

From: [Graeme Mathieson](#)
To: [RPS](#)
Cc: [Coxhead, JohnD](#)
Subject: AgResearch Further Submission - Proposed Otago Regional Policy Statement 2021
Date: Friday, 12 November 2021 3:07:23 p.m.
Attachments: [ATT00001.gif](#)
[AgResearch Further Submission Proposed Otago RPS.pdf](#)

Dear Sir/Madam

On behalf of my client AgResearch Limited, please find attached a further submission in relation to the Proposed Otago Regional Policy Statement 2021.

Please do not hesitate to contact me if you wish to discuss any aspect of the submission, have any queries or require any further information.

Regards - Graeme



Graeme Mathieson
Senior Consultant

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FORM 6

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

Clause 8 of Schedule 1, Resource Management Act 1991

To Otago Regional Council
Private Bag 1954
DUNEDIN 9054

Email: rps@orc.govt.nz

Name AgResearch Limited

1. Further submitter details

Name of further submitter: AgResearch Limited ("**AgResearch**")

AgResearch made a submission on the Proposed Otago Regional Policy Statement ("**PORPS**"), being submission no. 00208.

2. Only certain people can make a further submission

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

- a. AgResearch Limited has significant assets and operational interests within the Otago Region. AgResearch owns and operates the Invermay Research Centre which is located on Puddle Alley, on the eastern outskirts of Mosgiel. Invermay consists of a Research Campus and two research farms.
- b. The research undertaken by AgResearch at Invermay is of regional and national significance to the agricultural sector. Consequently, AgResearch seeks to ensure that the PORPS adequately recognises, provides for and protects the continued use and development of significant research facilities such as Invermay.

3. Hearing options

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

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

Signature:

AGRESEARCH LIMITED

by its authorised agents Mitchell Daysh Ltd



Date:

12 November 2021

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4. Further submission details

Submitter	Submission Point	Specific provision	Position on submission point	Reasons for support or opposition	Decision sought from Council
Fonterra Co-operative Group Ltd	00213.007 ¹	New definition ‘Regionally significant industry’	Support	AgResearch supports the introduction of the following definition for “ <i>regionally significant industry</i> ”: <i>means an economic activity based on the use of natural and physical resources in the region which has been shown to have benefits that are significant at a regional or national scale. These may include social, economic or cultural benefits.</i> The research undertaken by AgResearch at the Invermay Research Centre is of regional and national significance to the agricultural sector, so the facility would fall within the ambit of the definition of “ <i>regionally significant industry</i> ” sought by the submitter. The submitter has also sought the introduction of a new policy framework to ensure that the continued use and development of “ <i>regionally significant industry</i> ” is adequately recognised, provided for and protected (which is also supported by AgResearch).	Accept in full.
Waka Kotahi NZ Transport Agency	00305.005	New definition ‘Reverse sensitivity’	Support	AgResearch supports the proposed definition for “reverse sensitivity”. The management of reverse sensitivity effects is an important resource management issue that is addressed within the PORPS.	Accept in full.
Fonterra Co-operative Group Ltd	00213.009	Definition ‘Sensitive activity’	Support	AgResearch agrees that the definition of “sensitive activity” is too narrow and should be broadened to identify a full range of relevant activities, particularly for the purposes of managing reverse sensitivity effects.	Accept in full.
Fonterra Co-operative Group Ltd	00213.015	Issue SRMR-I4	Support	The research undertaken by AgResearch at the Invermay Research Centre is of regional and national significance to the agricultural sector, so the facility would fall within the ambit of the definition of “ <i>regionally significant industry</i> ” sought by the submitter. AgResearch agrees that it is appropriate to recognise the adverse economic implications associated with locating incompatible activities (such as urban and residential growth) in the vicinity of “ <i>regionally significant industry</i> ”. Inadequate management of reverse sensitivity effects can severely constrain the continued use and development of important facilities such as “ <i>regionally significant industry</i> ”.	Accept in full.
Fonterra Co-operative Group Ltd	00213.016	Issue SRMR-I6	Support	The research undertaken by AgResearch at the Invermay Research Centre is of regional and national significance to the agricultural sector, so the facility would fall within the ambit of the definition of “ <i>regionally significant industry</i> ” sought by the submitter. AgResearch supports the addition of a further “ <i>significant resource management issue</i> ” focusing on the dependence of regional communities’ social and economic well-being on:	Accept in full.

¹ The Summary of Decisions Requested Report incorrectly number numbered submission points made by Fonterra Co-operative Group Ltd as 00213.xxx. Fonterra’s submitter no. is 00233. Waitaki Irrigators Collective Limited is submitter no. 00213. For the avoidance of doubt, please refer to the ‘Submitter’ column of the table in the Summary of Decisions Requested Report for the correct submitter number in conjunction with the specific submission point numbering.

Submitter	Submission Point	Specific provision	Position on submission point	Reasons for support or opposition	Decision sought from Council
				<p>a) resource use and the need to provide for that use within sustainable limits; and</p> <p>b) the importance of regionally significant industry and infrastructure to economic and social well-being and the need to protect it from the effects of reverse sensitivity.</p> <p>Locating incompatible activities in the vicinity of “regionally significant industry” can result in reverse sensitivity effects which can severely constrain the continued use and development of such facilities.</p>	
Fonterra Co-operative Group Limited	00213.022	Proposed new Objective IM-O5	Support	<p>The research undertaken by AgResearch at the Invermay Research Centre is of regional and national significance to the agricultural sector, so the facility would fall within the ambit of the definition of “regionally significant industry” sought by the submitter. AgResearch supports the addition of the following proposed new Objective IM-O5 which appropriately seeks to ensure that the continued use and development of “regionally significant industry” is adequately recognised and protected:</p> <p><u>“IM-O5 – Regionally significant industry and infrastructure</u> <u>The social, economic and cultural well-being of Otago’s communities is enabled through the appropriate protection, use and development of regionally significant infrastructure and regionally significant industry.”</u></p>	Accept in full
Fulton Hogan Limited	00322.012	Policy AIR-P4	Support	<p>AgResearch agrees that the Policy AIR-P4 should be amended so it is clear that any offensive, objectionable, noxious or dangerous effects of air discharges are avoided “beyond the boundary of the property where the discharge originates”.</p>	Accept in full
Horticulture New Zealand	00236.047	Proposed new Policy AIR-P7 Sensitive activities	Support in part	<p>The submitter seeks the following new Policy AIR-P7:</p> <p><u>‘AIR-P7 Sensitive activities - Avoid locating new sensitive activities near existing activities which are permitted or consented to discharge to air’.</u></p> <p>An unqualified ‘avoidance’ requirement may be unduly restrictive given discharges to air (particularly permitted discharges) may not necessarily affect sensitive activities. However, AgResearch agrees that there needs to be greater policy guidance regarding the management of “sensitive activities” in the vicinity of activities that have permitted or consented discharges to air in order to appropriately manage reverse sensitivity effects.</p>	Accept in part
Horticulture New Zealand	00236.049	Method AIR-M3	Support	<p>AgResearch agrees with the addition to Method AIR-M3 as this provides appropriate direction to territorial authorities that they ensure there is spatial separation between new sensitive activities and existing activities that are consented or permitted to discharge contaminants to air. This is a proactive approach which would assist with managing potential reverse sensitive effects.</p>	Accept in full

Submitter	Submission Point	Specific provision	Position on submission point	Reasons for support or opposition	Decision sought from Council
Horticulture New Zealand	00236.051	Explanation AIR-E1	Support	AgResearch agrees with the additional explanation point to AIR-E1 as this provides appropriate direction to territorial authorities that they ensure there are provisions in District Plans relating to the spatial distribution and separation of new urban development areas. This is a proactive approach which would assist with managing potential reverse sensitive effects.	Accept in full
Federated Farmers of New Zealand	00239.173	Objective UFD-O2(6) Development of urban areas	Support	AgResearch agrees that there needs to be greater policy guidance regarding the management of incompatible activities at the urban rural interface, particularly in relation to avoiding reverse sensitivity effects on rural activities from inappropriate urban expansion, so supports the following changes sought by the submitter: <i>"The development and change of Otago's urban areas: ...</i> <i>(6) minimises conflict between incompatible activities and avoids reverse sensitivity issues with existing rural activities."</i>	Accept in full.
Fonterra Co-operative Group Limited	00213.042	Policy UFD-04(2)	Support	The research undertaken by AgResearch at the Invermay Research Centre is of regional and national significance to the agricultural sector, so the facility would fall within the ambit of the definition of "regionally significant industry" sought by the submitter. AgResearch supports the changes sought to Policy UFD-04(2) to ensure that the continued use and development of "regionally significant industry" is not constrained by reverse sensitivity effects arising from the establishment of nearby sensitive or incompatible activities (such as residential development).	Accept in full
Federated Farmers of New Zealand	00239.180	Proposed new Anticipated Environmental Result – UFD-AER-13	Support	AgResearch agrees that there needs to be greater policy guidance regarding the management of incompatible activities at the urban rural interface, particularly in relation to avoiding reverse sensitivity effects on rural activities from inappropriate urban expansion, so supports the addition of the following new Anticipated Environmental Result (UFD-AER 13): <i>"UFD – AER13 The productive capacity, amenity and character of the rural environment and rural activities are not adversely impacted by inappropriate urban expansion and urban activities and reverse sensitivity issues."</i>	Accept in full.