

**In the matter of
and**

The Resource Management Act 1991

**The proposed Regional Policy
Statement for Otago**

In the matter of

**a submission by the Central Otago
District Council**

STATEMENT OF EVIDENCE OF ANN RODGERS

23 NOVEMBER 2023

QUALIFICATIONS AND EXPERIENCE

1. My name is Ann Fiona Rodgers.
2. I hold a Master of Regional and Resource Planning (MRRP) from Otago University. I am a Member of the New Zealand Planning Institute. I am currently employed as Principal Policy Planner at Central Otago District Council (CODC).
3. I have worked in New Zealand as a planner, planning manager and policy professional for central government agency, private consultancy and local authorities, 26 for years, in all aspects of Resource Management Act (RMA) planning, growth planning, community engagement and spatial planning processes.
4. My planning experience includes both resource management policy development and implementation. I have developed and drafted district plans, led spatial planning processes, prepared national and regional planning and policy submissions and processed resource consent applications.
5. I have been employed by CODC since December 2020 in my current position but have been employed by CODC including managing the planning team for a total of sixteen years since 2003.
6. I confirm that I have read the 'Code of Conduct for Expert Witnesses' contained in the Environment Court Consolidated Practice Note 2014 and I agree to comply with it. I have complied with it in the preparation of this statement of evidence.

SCOPE OF EVIDENCE

7. I prepared the submission for the Central Otago District Council.
8. The Section 42A reporting has been provided chapter by chapter and I will structure my evidence accordingly.
9. In my evidence I will discuss the following in the context of the CODC submission:
 - Integrated Management
 - Air
 - Land and Fresh Water
 - Land and Soil

INTEGRATED MANAGEMENT

10. The CODC supports the management of natural and physical resources in a cross jurisdictional way where possible reflecting that natural and physical environment rather than Local Government jurisdictional boundaries.
11. The CODC supports the recommendation in the section 42A Hearing Report in relation to IM-P7 to remove specific reference to Otago and include reference to the environment. The recommendation reflects a recognition that the cross-boundary management of natural and physical resources should not be limited to Otago.
12. Cross boundary management of natural and physical resources extends beyond the jurisdictional boundaries of regional and district councils.
13. In its submission the CODC supported IM-P9 in principle but raised concerns regarding the timeframe and achievability of the timeframe set in the policy for communities to have established a response.
14. The CODC supports the recommendation in the section 42A Hearing Report in relation to IM-P9 to remove the policy, in favour of amendments to IM-04 that reflect a link to achieving national targets.

AIR

15. The Central Otago District has towns that are identified as having poor ambient air quality. Currently three of the four towns identified as Air Zone 1 are located in the District (Cromwell, Alexandra and Clyde).
16. Central Otago experiences some of the coldest temperatures in the country during winter months, experiencing temperatures that are on average lower than over the rest of the country with frosts and snowfalls occurring frequently during the year. ¹
17. Some of the housing stock in Air Zone 1 town is older dwellings with limited insulation. Heating of older housing stock can be challenging and cost prohibitive for residents.
18. In an ideal world all homes would be full insulated with double glazing, making them easier to heat but for some communities in Central Otago that is not the reality.
19. Older housing stock requires significant upgrades or significant heating to maintain a warm and healthy home environment in a Central Otago Winter.
20. Working towards phasing out of solid fuel wood burners needs to be coupled with an affordable alternative that meets the needs of the community in terms of effectiveness and affordability.

¹ [Otago Climate book WEB 2021.pdf \(niwa.co.nz\)](#)

21. Costs associated with upgrading of older housing stock to a level that would enable electricity as a reliable and affordable means of heating in winter months is cost prohibitive for many residents in Central Otago.
22. Of particular concern to CODC is the prospect of residents not having access to affordable heating options during winter months and the potential significant impact on the health and wellbeing of the community if they are forced to turn of heating in winter months.
23. The burning of wood has been the default for affordable and effective means of heating in Central Otago for decades, with families often supporting each other with the supply of fuel for the fires.
24. The timing for phasing out of non-complying solid fuel wood-burners has the potential to adversely affect the health of communities who may not be able to replace their heating or have an ability to fund the on-going costs of any replacements.
25. CODC in its submissions supports in principle a review of the airshed areas to consider development areas and weather patterns, provided the review is undertaken in consultation with territorial authorities and other stakeholders.

LAND AND FRESH WATER

26. The CODC supports the identification of natural wetlands for protection and the restoration of natural wetlands.
27. The availability of suitably qualified and experienced experts and financial resources to undertake the work necessary is of concern and the CODC supports taking a regional approach to the mapping of SNA's.
28. LF-FW-M7 requires territorial authorities to prepare or amend and maintain their district plans no later than 31 December 2026 in relation to a number of matters related to water bodies, water sensitive design, stormwater discharges, on-site storage of rainfall and use of permeable surfaces. CODC submitted in support in principle but raised concerns around the timing set for implementation and its achievability.
29. The recommendation in the section 42A Hearing Report notes that the CODC submission doesn't request specific relief. While specific relief, in terms of providing another date, has not been sought, the CODC would like to understand the rationale behind the 31 December 2026 timeframe.

LAND AND SOIL

30. CODC supports LF-LS-O11, noting in Central Otago some of the most productive horticultural land is not LUC 1-3.

31. CODC's submission was that Highly Productive Land (HPL) should be identified at a regional level acknowledging that productivity varies depending on the land use activity.
32. The availability of technical expertise in this area is limited and it is logical that the mapping be co-ordinated, making the most of available resources.
33. It is noted that since the submissions on the RPS closed the National Policy State – Highly Productive Land (NPS-HPL) has been released, requiring HPL to be mapped by regional council in collaboration with territorial authorities. ORC staff and territorial authorities have met to discuss working on mapping.
34. CODC supports the amendments to LF-LS-P19 recommended in the section 42A Hearing Report that refers *food and fibre production* rather than 'primary production'.

ECOSYSTEMS AND BIODIVERSITY

35. The CODC supports an integrated and co-ordinated approach to managing ecosystems and indigenous biodiversity and the use of statutory and non-statutory approaches to their management, however, has concerns about resourcing and timeframes for achieving.
36. The CODC supports collaboration with other local authorities and stakeholders in to achieve outcomes.
37. The CODC's concern regarding timeframes in relation to mapping of Significant Natural Areas is satisfied by the recommended inclusion of a specific date of 31 December 2030 in ECO-M2.
38. The CODC considers that the onus of monitoring in terms of ECO-M7 should sit entirely with ORC and disagrees with the recommendation to not accept the submissions of CODC.
39. For most territorial authorities, particularly smaller authorities, staffing levels and jurisdictional responsibilities do not lend themselves to having teams of specialised experts. Engaging the services of a staff ecologist is beyond the reach of most small territorial authorities who struggle to fill more core responsibility roles.
40. The Otago Regional Council has those skills in-house funded by the ratepayers of Otago.
41. The CODC is of the view a more pragmatic approach should be taken to manage ecosystems from a regional perspective, funded by the wider Otago rate payer base making best use of the scarce technical resource available to undertake the work.

CONCLUSION

42. The CODC is generally supportive of the direction and provisions outlined in the proposed Regional Policy Statement.
43. Concerns raised in the CODC submission are related largely to timing of action to be taken under the provisions and availability of resources to undertake the work required.
44. The CODC submission supports mapping and other activities that rely on science based expertise, to be undertaken at a regional level, to make the best use of available resources.
45. The primary concern of CODC in terms of provisions is in relation that associated with Air Quality. As noted previously the Central Otago District has three of the four Air Zone 1 areas for Otago, coupled with the coldest winter temperatures. Many of the houses in these communities are older with varying degrees of insulation.
46. The extremes of temperature experienced in Central Otago often resulting in extended period of cold weather can be challenging for residents. Reliance on electricity as a means of heating can be costly, ineffective and unreliable due to power outages during winter months in some areas.
47. The potential health implications of exceedances during winter months needs to be weighed up against the health implications of a cold home.

Ann Rodgers



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Central Otago District Council

23 November 2022