki Otago / Aukaha	Support	Carbon forestry is an emerging land use issue for the Otago region. The effects of Carbon forestry activities must be managed appropriately through District Plan provisions, but not solely to give effect to an objective developed under the NPSFM.	Part – see below <i>LF – Land and freshwater LF – LS – M12</i> <i>Amend as follows:</i> <i>Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to: (1) manage land use change by: (a) controlling the establishment of new or any spatial extension of existing plantation forestry activities <u>or carbon farming [forestry] activities</u></i>
00026.007 Moutere Station	Oppose	WDC supports the retention of the objective as drafted without amendment.	Full <i>LF – Land and freshwater</i> <i>LF – FW – O8</i> <i>Amend (2) as follows: ... where appropriate water flow is continuous throughout the whole system,</i>
00026.008 Moutere Station	Oppose	WDC supports the retention of the objective as drafted without amendment.	Full <i>LF – Land and freshwater</i> <i>LF – FW – O8</i> <i>Amend (4) as follows: ... where appropriate native fish can migrate easily and as naturally as possible and taoka species and their habitats are protected, and ...</i>

00139.134 Dunedin City Council	Support	To better control wilding conifers in all areas where there is indigenous vegetation and habitat, and not just within defined SNA's.	<p>Full</p> <p><i>ECO – Ecosystems and indigenous biodiversity</i></p> <p><i>ECO – P9 Amend the policy to manage wilding conifers within areas of indigenous vegetation/habitat that are not identified as SNAs.</i></p>
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Address List for Further Submissions

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RPS

From: Victoria van der Spek <vvanderspek@waitaki.govt.nz>
Sent: Friday, 12 November 2021 10:02 a.m.
To: RPS
Subject: PORPS Further Submission - Waitaki District Council
Attachments: PORPS Further Submission of Waitaki District Council signed 12 November 2021.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Further Submission

Good morning

Please see Waitaki District Council's Further Submission to the Proposed Otago Regional Policy Statement.

Ngā mihi
Victoria

Victoria van der Spek
Executive Officer

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