

From: [Nigel Paragreen](#)
To: [RPS](#)
Subject: Fish and Game Further Submission PORPS
Date: Friday, 12 November 2021 4:57:32 p.m.
Attachments: [image001.jpg](#)
[211112_Fish_and_Game_Further_Submission_PORPS.docx](#)

Hi,

Please find attached a further submission on the PORPS on behalf of the Otago and Central South Island Fish and Game Councils.

Cheers,

Nigel Paragreen | Environmental Officer

Otago Fish and Game Council

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Proposed Otago Regional Policy Statement 2021

Further Submissions

Information for Submitters

Further Submissions must be in the prescribed form (Form 6) specified by the Resource Management (Forms, Fees, and Procedure) Regulations 2003 and must be received by Otago Regional Council **by 5pm Friday 12 November 2021**

Privacy: Be aware that **all further submissions are considered public**, including your name and address which will be uploaded to ORC website as part of this process. The Council and further submitters will use your name and contact details for correspondence in relation to the making of the Regional Policy Statement.

LODGE A SUBMISSION MANUALLY (*USING FORM BELOW*)

A template complying with the requirements of Form 6 is provided below. Once completed, please provide to ORC **by 5pm Friday 12 November 2021** by one of the following:

Email: rps@orc.govt.nz Further Submissions in MS Word (eg docx) are preferred.

Post: Otago Regional Council, Private Bag 1954, Dunedin 9054. Att: Otago Regional Council Policy Team

Hand Delivery at

Dunedin: Otago Regional Council Office, Philip Laing House, Level 2, 144 Rattray Street, Dunedin 9016, Att: Otago Regional Council Policy Team

Queenstown: Terrace Junction, 1092 Frankton Road, Queenstown, Att: Otago Regional Council Policy Team

A copy of your further submission must also be served on the original submitter within 5 working days after it is served on the local authority. Submitter Address for Service details are provided in the Summary of Decisions Requested report.

INQUIRIES

Email: rps@orc.govt.nz

Phone: ORC Call Centre: 0800 474 082, Monday - Friday, 8am-5pm

Note to person making further submission

Please note that your further submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the further submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

These two pages are for information and are not part of the Form and can be deleted when submitting to ORC and Original Submitters.

Further Submission Form 6 commences on the next page.

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

The Otago Fish and Game Council and the Central South Island Fish and Game 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
X	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:	<p>The Councils are non-for-profit organisations with functions set by the Conservation Act 1987, s26Q. The primary functions of the Councils in relation to this plan are:</p> <p>26Q(1) <i>The functions of each Fish and Game Council shall be to manage, maintain, and enhance the sports fish and game resource in the recreational interests of anglers and hunters, and, in particular, —....</i></p> <p>(e) <i>in relation to planning, —</i></p> <p>(i) <i>to represent the interests and aspirations of anglers and hunters in the statutory planning process; and</i></p> <p>(vii) <i>to advocate the interests of the Council, including its interests in habitats: ...</i></p>

	<p>This sub-set of the Councils' functions provide three main directions with respect to Plan Changes 8 and 1: to manage the sports fish and game resource; to represent anglers and hunters; and to advocate the interests of the Council.</p> <p>Because the plan change will affect the sports fish and game resource, the Councils' participation enables them to represent an aspect of the public interest which is relevant to the plan change and greater than that of the general public</p>
	<p>the local authority for the relevant area.</p>

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

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

6. Further Submitter Details

a. Signature of person making further submission

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



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

Name: Nigel Paragreen

Position: Environmental Officer

Organisation: The Otago Fish and Game 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)*

Nigel Paragreen

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

nparagreen@fishandgame.org.nz

f. Telephone:

0272 050 395

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

PO Box 76, Dunedin, 9016

7. My further submission is:

I support/oppose the submission of:

The submitters below

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

The particular parts of the submission I support (or oppose) are:

Whole submissions

Submitter Name	Submission point number	Support or oppose	The reasons for my support / opposition are:	I seek that the whole of the submission be allowed or disallowed
Royal Forest and Bird Protection Society NZ (0230)	Whole submission, except in relation to the provisions stated below.	Support	<p>The submission points aid in improving the clarity of the Proposed Otago Regional Policy Statement (PORPS) 2021 and in giving effect to higher order documents and the Resource Management Act 1991 (RMA).</p> <p>The question raised by the submitter on the use of a Freshwater Planning Process for the entirety of the PORPS should be explored. It is understood this will occur via a high court declaration.</p>	Seek that the whole of the submitter's submission and all relief sought be allowed unless otherwise stated or where they conflict with the Councils specific relief
Kāi Tahu ki Otago	Whole submission, except in relation to the provisions stated below	Support	<p>The submission points aid in improving the clarity of the PORPS and in giving effect to higher order documents and the RMA.</p> <p>It is noted that the submission opposes the entirety of the UFD chapter, while the Councils support them in part. The issues raised by the submitter for this chapter are supported by the Councils.</p>	Seek that the whole of the submitter's submission and all relief sought be allowed unless otherwise stated or where they conflict with the Councils specific relief
Te Rūnanga o Ngāi Tahu	Whole Submission, except in relation to the provision below	Support	The submission points aid in improving the clarity of the PORPS and in giving effect to higher order documents and the RMA.	Seek that the whole of the submitter's submission and all relief sought be allowed unless otherwise stated or where they conflict with the Councils specific relief

Waihōpai Rūnaka Te Rūnanga Ōraka Aparima Te Rūnanga o Awarua (0223)	Whole submission	Support	The submission points aid in improving the clarity of the PORPS and in giving effect to higher order documents and the RMA.	Seek that the whole of the submitter's submission and all relief sought be allowed unless otherwise stated or where they conflict with the Councils specific relief
Director General of Conservation (0137)	Whole submission	Support	<p>The relief sought aids in improving the clarity of the PORPS and in giving effect to higher order documents and the RMA.</p> <p>The Councils also note that the submitter seeks relief to retain much of the SRMR chapter, which the Councils have sought to be redrafted. In the event that provisions are not redrafted, retention of the chapter provisions is an alternative, excluding the specific relief sought by the Councils.</p>	Seek that the whole of the submitter's submission and all relief sought be allowed unless otherwise stated or where they conflict with the Councils specific relief.
	Relief relating to LF-FW-O8 and LF-LS- M13	Oppose	<p>Relief relating to LF-FW-O8, particularly that which refers to changes to flows and fish passage, is unclear and therefore will be difficult to implement. It does not provide guidance on how species interaction will be resolved, or when species would be considered undesirable.</p> <p>Relief relating to inserting 'indigenous' into LF-LS-M13 will remove scope for the provision to give effect to NPS-FM Policy 10.</p>	Disallow specific relief related to these provisions.
Central Otago Environmental Society (0202)	Whole submission	Support	The relief sought aids in improving the clarity of the PORPS and in giving effect to higher order documents and the RMA.	Seek that the whole of the submitter's submission and all relief sought be allowed unless otherwise stated or where they conflict with the Councils specific relief.

Greenpeace Aotearoa (0407)	Whole submission	Support	The relief sought aids in improving the clarity of the PORPS and in giving effect to higher order documents and the RMA.	Seek that the whole of the submitter's submission and all relief sought be allowed unless otherwise stated or where they conflict with the Councils specific relief.
Minister for the Environment (0136)	Whole submission	Support	The relief sought aids in improving the clarity of the PORPS and in giving effect to higher order documents and the RMA. An improved focus on water quantity and the resolution of over-allocation is appropriate for the Otago context, which has a history of water bodies suffering from extensive abstraction. Relief which seeks to clarify priority interpretations in provisions will assist to this end.	Seek that the whole of the submitter's submission and all relief sought be allowed unless otherwise stated or where they conflict with the Councils specific relief.
Adam Currie (10105)	Whole submission	Support	The PORPS would be improved in its ability to give effect to higher order documents if it more robustly regulated synthetic nitrogen fertiliser, promoted regenerative farming and clarified the implementation of Te Mana o te Wai.	Seek that the whole of the submitter's submission and all relief sought be allowed unless otherwise stated or where they conflict with the Councils specific relief.
Darryl Sycamore (0018)	Whole submission	Oppose	The relief sought is not consistent with higher order documents, nor the purpose and provisions in the PORPS.	Seek that the whole of the submitter's submission and all relief sought be disallowed unless otherwise stated or where they conflict with the Councils specific relief.
Andy Barratt (0309)	Whole submission	Support	The relief sought would assist in resolving natural resource issues identified within the PORPS and in giving effect to higher order documents.	Seek that the whole of the submitter's submission and all relief sought be allowed unless otherwise stated or where they conflict with the Councils specific relief.
Matakanui Gold Limited (0021)	Whole submission	Oppose	The relief sought is not consistent with higher order documents, nor the purpose and provisions in the PORPS.	Seek that the whole of the submitter's submission and all relief sought be disallowed unless otherwise stated or where they conflict with the Councils specific relief.
LAC Properties Trustees	Whole submission	Oppose	The Councils seek that decisions made give effect to the relevant higher order documents; and are consistent with the purpose and other provisions in the PORPOS.	Seek that the whole of the submitter's submission and all relief sought be disallowed unless otherwise stated or where they conflict with the Councils specific relief.

Limited (0211)				
Christchurch International Airport Limited (0307)	Whole submission	Oppose	Infrastructure must be managed within the PORPS in a manner that is consistent with the direction of higher order documents; and the purpose and other provisions of the PORPS. The relief sought by the submitter is not consistent with these matters. Particularly with respect to freshwater, infrastructure cannot be prioritised above the needs of water bodies and freshwater ecosystems, nor that of human health.	Seek that the whole of the submitter's submission and all relief sought be disallowed unless otherwise stated or where they conflict with the Councils specific relief.
Federated Farmers of New Zealand (0239)	Whole submission	Oppose	The relief sought is not consistent with higher order documents, nor the purpose and provisions in the PORPS.	Seek that the whole of the submitter's submission and all relief sought be disallowed unless otherwise stated or where they conflict with the Councils specific relief.
Contact Energy Limited (0318)	Whole submission	Oppose	The Councils are not opposed to renewable electricity generation (REG); however, the relief sought does not ensure that this must occur within environmental constraints, give effect to Part II of the RMA, seek not to operate within environmental limits and be consistent with the NPS-FM (particularly TMOTW) where relevant.	Seek that the whole of the submitter's submission and all relief sought be disallowed unless otherwise stated or where they conflict with the Councils specific relief.
Manuherekia Catchment Group (0116)	Whole submission	Oppose	The relief sought is not consistent with higher order documents, nor the purpose and provisions in the PORPS.	Seek that the whole of the submitter's submission and all relief sought be disallowed unless otherwise stated or where they conflict with the Councils specific relief.
Otago Water Resource Users Group (0235)	Whole submission	Oppose	The relief sought is not consistent with higher order documents, nor the purpose and provisions in the PORPS.	Seek that the whole of the submitter's submission and all relief sought be disallowed unless otherwise stated or where they conflict with the Councils specific relief.
Meridian Energy Limited (0306)	Whole submission	Oppose	The Councils are not opposed to renewable electricity generation (REG); however, the relief sought does not ensure that this must occur within environmental constraints, give effect to Part II of the RMA, seek not to operate within environmental limits and be consistent with the NPS-FM (particularly TMOTW) where relevant.	Seek that the whole of the submitter's submission and all relief sought be disallowed unless otherwise stated or where they conflict with the Councils specific relief.

Wise Response Society Inc (00509)	Whole submission	Support	The relief sought would assist in resolving natural resource issues identified within the PORPS and in giving effect to higher order documents. The Councils note that redrafting of some provisions may be necessary.	Seek that the whole of the submitter's submission and all relief sought be allowed unless otherwise stated or where they conflict with the Councils specific relief.
Trustpower Limited (0311)	Whole submission	Oppose	The Councils are not opposed to renewable electricity generation (REG); however, the relief sought does not ensure that this must occur within environmental constraints, give effect to Part II of the RMA, seek not to operate within environmental limits and be consistent with the NPS-FM (particularly TMOTW) where relevant.	Seek that the whole of the submitter's submission and all relief sought be disallowed unless otherwise stated or where they conflict with the Councils specific relief.
Port of Otago (0301)	Whole submission	Oppose	The relief sought is not consistent with higher order documents, nor the purpose and provisions in the PORPS.	Seek that the whole of the submitter's submission and all relief sought be disallowed unless otherwise stated or where they conflict with the Councils specific relief.

Specific Submission points

Submitter Name	Submission point number	Support or oppose	The reasons for my support / opposition are:	I seek that this part of the submission be allowed or disallowed
Alluvium Ltd and Stoney Creek Mining Ltd	00016.001	Oppose	<p>Providing for the listed activities where the resource exists does not recognise that the activity may not be appropriate in all such instances, in the context of higher order documents.</p> <p>Carrying over provisions from the previous RPS is opposed because the provisions must be consistent with the new, not old, RPS and there is now new policy direction which must be given effect to.</p>	Disallow
Aurora Energy Limited	00315.014	Oppose	This definition will not always be appropriate for the areas identified in order to give effect to higher order documents. For example, in some instances the adverse effects should be avoided, even where it is not practical. The Councils opposition is related also to the final application of the term, which may mean that the definition is too wide or restricted in scope.	Disallow
Aurora Energy Limited	00315.013	Oppose	The definition is unnecessary in the PORPS as the term is not used. If the term is incorporated into the PORPS, a definition may be useful.	Disallow
Aurora Energy Limited	00315.015	Oppose	The issues identified are not <i>significant</i> resource management issues for the region. While important, they should not be given prominence within this chapter.	Disallow
Aurora Energy Limited	00315.056	Oppose	To better give effect to higher order documents and the purpose and provisions of the PORPS, the provision should be not accepted or amended to include environmental considerations and limits.	Disallow

Aurora Energy Limited	00315.065	Oppose	The provision must recognise and work within environmental limits.	Disallow
Aurora Energy Limited	00315.081	Oppose	The relief sought is inconsistent with the purpose and other provisions of the PORPS and higher order documents.	Disallow
AWA	00502.006	Oppose	Efficiency must be defined as broader in scope, so that it also includes allocative and social efficiency and considers a full range of factors other than communities, including the environment.	Disallow
AWA	00502.004	Oppose	Giving effect to TMOTW may not provide for the factors listed by the submitter in every instance.	Disallow
AWA	00502.008	Oppose	While a new provision on the allocation of freshwater is not necessarily opposed, the relief sought is too restrictive to give effect to higher order documents.	Disallow
Beef & Lamb NZ and Deer Industry NZ	00237.074	Oppose	<p>In terms of water bodies, values must be identified via a Freshwater Management Unit (FMU) framework prior to limits being set. The Councils are open to this being adapted for other domains. However, the Councils note that a specific location need not be identified, apart from it being within the FMU. Not all values are easily tied to specific locations – for example swimming shouldn't be refined to a couple of water holes.</p> <p>The protection of productive land is supported; however, it should be more nuanced than simply to prioritise food and fibre production. Other uses of such land may be more appropriate, with ecosystems and biodiversity being the foremost priority.</p> <p>The inclusion of climate accounting methods is not necessarily opposed but should have an evidential basis, be cover a wide range of alternative methods and be placed in the appropriate planning document.</p>	Disallow

			<p>The agricultural industry creates a range of outcomes, both positive and negative. A biased focus on the positive aspects of the agricultural industry would be inaccurate and make it more difficult to give effect to higher order policy documents.</p> <p>The Councils support a foundation of resilience and biodiversity but note that further guidance is required. For example, is the resilience for the benefit of the environment or primary industry?</p>	
Beef & Lamb NZ and Deer Industry NZ	00237.006	Oppose	While the Councils are not necessarily opposed to defining the term, it opposes the relief without specific drafting. Depending on the wording used, the definition could aid or hinder the PORPS in giving effect to higher order documents.	Disallow
Beef & Lamb NZ and Deer Industry NZ	00237.023	Oppose	<p>REG activities are in a unique position of both having the ability to cause significant adverse effects and provide significant benefits in mitigating impacts of climate change. This trade off will need to be carefully managed in the PORPS, including by providing a local interpretation of and giving effect to higher order documents. Even so, the Councils submit that environmental limits and constraints must be applied.</p> <p>The primary sector is not in this unique position and the Councils submit there is no or limited scope in higher order documents to allow such permissive alternatives to addressing adverse effects – particularly offsetting or compensation.</p> <p>The PORPS, with amendments sought by the Councils, is sufficient to effectively regulate the activity.</p>	Disallow
Beef & Lamb NZ and Deer Industry NZ	00237.049	Oppose	This chapter has wider scope than the National Policy Statement referred to by the submitter. Furthermore ,the integrated nature of the PROPS means that simply deleting the chapter has significant consequential effects. The relief sought would not give effect to higher order documents.	Disallow
Beef & Lamb NZ and Deer Industry NZ	00237.056	Oppose	The Councils are not necessarily opposed to this concept but are unable to support the relief without first understanding the drafting sought.	Disallow

Beef & Lamb NZ and Deer Industry NZ	00237.066	Oppose	The relief sought is inconsistent with higher order documents.	Disallow
Calder Stewart	00027.003	Oppose	There is no objective or policy support for the relief proposed within the PORPS, meaning it will be contradictory to the document. This relief is better sought within the LWRP.	Disallow
Calder Stewart	00027.004	Oppose	The Councils are not necessarily against the inclusion of a provision encouraging best practice; however, it is not clear that the ECO chapter is the appropriate place for it.	Disallow
Canterbury Regional Council (Environment Canterbury)	0013.008	Support	The relief sought is consistent with the purpose and other provisions of the PORPS and higher order documents.	Allow
Canterbury Regional Council (Environment Canterbury)	0013.009	Support		Allow
Canterbury Regional Council (Environment Canterbury)	0013.016	Support		Allow
Central Otago Environmental Society	00202.012	Support	The relief sought would dramatically improve Otago's ability to mitigate its contribution to climate change.	Allow

Central Otago Winegrowers Association	00302.001	Oppose	The Council does not necessarily oppose the PORPS providing guidance on engagement; however, it should do so with the whole community in a holistic fashion, not with one segment of the whole.	Disallow
Chorus, New Zealand Limited, Spark New Zealand Trading Limited and Vodafone New Zealand	00310.003	Oppose	The issues identified are not <i>significant</i> resource management issues for the region. While important, they should not be given prominence within this chapter.	Disallow
Christchurch International Airport Limited (CIAL)	00307.043	Oppose	Works on infrastructure, and the development of infrastructure, must occur within environmental limits. This is not recognized within the relief sought. Adoption of the relief would make it more difficult to give effect to higher order planning documents.	Disallow
Christchurch International Airport Limited (CIAL)	00307.041	Oppose	Regardless of the constraints or satisfactory regimes identified by the submitters, the provisions must still give effect to higher order documents and be consistent with other provisions within the PORPS, including those which prioritise aspects of the environment.	Disallow
Contact Energy Limited	00318.008	Oppose	The Councils are not opposed to renewable electricity generation (REG) being recognised as a response to climate change. However, this relief does not consider that this must occur within environmental constraints. This is critical to giving effect to higher order documents, such as the NPS-FM.	Disallow
Cosy Homes Charitable Trust	00242.001	Oppose	The issues identified are not <i>significant</i> resource management issues for the region. While important, they should not be given prominence within this chapter.	Disallow

Director-General of Conservation	00137.005	Support	All crown agencies of relevance should be listed, including Fish and Game Councils.	Allow
Dunedin City Council	00139.002	Oppose	<p>The PORPS should shape future planning and council action, including developing alternatives from currently planned ones if necessary. It is inconsistent with higher order documents for current work programmes to dictate outcomes for the PORPS.</p> <p>It is not clear who should be involved in the mutual agreement to change dates in the PORPS that is sought by the submitter. The document requires public input to be developed. It would not be acceptable for the public to be excluded from future amendments.</p>	Disallow
Dunedin City Council	00139.113	Support	The Councils support the inclusion of such a definition, or words to similar effect, provided the word is used within the provisions of the PORPS, as it will aid with interpretation.	Allow
Dunedin City Council	00139.127	Support	The Councils support the inclusion of such a definition, or words to similar effect, provided the word is used within the provisions of the PORPS, as it will aid with interpretation.	Allow
Dunedin City Council	00139.114	Support	The Councils support the inclusion of such a definition, or words to similar effect.	Allow
Dunedin City Council	00139.005b	Support	The relief will aid in the interpretation of the PORPS. The Councils are open to wording to similar effect.	Allow
Dunedin City Council	00139.110	Oppose	The definition is unnecessary in the PORPS as the term is not used. If the term is incorporated into the PORPS, a definition may be useful.	Disallow
Dunedin City Council	00139.109	Oppose	The definition is unnecessary in the PORPS as the term is not used. If the term is incorporated into the PORPS, a definition may be useful.	Disallow
Dunedin City Council	00139.111	Support	The PORPS interpretation would be improved with a definition for this term	Allow

Dunedin City Council	00139.005a	Support	The Councils support a definition to improve the use of the term, noting that provisions using this term are likely benefited by instead using the term 'water bodies'.	Allow
Dunedin City Council	00139.014	Oppose	The issues identified are not <i>significant</i> resource management issues for the region. While important, they should not be given prominence within this chapter.	Disallow
Dunedin City Council	00139.048	Support	Clarity and consistency between policies in the PORPS will aid in its effectiveness and implementation.	Allow
Dunedin City Council	00139.135	Support	The relief sought will improve the integrated nature of the plan and better address the wildling pine issue in Otago.	Allow
Dunedin City Council	00139.079	Support	This relief should be adopted to the PORPS to the extent that this can be accommodated while giving effect to higher order documents, as it will improve the effectiveness and integrated nature of the statement.	Allow
Dunedin City Council	00139.145	Support	The provision will aid in interpretation of the PORPS.	Allow
Dunedin City Council	00139.178	Support	The interpretation of the PORPS will be improved by the relief sought.	Allow
Dunedin City Council	00139.225	Support	The sought relief will aid in giving effect to higher order documents and managing issues identified within the PORPS.	Allow
Dunedin City Council	00139.249	Oppose	<p>Matters 2 and 3 are not appropriate approaches to drafting provisions in the PORPS. Because:</p> <ul style="list-style-type: none"> - any provisions listed must be consistent with the purpose and other provisions of the PORPS and higher order documents; and - district plans must give effect to the PORPS, so it is inappropriate for a district plan to dictate provisions of the PORPS. 	Disallow

			The Councils are open to drafting to make the provisions more efficient, including in the way identified by the submitter, provided the provisions are consistent with the above statements. .	
Environmental Justice Ōtepoti	00203.001	Support	The sought relief will aid in giving effect to higher order documents and managing issues identified within the PORPS.	Allow
Environmental Justice Ōtepoti	00203.002	Support		Allow
Environmental Justice Ōtepoti	00203.003	Support		Allow
Environmental Justice Ōtepoti	00203.004	Support		Allow
Environmental Justice Ōtepoti	00203.005	Support		Allow
Ernslaw One	00412.010	Oppose	It is expected that the LWRP process will require an evidential basis, a section 32 Analysis and community consultation.	Disallow
Ernslaw One	00412.013	Oppose	Forestry creates a range of outcomes, both positive and negative. The biased focus on the positive aspects of forestry would be inaccurate and make it more difficult to give effect to higher order policy documents.	Disallow
Ernslaw One	00412.008	Oppose	It is appropriate to deal with these issues together.	Disallow

Federated Farmers of New Zealand	00239.194	Oppose	The PORPS is an integrated document and many chapters will be required to give effect to the National Policy Statement for Freshwater Management 2020 (NPS-FM), among other National Policy Statements. This is not going beyond the intent of the policy statement. In addition, a similar hierarchy can be used to give effect to the sustainable management of natural resources promoted by the RMA and its many national policy statements. It has merit being adopted to topics outside of freshwater.	Disallow
Federated Farmers of New Zealand	00239.195	Oppose	The directive approach of the PORPS, including relief sought by the Councils, is required to give effect to higher order documents.	Disallow
Federated Farmers of New Zealand	00239.201	Oppose	The PORPS as notified already accommodates long timeframes for transitions. The Councils note that these already weaken the ability to give effect to higher order documents in a timely manner. The detail of transitions are best dealt with via the LWRP.	Disallow
Federated Farmers of New Zealand	00239.197	Oppose	The agricultural industry creates a range of outcomes both positive and negative. A biased approach towards the positive would be inaccurate and make it more difficult to give effect to higher order policy documents.	Disallow
Federated Farmers of New Zealand	00239.192	Support	This relief will assist with the interpretation of the statement.	Allow
Federated Farmers of New Zealand	00239.200	Oppose	The relief sought would weaken the integrated approach of the PORPS, particularly because effects from water quantity and quality alteration are intertwined. The higher order documents would be best given effect to with flow setting provisions linked with others relating to freshwater.	Disallow
Federated Farmers of New Zealand	00239.075	Oppose	The relief sought is contrary to higher order documents, particularly the concept of TMOTW.	Disallow
Federated Farmers of New Zealand	00239.180	Support	The relief sought is consistent with the purpose and other provisions of the PORPS and higher order documents.	Allow

Federated Farmers of New Zealand	00239.184	Oppose	The relief sought is inconsistent with higher order documents.	Disallow
Fonterra Co – operative Group Limited	00213.003	Oppose	Growth and development will not always be appropriate in the context of higher order documents or to resolve natural resource issues in Otago.	Disallow
Fonterra Co – operative Group Limited	00213.006	Oppose	The definition is restrictive in scope and unclear.	Disallow
Fonterra Co – operative Group Limited	00213.018	Oppose	The issues identified are not <i>significant</i> resource management issues for the region. While important, they should not be given prominence within this chapter.	Disallow
Fonterra Co – operative Group Limited	00213.022	Oppose	The PORPS, with amendments sought by the Councils, is sufficient to effectively deal with the issue raised by the submitter.	Disallow
Fonterra Co-operative Group Limited	00213.038	Support	Clarity as sought in the relief may assist in interpreting the PORPS.	Allow
Fulton Hogan Limited	00322.047	Oppose	Extracting aggregate, mining industry behind the activity, creates a range of outcomes, both positive and negative. To focus on the positive only would be inaccurate and make it more difficult to give effect to higher order policy documents.	Disallow
Fulton Hogan Limited	00322.048	Oppose	The Councils are sympathetic to the issue of reverse sensitivity. However, the relief sought is too broad. It is overly restrictive for incompatible land uses to be disallowed from establishing near any valuable aggregate resource, regardless of if it is being currently extracted or not.	Disallow
Fulton Hogan Limited	00322.001	Support	The relief will aid in the interpretation of the PORPS. The Councils are open to wording to similar effect.	Allow

Fulton Hogan Limited	00322.004	Oppose	The issues identified are not <i>significant</i> resource management issues for the region. While important, they should not be given prominence within this chapter.	Disallow
Fulton Hogan Limited	00322.008	Oppose	The provisions of the PORPS, with amendments sought by the Councils, is already sufficient to achieve the outcome of this provision.	Disallow
Fulton Hogan Limited	00322.018	Oppose	The Councils are not necessarily opposed to the PORPS providing more guidance on the implementation of TMOTW; however, they feel the approach of the submitter is unnecessary.	Disallow
Fulton Hogan Limited	00322.034	Oppose	The Councils are not necessarily opposed to the concept but oppose the insertion of a whole new provision, as opposed to integrating the concept elsewhere.	Disallow
Highton, John	00014.011	Support	Provisions to address these issues would aid in improving the effectiveness of the PORPS and subsequent plans to regulate environmental protection and access.	Allow
Highton, John	00014.043	Support	The Councils agree that the PORPS would better give effect to higher order documents if valued introduced species and their habitats were recognised, and in the case of the latter protected. This is particularly relevant to the habitat of trout and salmon.	Allow
Highton, John	00014.016	Support	The relief will assist in giving effect to higher order documents in linking health needs with food harvesting. The Councils note that this is an issue affecting a range of people wider than those represented by iwi authorities.	Allow
Hopkins, Jim	00420.023	Support	Amending the PORPS to include a directive approach to managing topics of productive soils loss and carbon forestry/sequestration is supported as a means to give effect to higher order documents. In dry catchments, the conversion to carbon forestry planting requires additional regulation within the PORPS, particularly with respect to impacts on catchment yield.	Allow
Hopkins, Jim	00420.013	Support	Comprehensive regulation of carbon forestry is required in order to give effect to the purpose of the PORPS and higher order documents.	Allow

Horticulture New Zealand	00236.001	Oppose	<p>Giving effect to higher order policy documents will require rationalising and prioritising the four well-beings. 'Providing for' each without further guidance is not possible, as providing for one (in the maximum sense) can impact on another.</p> <p>The agricultural industry creates a range of outcomes, both positive and negative. Acknowledging the serious issue of mental health within the community, a biased focus on the positive aspects of the agricultural industry would be inaccurate and make it more difficult to give effect to higher order policy documents.</p>	Disallow
Horticulture New Zealand	00236.002	Oppose	The Councils submit that food production is not a second-tier consideration in the hierarchy of obligations and should not be carried through as such in other prioritisation provisions in the PORPS.	Disallow
Horticulture New Zealand	00236.003	Oppose	The PORPS must give effect to a wide range of higher order documents. It will not be true in all cases that the relief the submitter seeks will be appropriate. For example, improved water storage must only occur within the context of TMOTW.	Disallow
Horticulture New Zealand	00236.011	Oppose	The physical needs of humans are wider than the relief the submitter seeks.	Disallow
Horticulture New Zealand	00236.029	Oppose	The issues identified are not <i>significant</i> resource management issues for the region. While important, they should not be given prominence within this chapter.	Disallow
Horticulture New Zealand	00236.033	Oppose		Disallow
Horticulture New Zealand	00236.047	Oppose	The Councils don't necessarily oppose the intent; however, further drafting is needed to make the provision's direction clear to readers.	Disallow
Horticulture New Zealand	00236.042	Oppose	The provision is unnecessarily restricted to 'significant' and 'localised' adverse effects only.	Disallow
Kramer, Mark	00417.001	Oppose	The PORPS provisions are adequate to regulate suction dredging activities in the	Disallow

			LWRP.	
LAC Properties Trustees Limited	00211.009	Oppose	The Councils oppose the addition of provisions which will discuss the benefits of the use and development of natural resources or the environment without discussion of environmental limits/constraints and how users will contribute to upholding the health of the environment. Provisions which approach the issues in this holistic way will better give effect to higher order documents.	Disallow
LAC Properties Trustees Limited	00211.010	Oppose	The Councils submit that the PORPS is able to go beyond national regulations in order to resolve environmental issues in the region.	Disallow
LAC Properties Trustees Limited	00211.036	Oppose	The Councils submit that avoid tests are appropriate in certain instances to give effect to higher order documents. All avoid references should not be deleted unless they are inconsistent with the PORPS and higher order documents.	Disallow
Lane, Hocking	00210.016	Oppose	A past improvement does not always give effect to the direction of higher order documents. The relief sought will not aid to that end.	Disallow
Maryhill Limited	00118.003	Oppose	Clarity on the legal status of the provisions within the PORPS may be useful. Some of the provisions identified by the submitter, methods for example, are relevant to other planning documents.	Disallow
Maryhill Limited	00118.015	Oppose	The relief sought is inconsistent with the purpose and other provisions of the PORPS and higher order documents.	Disallow
Maryhill Limited	00118.067	Oppose	The relief is vague, in that it is not clear what appropriate diversification means or what criteria will be used to assess it. Any new provisions must give effect to higher order documents and be consistent with the purpose and provisions of the PORPS.	Disallow
Matakanui Gold Limited	00021.003	Oppose	The provisions within the RPS adequately cover this activity.	Disallow

Matakanui Gold Limited	00021.004	Support	A definition of this term would aid in interpretation of the PORSP. The Councils would consider wording to similar effect.	Allow
McArthur Ridge Vineyard Ltd	00403.002	Oppose	The Councils do not oppose encouragement to switch to more appropriate land uses within the PORPS; however, this should be accompanied by guidance also on the size and scale of that industry or the resources used.	Disallow
McArthur Ridge Vineyard Ltd	00403.003	Support	The Councils agree that additional guidance on resolving over-allocation, reducing allocation or re-allocating freshwater would be helpful in the PORPS given the severe water allocations in the region.	Allow
Meridian Energy Limited	00306.088	Oppose	The Councils oppose the addition of provisions which will discuss the benefits of the use and development of natural resources or the environment without discussion of environmental limits/constraints and how users will contribute to upholding the health of the environment. Provisions which approach the issues in this holistic way will better give effect to higher order documents.	Disallow
Meridian Energy Limited	00306.089	Oppose		Disallow
Meridian Energy Limited	00306.018	Oppose	The Councils are not opposed to renewable electricity generation (REG) being recognised as a response to climate change. However, this relief does not consider that this must occur within environmental constraints. This is critical to giving effect to higher order documents, such as the NPS-FM.	Disallow
Meridian Energy Limited	00306.041	Oppose	The chapter deals with more than indigenous biodiversity. In addition, this chapter is the logical place to address NPS-FM Policies 9 and 10, which are inherently <i>ecosystem</i> concerns.	Disallow
Mt Cardrona Station	00014.067	Oppose	The relief is vague, in that it is not clear what appropriate diversification means or what criteria will be used to assess it. Any new provisions must give effect to higher order documents and be consistent with the purpose and provisions of the PORPS.	Disallow

New Zealand Infrastructure Commission	00321.009	Support	The Councils support further clarification of the hierarchy in the PORPS to better give effect to higher order documents. The Councils submit that this should prioritise ecosystems and biodiversity.	Allow
New Zealand Infrastructure Commission	00321.102	Oppose	The relief is phrased as an either or statement. The Councils submit that both can occur together, and that this must be done to give effect to higher order documents. Further clarity in the PORPS on this point may be beneficial.	Disallow
New Zealand Infrastructure Commission	00321.103	Oppose	The Councils are not opposed to exploring methods of ensuring fairness within the ECO provisions; however, the ability of such a framework to give effect to higher order documents and be consistent with the provisions of the PORPS will rely heavily on the drafted wording, which has not yet been proposed.	Disallow
New Zealand Infrastructure Commission	00321.104	Oppose	The relief sought is inconsistent with the purpose and other provisions of the PORPS and higher order documents.	Disallow
New Zealand Infrastructure Commission	00321.002	Oppose		Disallow
New Zealand Infrastructure Commission	00321.100	Oppose		Disallow
New Zealand Infrastructure Commission	00321.104	Oppose		Disallow
New Zealand Infrastructure Commission	00321.042	Oppose		Disallow

New Zealand Infrastructure Commission	00321.044	Oppose		Disallow
New Zealand Infrastructure Commission	00321.045	Oppose		Disallow
New Zealand Infrastructure Commission	00321.046	Oppose		Disallow
New Zealand Infrastructure Commission	00321.051	Oppose		Disallow
New Zealand Infrastructure Commission	00321.055	Oppose		Disallow
New Zealand Infrastructure Commission	00321.065	Oppose		Disallow
New Zealand Pork Industry Board	00240.033	Oppose	The integrated approach of the RPS is the best way to give effect to the higher order documents and the relief suggested by the submitter will reduce the effectiveness of the approach. A focus on the activity and theme areas is preferable to one based on the zone an activity is situated in.	Disallow
New Zealand Pork Industry Board	00240.025	Support	A definition of this term would aid in interpretation of the PORSP. The Councils would consider wording to similar effect.	Allow

Oceana Gold (New Zealand) Ltd	00115.035	Oppose	The approach of the PORPS, including relief sought by the Councils, is the best approach to give effect to higher order documents.	Disallow
Oceana Gold (New Zealand) Ltd	00115.007	Oppose	<p>The mining industry creates a range of outcomes both positive and negative. A biased approach towards on the positive would be inaccurate and make it more difficult to give effect to higher order policy documents.</p> <p>It is not appropriate for one operation to be singled out in the way the submitter is seeking.</p> <p>The provisions of mining in Otago, with the points listed by the submitter, is too blunt. Mining may not be an activity which should be provided for or enabled in every instance. The activity must occur within environmental limits.</p> <p>However, the Councils are sympathetic to the idea of recognising the finite nature of minerals, as this is an inherent environmental constraint.</p>	Disallow
Oceana Gold (New Zealand) Ltd	00115.036	Oppose	The PORPS policies, with amendments sought by the Councils, are adequate for the regulation of the industry.	Disallow
Oceana Gold (New Zealand) Ltd	00115.006	Oppose	The issues identified are not <i>significant</i> resource management issues for the region. While important, they should not be given prominence within this chapter.	Disallow
Otago Rock Lobster Industry Association Inc and Pauamac 5 Incorporated	00125.001	Support	This issue has been poorly managed in the past and an improved focus will assist with giving effect to higher order documents,	Allow

Otago Rock Lobster Industry Association Inc and Pauamac 5 Incorporated	00125.002	Support	Broadening the integrated management approach would be an avenue to better give effect to higher order documents.	Allow
Otago Rock Lobster Industry Association Inc and Pauamac 5 Incorporated	00125.006	Support	It is not clear whether this relief can be incorporated into the PORPS but if it were, the Councils support its development.	Allow
Otago Rock Lobster Industry Association Inc and Pauamac 5 Incorporated	00125.003	Support	The Councils support a further focus on the relationships between adverse effects in the coastal marina area (CMA) and actions taken on land. The Councils understand that an evidential basis will already required for relief to be accepted on the PORPS and subsequent LWRP.	Allow
OWRUG	00235.004	Oppose	It will not be appropriate to recognise and prioritise all land used for food and fibre production. The provisions, with amendments sought by the Councils, is adequate to give effect to higher order documents.	Disallow
OWRUG	00235.008	Oppose	The provisions in the PORPS, with amendments sought by the Councils, are adequate to give effect to higher order documents without the submitter's relief.	Disallow
OWRUG	00235.058	Oppose	The issues identified are not <i>significant</i> resource management issues for the region. While important, they should not be given prominence within this chapter.	Disallow
OWRUG	00235.003	Oppose	While the Councils do not necessarily oppose the concept of providing guidance on timeframes to achieve the visions in the PORPS, they do oppose the scope of the	Disallow

			timeframes being restricted to the points listed by the submitter. This would fail to give effect to higher order documents.	
OWRUG	00235.086	Oppose	This chapter must give effect to TMOTW, which does include a balance but one which is weighted towards the environment. The relief sought is inconsistent with the concept of TMOTW and the NPS-FM.	Disallow
OWRUG	00235.097	Oppose	The relief sought is too restrictive to properly implement the PORPS and higher order documents. For example, it would preclude other provisions within the PORPS from being considered in setting limits.	Disallow
Port Blakely NZ Ltd	00033.005	Oppose	Forestry creates a range of outcomes, both positive and negative. The biased focus on the positive aspects of forestry would be inaccurate and make it more difficult to give effect to higher order policy documents. The Councils are open to provisions to provide further guidance on carbon forestry and sequestration.	Disallow
PowerNet Ltd	00511.032	Oppose	The PORPS, with relief sought by the Councils, already allows infrastructure development in certain situations.	Disallow
PowerNet Ltd	00511.033	Oppose	It is not clear what 'unnecessarily impeded' means in the context of the relief.	Disallow
Pritchard, Christopher	00003.001	Oppose	The provisions sought are not consistent with higher order documents.	Disallow
Pritchard, Christopher	00003.002	Oppose	The provisions sought are not consistent with higher order documents.	Disallow
Queenstown Airport Corporation	00313.037	Oppose	<p>The Councils submit that consistency with the previous RPS is not reason to draft provisions, the key concerns should be giving effect to higher order documents and resolving issues in the region.</p> <p>The PORPS, with the relief sought by the Councils, provides adequately for the infrastructure of concern to the submitter. There are a number of bespoke provisions, or limbs within wider provisions, that deal with the infrastructure in question. Greater permissiveness will not aid in giving effect to higher order documents.</p>	Disallow

Queenstown Airport Corporation	00313.039	Oppose	The relief sought is inconsistent with the purpose and other provisions of the PORPS and higher order documents.	Disallow
Queenstown Lakes District Council	00138.205	Oppose	While the Councils are not necessarily opposed to defining the term, it is used in more contexts than housing in the PORPS.	Disallow
Queenstown Lakes District Council	00138.028	Oppose	The proposed definition does not adequately address Policy 10 of the NPS-FM.	Disallow
Queenstown Lakes District Council	00138.027	Support	A definition of this term would aid in interpretation of the PORSP. The Councils would consider wording to similar effect.	Allow
Queenstown Lakes District Council	00138.048	Support	Additional guidance in this area will assist in resolving water quantity issues and giving effect to higher order documents.	Allow
Queenstown Lakes District Council	00138.081	Oppose	The relief sought is not consistent with the NPS-FM or TMOTW.	Disallow
Queenstown Lakes District Council	00138.039	Oppose	The Councils do not necessarily oppose a provision guiding carbon sequestration; however the relief sought is too restricted in scope. It should at the least cover both ecosystems and biodiversity.	Disallow
Raynoir Matarki Forests	00020.001	Oppose	The PORPS should not be delayed. The current RPS has been identified as being deficient and LWRP requires a functional RPS that gives effect to the NPS-FM 2020 before it can be written. Delay will impact the LWRP development, which will in turn delay the achievement of central government policy direction.	Disallow
Raynoir Matarki Forests	00020.002	Support	Provisions encouraging the planting of indigenous vegetation may assist in giving effect to higher order documents. For example, re-establishing tussock is linked to restorations in catchment yield.	Allow

Sanford Ltd.	00122.007	Oppose	This objective is inappropriate in the context of other provisions in the PROPS, particularly those related to integrated management.	Disallow
Sanford Ltd.	00122.024	Oppose	The integrated nature of the PORPS means that the ECO chapter <i>must</i> apply to all other chapters in order for the plan to achieve the intended outcomes.	Disallow
Shaping Our Future	00013.002	Oppose	The Councils are not opposed to catchment scale management plans; however, they should be implemented across the region. This may assist in giving effect to higher order documents.	Disallow
Shaping Our Future	00013.003	Oppose	While the Councils are not opposed to this, it will occur to some extent via the FMU processes in the LWRP. It is not necessary to state it explicitly in additional provisions.	Disallow
Shaping Our Future	00013.005	Support	This relief will aid in giving effect to higher order documents. The Councils note that relief it seeks in the ECO chapter will assist in implementing this relief.	Allow
Skinner, Evelyn	00317.003	Support	The relief sought will aid in resolving environmental issues identified within the PORPS and in giving effect to higher order documents.	Allow
Sole Matthew	00508.002	Support	This relief will assist in giving effect to higher order documents, particularly with the integrated management focus of the PORPS.	Allow
Sole Matthew	00508.003	Support	This relief will assist in giving effect to higher order documents, particularly with the integrated management focus of the PORPS.	Allow
Sole Matthew	00508.004	Support	Providing directive wording in replacement of the words identified by the submitter will aid giving effect to higher order documents.	Allow
Sole Matthew	00508.008	Support	The provision will aid in giving effect to higher order documents.	Allow
Sole, Matthew	00508.007	Support	Non-indigenous species are a part of ecosystems and their protection can aid in giving effect to higher order documents and the purpose of the PORPS. The Councils are particularly interested in how the PORPS gives effect to NPS-FM Policy 10.	Allow

Stewart, Lynne	00030.007	Support	The relief sought will aid in interpretation of the PORPS, including amendments sought by the Councils, which includes provision for the use of the precautionary principle.	Allow
Strath Clyde Water Ltd, McArthur Ridge Investment Group Ltd & Mount Dunstan Estates Ltd	00404.001	Support	Additional guidance on the manner in which primary sector producers, being a significant proportion of water abstraction in Otago, will access water would be beneficial to giving effect to higher order documents. The Councils note that this should not take the form of providing for consumptive uses but more helpfully to what degree consumptive uses must adapt to environmental constraints.	Allow
Thomson Chris	00215.001	Oppose	The relief sought is inconsistent with the purpose and other provisions of the PORPS and higher order documents.	Disallow
Toitū Te Whenua, Land Information New Zealand	00101.063	Oppose	The Councils note that this is dealt with under other legislation.	Disallow
Toitū Te Whenua, Land Information New Zealand	00101.033	Support	The Councils support this relief as it will aid in the effective implementation of the PORPS. The Councils also note that Fish and Game Councils are part of the Crown and interpret this relief as applying to them also.	Allow
Toitū Te Whenua, Land Information New Zealand	00101.022	Support	The Councils submit that the relief sought will assist in giving effect to higher order documents.	Allow
Transpower New Zealand Limited	00314.031	Oppose	The relief sought is inconsistent with the purpose and other provisions of the PORPS and higher order documents.	Disallow

Transpower New Zealand Limited	00314.038	Oppose		Disallow
Transpower New Zealand Limited	00314.057	Oppose		Disallow
Transpower New Zealand Limited	00314.058	Oppose		Disallow
Transpower New Zealand Limited	00314.048	Oppose		Disallow
Trojan Holdings Limited (Trojan)	00206.004	Support	Providing directive wording in replacement of the words identified by the submitter will aid giving effect to higher order documents.	Allow
Trojan Holdings Limited (Trojan)	00206.001	Oppose	The Councils are not necessarily opposed to the insertion of provisions relating to human well-being but oppose it being limited to the factors sought by the submitter. The Councils oppose the relief subject to review of provision drafting proposed by the submitter.	Disallow
Trojan Holdings Limited (Trojan)	00206.013	Oppose	The definition is unnecessary in the PORPS as the term is not used. If the term is incorporated into the PORPS, a definition may be useful.	Disallow
Trojan Holdings	00206.078	Oppose	The Councils are sympathetic to the exploration of the benefits of people accessing and using the rural and natural environment; however, it opposes the relief until provision drafting is provided. The use of the phrase "subdivision, use and development" could	Disallow

Limited (Trojan)			direct provision drafting that is either consistent or inconsistent with higher order documents; and the purpose and other provisions of the PORPS.	
Trojan Holdings Limited (Trojan)	00206.032	Support	The provision will assist with giving effect to higher order documents.	Allow
Universal Developments Hawea Limited	00209.009	Oppose	The Councils oppose the addition of provisions which will discuss the benefits of the use and development of natural resources or the environment without discussion of environmental limits/constraints and how users will contribute to upholding the health of the environment. Provisions which approach the issues in this holistic way will better give effect to higher order documents.	Disallow
Waitaki District Council	00140.002	Support	Submitters have sought relief relating to carbon forestry or related activities. The Councils support inclusion of a definition to support this as it will aid in interpretation. The Councils would support wording to similar effect.	Allow
Waitaki Irrigators Collective Limited	00213.015	Support	The PORPS interpretation would be improved with a definition for this term and guidance on how it relates to limits.	Allow
Waitaki Irrigators Collective Limited	00213.001	Oppose	The relief is inconsistent with higher order documents.	Disallow
Waka Kotahi NZ Transport Agency	00305.005	Support	The relief will aid in the interpretation of the PORPS. The Councils are open to wording to similar effect.	Allow
Wayfare Group Ltd	00411.004	Support	Water allocation is a serious issue in Otago and additional guidance on how water is allocated between competing uses may be of benefit to giving effect to higher order	Allow

			documents. The Councils interpret this relief as including environmental uses and other instream uses.	
Wayfare Group Ltd	00411.005	Support	The Councils support additional guidance on this issue, noting that priority must be afforded to the health and well-being of the water body.	Allow
Wayfare Group Ltd	00411.006	Support	The Councils support additional guidance on this issue and has a keen interest in which species would be included in such regulation.	Allow
Wayfare Group Ltd	00411.100	Support	The Councils support the inclusion of such a definition, or words to similar effect, provided the word is used within the provisions of the PORPS, as it will aid with interpretation.	Allow
Wayfare Group Ltd	00411.017	Support	The relief will aid in the interpretation of the PORPS. The Councils are open to wording to similar effect.	Allow
Wayfare Group Ltd	00411.016	Support	The provision will aid in interpretation of the plan and giving effect to higher order documents.	Allow
Wayfare Group Ltd	00411.109	Support		Allow
Wayfare Group Ltd	00411.117	Support		Allow
Wayfare Group Ltd	00411.123	Support		Allow
Wayfare Group Ltd	00411.126	Support		Allow
Wayfare Group Ltd	00411.040	Support		Allow

Wayfare Group Ltd	00411.044	Support		Allow
Wayfare Group Ltd	00411.050	Support		Allow
Wayfare Group Ltd	00411.053	Support		Allow
Wayfare Group Ltd	00411.054	Support		Allow
Wayfare Group Ltd	00411.135	Support		Allow
Wayfare Group Ltd	00411.137	Support		Allow
Yellow – eyed Penguin Trust	00120.004	Support	The relief sought is will aid in giving effect to higher order documents and the purpose of the PORPS.	Allow
Yellow-eyed Penguin Trust	00120.006	Support	This relief will assist with giving effect to higher order documents.	Allow
Yellow-eyed Penguin Trust	00120.027	Support	Inclusion of the sought provisions would improve the efficacy of the PORPS in giving effect to higher order documents.	Allow
Yellow-eyed Penguin Trust	00120.049	Support	The proposed policy will assist with the integrated management of sedimentation in the region.	Allow
Yellow-eyed Penguin Trust	00120.005	Support	Direction to this end will aid in giving effect to higher order policy documents.	Allow