From:	Stephanie Lau
То:	<u>RPS</u>
Cc:	<u>"Joanne Dowd"; "amy.hill@chapmantripp.com"; Anna Johnson; Bridget Irving;</u> "melissa.brook@gueenstownairport.co.nz"; "Erin.auchterlonie@gldc.govt.nz"; "ainsley@amconsulting.co.nz"
Subject:	Further Submission on RPS
Date:	Friday, 12 November 2021 1:38:22 p.m.
Attachments:	image002.png
	Further Submission on RPS.pdf

Good afternoon,

Please find **attached** for filing and service, the further submission of Big Stone Forest Limited.

	Stephanie Lau Legal Administrator
?	stephanie.lau@gallawaycookallan.co.nz
	GALLAWAY COOK ALLAN LAWYERS Level 2, 123 Vogel Street   P O Box 143, Dunedin 9054, NZ   Ph 03 477 7312   Fax: 03 477 5564

#### www.gallawaycookallan.co.nz

Covid-19: Our offices are open and we are able to see clients with appointments (but with masks, sign-in, extra hygiene measures and social distancing).

We are also able to communicate remotely via phone or video and are happy to arrange this with you as needed.

For all contact details click HERE

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## 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

Big Stone Forest Limited (BSF)

- 2. This is a further submission in support of (or in opposition to) a submission on the Proposed Otago Regional Policy Statement 2021 (PRPS 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
Grounds:	BSF is located across Big Stone Road from the proposed landfill at Smooth Hill. Including landfills in the definition of regionally significant infrastructure ( <b>RSI</b> ) may have consequences for how the applications currently being sought by DCC for the landfill are assessed and therefore affect BSF interests.
	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).

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### **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 Bridget Irving

Position Counsel for Big Stone Forest Limited

Organisation Gallaway Cook Allan

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)

**Bridget Irving** 

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

bridget.irving@gallawaycookallan.co.nz, rebecca.crawford@gallawaycookallan.co.nz

f. Telephone:

03 477 7312

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

123 Vogel Street, PO Box 1453, Dunedin 9054

7. BSF makes this submission in support of and opposition to various original submissions in PRPS21. The various submission points that BSF supports or opposes and the decisions sought are set out in **Appendix 1**.

Submitter Name	Submitter number	Contact Person	Email
Aurora Energy Limited	00315	Joanne Dowd	joanne.dowd@auroraenergy.nz
Christchurch International Airport Limited (CIAL)	00307	Amy Hill	amy.hill@chapmantripp.com
Dunedin City Council	00139	Anna Johnson	Anna.Johnson@dcc.govt.nz
Otago Water Resource Users Group	00235	Bridget Irving	bridget.irving@gallawaycookallan.co.nz
Queenstown Airport Corporation Ltd	00313	Melissa Brook	melissa.brook@queenstownairport.co.nz
Queenstown Lakes District Council	00138	Erin Auchterlonie	Erin.auchterlonie@qldc.govt.nz
Transpower New Zealand Limited	00314	Ainsley McLeod	ainsley@amconsulting.co.nz

## Appendix 1:

Submission	Submitter Name	Submission Point	Support/Oppose and decision requested.
00307	Christchurch International Airport Limited (CIAL)	00307.015, 00307.018	BSF <b>supports</b> prioritising safe operation of RSI. BSF seeks the relief be <b>allowed</b> .
00313	Queenstown Airport Corporation	00313.015	BSF <b>supports</b> protection of existing Nationally Significant from the establishment of incompatible activities.

			BSF seeks the relief be <b>allowed</b> .	
00313	Queenstown Airport Corporation	00313.019	BSF <b>supports</b> appropriately providing for Nationally Significant Infrastructure. BSF seeks the relief be <b>allowed</b> .	
00313	Queenstown Airport Corporation	00313.022	BSF <b>supports</b> increasing protection of existing Nationally Significant Infrastructure from adverse and reverse sensitivity effects. BSF seeks the relief be <b>allowed</b> .	
00314	Transpower New Zealand Limited	00314.036	BSF <b>supports</b> the protection of existing Nationally Significant Infrastructure from incompatible activities establishing that may generate adverse effects. BSF seeks the relief be <b>allowed</b> .	
00139	Dunedin City Council	00139.006	BSF <b>opposes</b> defining infrastructure in a manner inconsistent with section 2 of the Resource Management Act 1991. BSF seeks the relief be <b>disallowed</b> .	
00139	Dunedin City Council	00139.007	BSF <b>opposes</b> including landfills in the definition of RSI BSF seeks the relief be <b>disallowed</b> .	
00138	Queenstown Lakes District Council	00138.106	BSF <b>opposes</b> including landfills in the definition of RSI BSF seeks the relief be <b>disallowed</b> .	
00235	OWRUG	00235.114, 00235.116, 00235.117, 00235.118	BSF is <b>neutral</b> to the proposed relief so long as infrastructure definition is consistent with the Act and/or recognition of hierarchy between Nationally and Regionally Significant Infrastructure is maintained.	
00315	Aurora Energy Limited	00315.048	BSF is <b>neutral</b> to the proposed relief so long as infrastructure definition is consistent with the Act and/or recognition of hierarchy between Nationally and Regionally Significant Infrastructure is maintained.	