

SUBMISSION BY OTAGO WATER RESOURCE USER GROUP (OWRUG)

**FRESHWATER PLANNING INSTRUMENT PARTS OF THE PROPOSED
REGIONAL POLICY STATEMENT FOR OTAGO 2021**

29 November 2022

Submission on Proposed Otago Regional Policy Statement 2021

Clause 6 of Schedule 1, Resource Management Act 1991

To: Proposed Otago Regional Policy Statement 2021

Otago Regional Council

Private Bag 1954

Dunedin 9054

By email: RPS@orc.govt.nz

Name of submitter:

1. Otago Water Resource Users Group (**OWRUG**)

Proposal this submission relates to:

2. This is a submission on the Proposed Otago Regional Policy Statement 2021 (**pRPS**).

Trade competition statement:

3. OWRUG could not gain an advantage in trade competition through this submission.
4. OWRUG is directly affected by an effect of the plan change that
 - a. adversely affects the environment; and
 - b. does not relate to trade competition or the effects of trade competition.

Introduction to Otago Water Resource Users Group

5. OWRUG is an unincorporated body of water permit holders in Otago. Its members extend from the Upper Clutha through to the Alexandra basin and include the Cardrona, Arrow, Bannockburn, Pisa area, Teviot, Manuherekia and Taieri catchments.
6. The group evolved out of a United Council Irrigation Committee in the late 1970's and was started to give a combined representation during the sale of the old irrigation schemes from the Government to the irrigators in the 1980's and 1990's.
7. The group has been actively involved in Otago Regional Council policy development, including significant engagement with processes associated with the limit setting plan changes for the 'priority catchments' – the Manuherekia, Arrow and Cardrona Catchments. The ambit of this submission is not however limited to those catchments but from an Otago-wide perspective.

8. OWRUG have an interest in participating in collaborative decision making given its strong region wide representation of water permit holders. In February 2021, consultation was undertaken with interested parties on the proposed regional policy statement, yet OWRUG was not considered to be an interested party at this point, despite representing water permit holders.

Submission:

9. OWRUG made a submission on the pRPS when it was first notified. OWRUG relies on what was said and sought in that submission which is attached as **Annexure B** to this submission.
10. The further submissions set out in this document add to and supplement the original submission. These submissions should be read with the submission already filed.
11. The key additional submission made in this document addresses the freshwater visions in the Land and Freshwater chapter. OWRUG submits that the visions do not comply with the requirements of clause 3.3 of the NPS FM2020, and nor have they been evaluated pursuant to section 32(2) of the RMA for their relative benefits and costs.
12. It is submitted that the failure of this NPS to adopt and evaluate valid visions is fundamental to the Regional Council's obligations to prepare a RPS in accordance with the NPS FM2020 (section 61(1)(d) and (da)) and give effect to the NPS FM2020 under section 62(3) of the Act. OWRUG says that the ORC has failed to meet its minimum obligations under the Act and thus the RPS freshwater provisions cannot be adopted in their current form.
13. The importance of this point is not merely technical. OWRUG's members represent most water users in the Manukerekia and Taieri catchments, and many in the Clutha Mata- Au and North Otago FMUs. It is apparent to OWRUG that its members are the ones that are being asked to make changes to their use of land and freshwater. Other community sectors and interest groups are not being asked to plan for, fund, and implement the visions.
14. It is therefore of vital importance to OWRUG members to have a clear understanding of what the visions mean for them in order that they may know whether they are achievable. At the present time, the visions are expressed in language that lacks objective goals that are capable of measurement that would enable an economic cost-benefit analysis to be performed to evaluate achievability. Farmers ask: since we are being asked to pay for implementing the visions, can the visions be afforded?
15. This pragmatic question cannot simply be deferred to later processes as the section 32 report suggests. Long-term visions must be included in an RPS. The mandatory contents are prescribed. Clause 3.3(2) of the NPS requires:

Long-term visions:

(a) may be set at FMU, part of an FMU, or catchment level; and

(b) must set goals that are ambitious but reasonable (that is, difficult to achieve but not impossible); and

(c) identify a timeframe to achieve those goals that is both ambitious and reasonable (for example, 30 years after the commencement date).

16. Under section 61(1)(c) of the Act, visions must be subject to a section 32 report. This is important because in order for the Council to be satisfied that goals are achievable, they must be subject to a cost-benefit analysis. That is what section 32(2)(a) requires. Contrary to the Act and the NPS FM2020, what the section 32 report actually says about the cost of implementing the visions is this (page 122):

▪ *The provisions in Option 3 represent a paradigm shift in freshwater management in the region.*

There will be significant constraints on the uses of water and land which will, in turn, have considerable impacts on economic growth and employment. The quantum of these costs has not been identified and will depend, in large part, on the provisions developed under the LWRP to implement Option 3. However, the significant shift in policy direction from the current state means it is likely the costs will be significant.

▪ *Otago's communities will incur costs arising from implementing Option 3, particularly from the development and implementation of the LWRP. In the development stage, this includes the cost of preparing submissions and appearing at hearings. The significance and complexity of the LWRP will likely make this engagement a large commitment for most submitters.*

Implementation of the LWRP will also result in costs to land and water users in Otago, particularly where limits or targets are considerably more conservative than the current planning framework. This is likely to require a range of changes in land and water use practices which will come at a cost that is unable to be

quantified at this stage.

17. That is not an adequate section 32 analysis of a vision that demonstrates that the vision's goals are achievable. It is policy-speak for "I don't know, we will figure it out later". The Council has failed in its duty. It is impermissible to defer a proper cost/benefit of analysis of the visions to the Land and Water Regional Plan process.
18. The LWRP must not be set up to fail. It will fail if the visions are not supported by goals that have been demonstrated to be achievable. It is too late to have second thoughts about the visions once the RPS is operative and the community is engaged with the LWRP.
19. Water users are left with no clarity about what is being asked of them. That is unsatisfactory and unlawful. Clause 3.3 of the NPS FM2020 was drafted to guard against precisely this problem.
20. For all of the same reasons, OWRUG also objects to the implementation timeframes. OWRUG cannot be certain that those timeframes are achievable without knowing what must be achieved. The timeframes need to be reconsidered once valid visions are adopted.
21. The underlying problem here is the lack of any understanding or analysis of the role that access to water has in sustaining communities, or how changes might impact upon communities in unforeseen ways. An example may be the transition away from farming livestock to farming carbon where access to water is not sufficiently reliable to support higher value land uses. OWRUG is aware of substantial areas of Otago grazing country being converted to exotic forestry.
22. The Visions do not acknowledge or address the choices being made between land use options and the effect that has on catchment functioning and on communities. A rational economic response to the LF-FW chapter is to recognize the threat to ongoing access to irrigation and plant something that does not require irrigation. Exotic forestry is the economically rational response to policy settings for an individual, but perhaps less so for communities and manawhenua.

Summary of decisions sought by OWRUG:

23. OWRUG seeks the following decisions from Otago Regional Council:
 - a. that the decisions sought in Annexure A to this submission be accepted; and
 - b. the LF-VM- Visions and Management section of the RPS not be adopted without the inclusion of goals that have been subject to a cost/benefit analysis that demonstrates that they are achievable by those who will be tasked to make whatever changes are required to implement the visions.

Wish to be Heard:

24. OWRUG wishes to be heard in support of their submission.

25. If others make a similar submission, OWRUG will consider presenting a joint case with them at a hearing.

Submitter Details:

Otago Water Resource Users Group

Signed for and on behalf of by its Solicitors and authorised Agents

Galloway Cook Allan: Phil Page/Bridget Irving

Date: 29 November 2022

Address for service of submitter:

Address:	c/- Landpro P O Box 302 Cromwell 9342	c/- Galloway Cook Allan PO Box 143 Dunedin 9016
Contact:	Andrea Richardson	Phil Page/ Bridget Irving

Phone:	(03) 445 9905	(03) 477 7312
Email:	andrea@landpro.co.nz	bridget.irving@gallawaycookallan.co.nz
	kate@landpro.co.nz	phil.page@gallawaycookallan.co.nz

Annexure A

SPECIFIC PROVISIONS TABLE OF OWRUG

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
LF – LAND AND FRESHWATER			
PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
LF-VM VISIONS & MANAGEMENT			
LF-VM-02 Clutha Mata-Au FMU Vision	Oppose	<p>Although the general tone of LF-VM-02 Clutha-au (amended as sought in Appendix B) seems desirable, there is no clarity about what achieve the 7 listed goals might require. For example, in LF-VM-02(7)(iii), what does “sustainable abstraction occurs from main stems or groundwater in preference to tributaries” require? Does it require retirement of several hundred kilometers of race network within the Manuherekia catchment in preference for using energy to pump water into the catchment from the Clutha River? Does it require pumping water from the Manuherekia main stem into the Ida Valley? What are the renewable energy and climate change implications of using energy to move water that currently relies on gravity systems?</p> <p>Does LF-VM-02(5) and (7)(b)(i) envisage the removal of existing dams and infrastructure to restore rivers’ natural form and function? What are the implications of that in relation to alternatives, including the effect on soil resources of removing the benefit of stored water?</p> <p>What are the “innovative and sustainable land</p>	<p>Amend LF-VM-02 Clutha Mata-Au FMU to include only such goals that are sufficiently clear to enable them to be subject to a cost-benefit analysis that demonstrates that the meet the requirements of cl 3.3 of the NPS FM2020.</p> <p>Amend the timeframes in (8) to include only such timeframes as can be shown to be achievable.</p>

		and water management practices" that farmers are being asked to adopt in clause LF-VM-02(7)(b)(ii) and have they been modeled for their economic feasibility? How does that goal relate to the goal of restoring the natural form and function of rivers if water storage is inconsistent with that goal?	
--	--	---	--

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
<p>LF-VM-04 Taieri FMU Vision</p>	<p>Oppose</p>	<p>OWRUG support the purpose/intent of the visions, but in addition to the changes sought in Appendix B seeks clarity about what is required.</p> <p>For example, what is intended by LF-VM-04 (4): The gravel bed of the Lower Taieri is restored...”? By who? What is being asked of upstream land and water users to achieve the cessation of sediment transport down the Taieri river system, which is after all the reason why the Lower Taieri plain exists?</p> <p>In (5), what creative ecological approaches that contribute to reduced occurrence of didymo are envisaged, and to be implemented by who?</p> <p>In (8) what “innovative and sustainable land and water management practices [to] support food production and climate change resilience are envisaged? Water storage, extraction, and irrigation exists precisely for the purpose of achieving climate resilience. Does the goal in (8), in conjunction with (1) and the “paradigm shift” mentioned in the section 32 report envisage more water storage as a climate change resilience measure or less? And what are the costs of that?</p> <p>What account should be taken of the constraints with existing infrastructure (topography, dam design and age, race networks, on farm development etc) to accommodate change?</p>	<p><i>Amend LF-VM-04 Taieri FMU vision to include only such goals that are sufficiently clear to enable them to be subject to a cost-benefit analysis that demonstrates that they meet the requirements of cl 3.3 of the NPS FM2020.</i></p> <p><i>Amend the timeframes in (8) to include only such timeframes as can be shown to be achievable.</i></p>

Annexure B

Submission on Proposed Otago Regional Policy Statement 2021

Clause 6 of Schedule 1, Resource Management Act 1991

To: Proposed Otago Regional Policy Statement 2021

Otago Regional Council

Private Bag 1954

Dunedin 9054

By email: RPS@orc.govt.nz

Name of submitter:

1. Otago Water Resource Users Group (**OWRUG**)

Proposal this submission relates to:

2. This is a submission on the Proposed Otago Regional Policy Statement 2021 (**pRPS**).

Trade competition statement:

3. OWRUG could not gain an advantage in trade competition through this submission.
4. OWRUG is directly affected by an effect of the plan change that
 - a. adversely affects the environment; and
 - b. does not relate to trade competition or the effects of trade competition.

Submission:

5. OWRUG's submission relates to the whole proposal. The general and specific reasons for OWRUG's relief are set out in full in **Annexure A** attached to this submission.

Introduction to Otago Water Resource Users Group

6. OWRUG is an unincorporated body of water permit holders in Otago. Its members extend from the Upper Clutha through to the Alexandra basin and include the Cardrona, Arrow, Bannockburn, Pisa area, Teviot, Manuherekia and Taieri catchments.
7. The group evolved out of a United Council Irrigation Committee in the late 1970's and was started to give a combined representation during the sale of the old irrigation schemes from the Government to the irrigators in the 1980's and 1990's.
8. The group has been actively involved in Otago Regional Council policy development, including significant engagement with processes associated with the limit setting plan changes for the

'priority catchments' – the Manuherekia, Arrow and Cardrona Catchments. The ambit of this submission is not however limited to those catchments but from an Otago-wide perspective.

9. OWRUG have an interest in participating in collaborative decision making given its strong region wide representation of water permit holders. In February 2021, consultation was undertaken with interested parties on the proposed regional policy statement, yet OWRUG was not considered to be an interested party at this point, despite representing water permit holders.

Summary of decisions sought by OWRUG:

10. OWRUG seeks the following decisions from Otago Regional Council:
 - a. that the decisions sought in Annexure A to this submission be accepted; and
 - b. Any further consequential amendments required reflect the relief sought; or
 - c. alternative amendments to the provisions of pRPS 2021 to address the substance of the concerns raised in this submission.

Wish to be Heard:

11. OWRUG wishes to be heard in support of their submission.
12. If others make a similar submission, OWRUG will consider presenting a joint case with them at a hearing.

Submitter Details:



Otago Water Resource Users Group

Signed for and on behalf of by its Solicitors and authorised Agents

Gallaway Cook Allan: Bridget Irving

Date: 3 September 2021

Address for service of submitter:

Address:	c/- Landpro P O Box 302 Cromwell 9342	c/- Gallaway Cook Allan PO Box 143 Dunedin 9016
----------	---	---

Contact:	Andrea Richardson	Bridget Irving
----------	-------------------	----------------

Phone:	(03) 445 9905	(03) 477 7312
Email:	andrea@landpro.co.nz	bridget.irving@gallowaycookallan.co.nz
	kate@landpro.co.nz	phil.page@gallowaycookallan.co.nz
		rebecca.crawford@gallowaycookallan.co.nz

ANNEXURE A

GENERAL SUBMISSION OF OWRUG

Te Mana o te Wai

13. The fundamental concept of Te Mana o te Wai and the hierarchy of obligations represents a paradigm shift in the management of freshwater. There are likely to be significant changes required in some places to meet freshwater outcomes in groundwater and surface water bodies, which could have considerable impacts on the social, economic, and cultural well-being of the community depending on the extent of the changes required and the timeframes to achieve the outcomes.
14. OWRUG seeks that Part 2 of the pRPS acknowledges this as a significant resource management issue for the region and that a transition period is required to achieve the environmental outcomes sought. Further, the Land and Freshwater section of the pRPS should set out a framework for setting timeframes to achieve long-term visions over a transition period, for the Regional Council to use when developing regional plan provisions to achieve long-term visions for freshwater across the Otago region. This framework should allow the food and fibre sector time to adjust at a rate that accounts for the potentially significant impacts on their social, economic, and cultural well-being.

Recognition of importance of food and fibre sector

15. The particular importance of primary production and the food and fibre sector within Otago is not articulated clearly enough within the pRPS. Otago's primary sector represents a larger proportion of economic activity in the region relative to other regions. The consequences of this are that regulatory changes that affect the food and fibre sector will have more significant impacts on the economic and social wellbeing of the community. This issue has not been appropriately recognised in the pRPS and as such there are inadequate provisions that address it. This failure means that the pRPS does not achieve sustainable management.
16. Through the recent process for Otago Regional Plan Water Plan Change 7, the Council extensively discussed the need to transition to a framework that gives effect to TMOTW. OWRUG agree that this is required. Given that the pRPS is the first statutory document prepared to facilitate this transition there is inadequate identification of this as an issue for the region and therefore provisions to support a transition from the current framework and/or regime to

a post TMOTW regime. The pRPS fails to clearly identify this transition or how such a transition will be implemented.

17. OWRUG also consider that the pRPS provisions, and in particular the Land and Freshwater chapter, should be amended to provide stronger recognition of the importance of primary production land and the economic uses of soil.
18. The group support the recognition and prioritisation of using highly productive land for primary production in the pRPS but seek that this recognition should extend to all land used for food and fibre production.

SPECIFIC PROVISIONS TABLE OF OWRUG

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
PART 1 INTRODUCTION AND GENERAL PROVISIONS			
Description of the Region	Oppose in Part	<p>Otago has a significant proportion of its economy generated by the primary sector, including being nationally recognised for its unique productive capacity and contribution to the food supply network. This is particularly so for the Central Otago, Clutha and Waitaki Districts.</p> <p>Despite this the pRPS has not clearly responded to this significant regional value and associated resource management issues.</p>	<p>Amend Description of the Region to:</p> <ul style="list-style-type: none"> • <u>Appropriately record the significant role of the Food and Fibre Sector</u> • <u>Identify that the region is nationally recognised for its unique productive capacity and place in the national food and fibre supply network.</u> • <u>Identify that the unique climatic conditions create unique opportunities for the food and fibre sector, particularly horticulture and fine wool production.</u> • <u>Recognise the importance of efficient irrigation and water storage to the production of food and fibre</u>
How the policy statement works Cooperation and partnerships with stakeholders	Oppose in Part	The submitter supports the statement that ORC will seek to establish and build upon working relationships with other resource management stakeholders. This should be translated into a method that commits to the formation of a rural advisory panel (as per Bay of Plenty Regional Council and Auckland Council) to assist with establishing and	Translate statement into a method that commits to the formation of a rural advisory panel

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		building upon relationships, including with rural communities.	
Food and Fibre Sector	New provision	<p>The food and fibre sector is a significant part of the national and regional economy. It accounts for 75% of New Zealand's merchandise exports¹. In the Central Otago District, Primary Industries make up 14.7% of GDP, compared to the national average of 6.2%². In the Clutha District, Agriculture, Forestry and Fishing make up 32.1% of GDP, and in the Waitaki District Agriculture, Forestry and Fishing make up 32.5% of GDP.³ These figures attest to the importance of the food and fibre sector to Otago's Economy.</p> <p>The sector also generates effects that impact the natural environment and require management to meet other objectives.</p>	<p>Insert a new provision for the Food and Fibre Sector:</p> <p><i><u>includes the primary sector production industries (excluding mining), the related processing industries and services industries along the value chain from producer to final consumer including transporters, storage, distribution marketing and sales.</u></i></p>
Highly productive land	New provision	<p>The term highly productive land is used in the pRPS but is not defined. Identification of HPL will be included in the Land and Water Regional Plan by December 2023 (LF-LS-P19 and LF-LS-M11 (3)) However until such time there is a lack of clarity as to how HPL policies may be applied. The pNPS-HPL has a default definition for HPL in the interim and a similar</p>	<p>Include a definition for highly productive land as follows:</p> <p>a) <u>Land that has been identified as highly productive land using LF-LS-P19; OR</u></p> <p>b) <u>where identification has not occurred as in a), land in the rural area that is classified as LUC 1,2 3 or 4 as mapped by</u></p>

¹ Dalziel, Paul, Caroline Saunders and John Saunders (2018). *The New Zealand Food and Fibre Sector: A Situational Analysis*. Client report prepared for the Primary Sector Council. Lincoln University: Agribusiness and Economics Research Unit.

² Central Otago District Annual Economic Profile Report 2020, Infometrics Limited.

³ <https://ecoprofile.infometrics.co.nz/>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		approach is sought in the pRPS. OWRUG also seek to have land classified as LUC 4 be included in the definition as this land is currently used for highly productive activities within Otago. Referring to only LUC1-3 would not capture some of the most productive land within Otago.	<u>the NZ Land Resource Inventory or by more detailed site mapping.</u>
Abbreviations table	Support	Provides clarity for the plan reader	Retain as notified
National directions instruments	Support	Provides clarity for the plan reader	Retain as notified
MANAWHENUA			
Objective MW-O1 Principles of Te Tiriti o Waitangi	Oppose in Part	<p>The objective requires the principles of Te Tiriti to be given effect to. This is inconsistent with the requirements of the Act, particularly Section 8.</p> <p>The Objective needs to be clear that the obligation arises as between Councils and Papatipu Runaka.</p> <p>The Objective also needs to be clear about what values are to be protected. These are set out in the Mana Whenua Chapter so should be specifically referred to.</p>	<p>Amend MW-01 Principles of Te Tiriti o Waitangi as follows;</p> <p><i>The principles of Te Tiriti o Waitangi are <u>taken into account by Local Authorities in resource management processes and decisions, utilising a partnership approach between with Papatipu Rūnaka to support Kai Tahu Values and Resources of significance.</u></i></p>
Policy MW-P3 Supporting Kai Tahu Wellbeing	Oppose in Part	<p>The overall goal of supporting Kai Tahu wellbeing is supported. However, the provision is unclear. The term natural and physical environment should be utilised for clarity.</p> <p>The requirement to 'restore' uses and values is considered to be too high a threshold given</p>	<p>Amend MW-P3 Supporting Kai Tahu Wellbeing as follows;</p> <p><i><u>Natural and Physical resources</u> are managed to support Kāi Tahu well-being by:</i></p> <ol style="list-style-type: none"> <i>protecting customary uses, Kāi Tahu values and relationships of Kāi Tahu to resources and areas of significance, and</i>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>that some changes to the environment that have occurred since the establishment of these uses and values are irreversible.</p> <p>Clause 2 should be redrafted so that mauri is an outcome of safeguarding life-supporting capacity.</p>	<p><i>enhancing these uses and values where they have been degraded by human activities,</i></p> <ol style="list-style-type: none"> 2. <i>safeguarding <u>health and well-being of natural resources so as to provide for the mauri of these resources,</u> and;</i> 3. <i>working with Kāi Tahu to incorporate mātauraka in resource management.</i>
Explanation MW-E1 Explanation	Oppose in Part	Consequential amendment to reflect changes to MW-O1	<p>Amend MW-E1 Explanation as follows;</p> <p><i>The policies in this section are designed to achieve MW-O1 by setting out the actions that must be undertaken by local authorities to ensure the principles of Te Tiriti o Waitangi are <u>taken into account</u> in resource management processes and decisions. The policies also require the development and implementation of planning tools which recognise the role of Kāi Tahu in resource management and ensure their engagement with and participation in resource management <u>that arises from a partnership approach with Local authorities.</u></i></p>
Principal reasons MW-PR1 – Principal Reasons	Oppose in Part	Consequential amendment to reflect changes to MW-O1	<p>Amend MW-PR1 Principal Reasons as follows;</p> <p><i>Te Tiriti o Waitangi creates a special relationship between takata whenua and the Crown. Section 8 of the RMA 1991 requires local authorities to take the principles of Te Tiriti o Waitangi into</i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			<p><i>account. These principles include kāwanataka, rakatirataka, partnership, participatory decision making and active protection of Kāi Tahu resources. Section 7(a) of the RMA 1991 requires decision makers to have particular regard to kaitiakitaka. Effective kaitiakitaka is dependent upon the extent to which Kāi Tahu can exercise rakatirataka, which requires the authority and ability to make decisions relating to management of resources.</i></p> <p><i>Local authorities need to incorporate Treaty principles into their decision making and ensure they are properly applied, to account for the effects of resource management decisions on Kāi Tahu values, including those described in iwi resource management plans. Deliberate measures need to be taken <u>by Local Authorities</u> to ensure the principles are well understood. The principles are broadly expressed <u>which can make it difficult for people to understand their implications and</u> a measure of flexibility is needed in applying them. <u>Local authorities have an important role in facilitating and providing clarity about the implementation of the principles at a practical level.</u></i></p> <p><i>The provisions in this chapter assist in implementing sections 6(e), 7(a) and 8 of the RMA 1991 by requiring a partnership approach which involves Kāi Tahu and considers mana whenua rights, interests and values in decision</i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			<p><i>making processes, and enables Treaty principles to be taken into account in an appropriate way.</i></p> <p><i>Implementation of the provisions in this chapter will occur primarily through regional and district plan provisions. However local authorities may also adopt additional non-regulatory methods to implement the policies and support achievement of the objective.</i></p>
<p>Anticipated Environmental results – MW-AER1 and 2</p>	<p>Oppose in Part</p>	<p>Consequential amendment to reflect changes to MW-O1</p> <p>AER-02 introduces some uncertainty for plan users who may not be fluent in te reo. 'taoka tuku iho' would benefit from having the English translation alongside it, or an alternative phrase should be used that identifies the specific Kāi Tahu values or significant resource.</p>	<p>Amend MW-AER1& AER2 Anticipated Environmental Results as follows;</p> <p><i>MW-AER1 Resource management processes and decisions <u>take into account</u> the principles of Te Tiriti o Waitangi.</i></p> <p><i>MW-AER2 Strong relationships between Kāi Tahu and local authorities facilitate the exercise of rakatirataka and kaitiakitaka by mana whenua in relation to their taoka tuku iho.</i></p> <p><i>Overall clarity and certainty of the pRPS would be enhanced by including te reo terms in the interpretation section.</i></p>
<p>PART 2 – RESOURCE MANAGEMENT OVERVIEW</p>			
<p>SIGNIFICANT RESOURCE MANAGEMENT ISSUES</p>			
<p>SRMR Significant resource management issues for the region</p> <p>- Introduction</p>	<p>Oppose in Part</p>	<p>The introduction would be improved by noting that the Otago's people and communities rely on the natural resources of the land and 'soils'.</p>	<p>Amend SRMR Introduction as follows;</p> <p><i>Otago's people and communities rely on the natural resources that Otago's environment provides to enable their social, economic, and</i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>Food production, food supply and food security have been bundled within the issue statement of economics. The issue should be expressed after the last line of this introduction where social and cultural matters are addressed.</p> <p>The regional value of food production is expressed through the vision of four the five Freshwater Management Units:</p> <ul style="list-style-type: none"> • Clutha Mata-au FMU • North Otago FMU • Taieri FMU • Catlins FMU <p>Despite this the pRPS has not clearly responded to this significant regional value and associated resource management issues or adequately identified the importance of Fibre Production which supports construction of housing and clothing manufacture etc.</p>	<p><i>cultural well-being. Natural resources include freshwater (i.e. surface and groundwater, wetlands, estuaries), land <u>and soil</u>, terrestrial and freshwater ecosystems, coastal and marine ecosystems, and air, landscapes, vegetation and natural landforms.</i></p> <p><i>From an economic perspective natural resources support, and are impacted by, <u>food and fibre production</u>, urban development, industrial development, infrastructure, energy generation, transport, marine industries (fishing and aquaculture), tourism and mineral extraction.</i></p> <p><i>From a social and cultural perspective natural resources support and are impacted by <u>food and fibre sector production</u>, recreation, housing, and cultural activities (Refer Figure 2). <u>Food and fibre sector production, in particular secure food supply and security are essential to human health needs which are to be provided for through sustainable resource management.</u></i></p> <p><i>This RPS identifies the eleven most significant issues impacting the Otago region. Issues firstly considered include natural hazards, climate change, <u>food and fibre sector production</u>, pest species, water quantity and quality, and biodiversity loss, collectively the “natural asset-based issues”.</i></p> <p>Figure 2 should also be amended to refer to food and fibre production.</p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
<p>SRMR-I1 – Natural hazards pose a risk to many Otago communities</p> <p>- Statement</p>	<p>Oppose in Part</p>	<p>The statement would be improved by noting that natural hazards pose a risk to the food and fibre sector and the relationship with resilient infrastructure.</p>	<p>Amend SRMR Statement as follows:</p> <p><i>An earthquake on the Alpine Fault would cause potentially catastrophic impacts on the entire region. Particular areas in Otago are prone to flooding. A major hazard event could isolate all or parts of Otago for an extended time. <u>Natural hazards pose a risk to the food and fibre sector, both in terms of short term provision of food, but also longer term productivity. The role of local food production will be essential in the event of a significant natural hazard. The resilience of the sector is reliant in part on the infrastructure that serves it, such as transport, electricity and communications networks.</u></i></p>
<p>SRMR-I1 – Natural hazards pose a risk to many Otago communities</p> <p>- Context</p>	<p>Oppose in Part</p>	<p>The context would be improved by noting that natural hazards pose a risk to food production and events can disrupt food supply. Noting historic heritage without noting the risks to essential human health needs is a deficiency in the statement.</p>	<p>Amend SRMR Context as follows:</p> <p><i>The Otago region is exposed to a wide variety of natural hazards that impact on people <u>including housing, food and water</u>, property, infrastructure, historic heritage and the wider environment...</i></p> <p><i>Frequent heavy rainstorms, the steep gradients of many river catchments and human occupation of floodplains combine to make flooding the most frequently occurring natural hazard event in the Otago region. For example, flooding can affect Otago's main urban centres causing damage to housing and business disruption. <u>It can disrupt food and fibre production which can compromise food supply</u></i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			<i>chains. It also creates animal welfare issues and damages productive land resulting in the likes of crop and infrastructure damage which takes considerable time and effort to reinstate. Recovering from these events can take a number of years.</i>
SRMR-I1 – Natural hazards pose a risk to many Otago communities - Impact snapshot / Economic	Oppose in Part	This Snapshot under cooks the impact of hazards and the various contributors to the scale of these impacts.	Amend Impact Snapshot as follows: <u>Economic</u> <i>...For industry, hazards can damage production assets and infrastructure with associated costs, disrupt service delivery and limit availability and access to goods and services, and cause decline in sales and increased costs. Loss or changes in production flows can be either temporary or permanent depending on financial resilience of businesses, which is a function of their existing loan commitments, credit worthiness insurance cover and/or the speed at which normal service can resume (if at all). This will often depend on the ability for lifeline utilities to maintain or re-establish normal levels of service quickly.</i> <u>Food security and fibre sector production systems</u> can also be affected impacting on the regional economy with immediate effect on jobs and longer-term effects on production value and domestic and export returns.
SRMR-I1 – Natural hazards pose a risk to many Otago communities	Oppose in Part	As above	Amend Impact Snapshot as follows: <u>Social</u>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
- Impact snapshot / Social			<p><i>... There can be short and long terms impacts on the regional and nationally significant Otago food production system. The food supply chain can be disrupted, the extent of which will be influenced by the nature of the event and the ability of lifeline utilities and essential service providers to maintain or re-establish normal levels of service quickly.</i></p>
<p>SRMR-12 – Climate change is likely to impact our economy and environment</p> <p>- Statement</p>	<p>Oppose in Part</p>	<p>In the context of greenhouse gas emissions reduction targets, the Paris Agreement highlights the importance of food production and food security, recognising the “fundamental priority of safeguarding food security ...” and noting the need to adapt and foster resilience and lower emissions, in a manner that does not threaten food production.</p> <p>Diversification within the food and fibre sector presents an opportunity to reduce emissions while increasing food production, as identified by the Climate Change Commission.</p> <p>‘Ināia tonu nei: a low emissions future for Aotearoa’ includes the assumption (in the Demonstration Path) that 2,000 ha of land will be converted to horticulture per year from 2025 and notes that the Commission expect this could increase if “barriers –such as water availability, labour, supply chains and path to market – are addressed”.</p>	<p>Amend SRMR-12 as follows:</p> <p>SRMR-12 – Climate change is likely to <u>will</u> impact our economy and environment</p> <p><i>Statement</i></p> <p><i>Otago’s climate is changing, and these changes will continue for the foreseeable future. Central Otago is likely to see more varied precipitation, leading to increased flooding and reduced water reliability. This will be compounded by stronger winds, increased temperatures and longer dry periods, which may affect the number and types of crops and animals that the land can sustain. <u>Food and fibre production systems will need to change in response and to maintain food supply and important fibre sources for the community.</u></i></p> <p><i>On the coast, low lying areas like South Dunedin are at risk of inundation from rising sea levels.</i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>Opening up more opportunities for conversion to lower emissions production systems and land uses is listed as a critical outcome.</p> <p>As such it is important to not create barriers to climate change adaptation and/or mitigation and enable long-term climate change adaptation and/or mitigation, though projects such as water storage and provisions which enable growing areas to move between regions. Recognition of this should be captured in the description of all FMU's.</p>	<p><i>This will also exacerbate coastal erosion, which could damage coastal infrastructure (including roads), damage historic heritage, particularly wāhi tūpuna, and expose old waste dumps (e.g. at Middle Beach). Climate change will also affect native animals and plants, compounding the impacts of existing pests and stresses and providing opportunities for new pests to establish themselves due to changed conditions.</i></p> <p><i>The impact of other climate change threats is unpredictable. <u>It is important to not create barriers to climate change adaptation and/or mitigation and for long-term climate change adaptation and/or mitigation to be actively facilitated to speed up the transition to a lower emissions economy.</u></i></p>
<p>SRMR-I2 – Climate change is likely to impact our economy and environment</p> <p>- Context</p>	<p>Oppose in Part</p>	<p>The context states that the rate of future climate change depends on how fast greenhouse gas concentrations increase. The statement would be improved by also noting that the region has an opportunity to reduce emissions including through land use change.</p>	<p>Amend SRMR-I2 Context as follows:</p> <p><i>The rate of future climate change depends on how fast greenhouse gas concentrations increase. <u>The region has an important role to play to reduce emissions including through land use production system adaptation and change.</u></i></p>
<p>SRMR-I2 – Climate change is likely to impact our economy and environment</p> <p>- Impact Statement / Economy / Regional Industry</p>	<p>Oppose in Part</p>	<p>Diversification to horticulture and transition to low emission production systems presents an opportunity to reduce emissions while increasing food production, as identified by the Climate Change Commission. This will maintain a robust regional economy.</p>	<p>Amend SRMR- I2 Impact Statement / Economy / Regional Industry as follows:</p> <p><i>Climate change may also result in shifting land-use activities to adapt to altered climate conditions, which will incur costs, and</i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>Such changes are also reliant on certainty with respect to water access. Hence the need to take a long-term and integrated approach to support adaptation and transition.</p>	<p><i>potentially enable resources previously unviable to come into production.</i></p> <p><u><i>Diversification to different farm systems and transition to lower emission production systems presents an opportunity to reduce emissions and support the transition to a low emissions economy. It is important that decision makers can assess the benefits of land use change and that the resource management framework facilitates these transitions by providing certainty to enable investment. This includes the utilisation of water to support low emission production systems.</i></u></p> <p><i>However, these benefits may be limited by negative effects of climate change such as prolonged drought and increased flood risk. Some of these impacts can be mitigated by adaptation, for example, planting new crops that are better suited to new climatic conditions or through changes in crop intensification, or water harvesting and storage practices.</i></p>
<p>SRMR-12 – Climate change is likely to impact our economy and environment</p> <p>Environment</p>	<p>Oppose in Part</p>	<p>OWRUG has concerns that the pRPS provisions managing water allocation and climate change may incentivise land use changes from pastoral farmland to exotic plantation forests for carbon sequestration. This could have the unintended consequence of reducing the amount of water available for runoff and river flow in catchments that rely on rainfall as its main source of flow. Exotic afforestation may reduce annual water yield in</p>	<p>Amend SRMR-12 to recognise the risk on water resources due to afforestation of plantation forests for carbon sequestration.</p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>water-short catchments and reduce the amount of water available for other productive uses or human health needs. There may also be impacts on minimum flow restrictions in some catchments, as the effects of exotic plantation forests on river flows may be similar to consented surface water abstractions, but unlike these takes, water yield from plantation forests cannot be stopped once a minimum flow restriction is reached.</p> <p>This position is reached, notwithstanding the fact that some land (in particular Class 6 and Class 7 Land) may be suited for carbon farming purposes. Therefore, it will be important for an integrated approach to be taken to ensure that the potential effects of land use change are considered to ensure that any effects on other activities and resources (such as water, landscape and natural character) are managed.</p>	
<p>SRMR-13 – Pest species pose an ongoing threat to indigenous biodiversity, economic activities and landscapes</p>	<p>Oppose in Part</p>	<p>Pest species and biosecurity risks also pose a threat to food production and food security. The statement also does not identify Wallaby as a pest species which is of particular concern to the Food and Fibre Sector if is not managed correctly and significant risk of range expansion within Otago which may be exacerbated by illegal liberations⁴. Similar to</p>	<p>Amend SRMR- 13 as follows: <i>Include reference to Wallabies throughout SRMR-13</i> <i>SRMR-13 – Pest species pose an ongoing threat to indigenous biodiversity, <u>food and fibre production and food security</u>, economic activities and landscapes.</i></p>

⁴ Review of Current and future predicted distributions and impacts of Bennett’s and dama wallabies in mainland New Zealand, Final Report. MPI Technical Paper No: 2016/15

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		rabbits, Wallabies consume food that would otherwise be available to stock, reducing the efficiency of these food and fibre production systems. They also pose a risk to indigenous biodiversity and forestry.	
SRMR-13 – Pest species pose an ongoing threat to indigenous biodiversity, economic activities and landscapes - Statement	Oppose in Part	The statement fails to address the risk pest species pose to food and fibre production and food security.	<p>Amend SRMR- 13 Statement as follows:</p> <p><i>Pest species can be found throughout Otago, from alpine to marine environments. Rabbits are changing Central Otago’s landscape, eroding soils and affecting agriculture. <u>Wallabies are an increasing risk with incursion beyond their containment zone and illegal liberations resulting in an expanding range within Otago, particularly Waitaki, Central Otago and Queenstown Lakes.</u> Wilding conifers threaten high country and tussock grassland, changing the landscape and impacting on recreational, hydrological and conservation values. Aquatic pests and weeds such as didymo, lake snow and lagarosiphon affect our lakes and rivers. Invasive marine species affect our marine waters. Native aquatic plants are displaced, impacting ecosystem and indigenous biodiversity health and recreation activities.</i></p> <p><i><u>Climate change will compound the impacts of existing pests and provide opportunities for new pests to establish themselves. This will potentially threaten food and fibre production</u></i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			<i>systems and food supply and undermine community wellbeing.</i>
SRMR-13 – Pest species pose an ongoing threat to indigenous biodiversity, economic activities and landscapes - Impact snapshot /economic	Oppose in Part	The economic impact of pest species does not just affect agriculture, but all production types within the food and fibre sector.	Amend the whole of the plan as follows; <u>Refer to Food and Fibre Sector instead of agriculture. This should be picked up throughout the plan.</u>
SRMR-13 – Pest species pose an ongoing threat to indigenous biodiversity, economic activities and landscapes - Impact snapshot / Social	Oppose in Part	The social impact snapshot only considers impacts on recreational values and human health problems and fails to consider food and fibre production, food supply and food security matters.	Amend SRMR- 13 Impact snapshot / Social as follows: <i>Recreation values can be impacted through loss of amenity, access or landscape values. Pests can also cause human health problems. For example, some weed pollens can induce asthma and cause allergies (e.g. hay fever). Zoonoses (bacterium, viruses, parasites, prions) can result in diseases being transferred from animals to humans and include, for example, leptospirosis and campylobacter. <u>Pests and biosecurity incursions can affect food and fibre production, food supply and food security matters.</u></i>
SRMR-14 – Poorly managed urban and residential growth affects productive land, treasured natural assets, infrastructure and community well-being - Impact snapshot / Economic	Oppose in Part	<p>The loss of productive land (either directly though building on it, or indirectly though reverse sensitivity effects) is not just an economic impact but also a social impact on food production and food security.</p> <p>Water is another resource that can be adversely affected by poorly managed urban growth and development. These resources</p>	Amend SRMR- 14 Impact snapshot/Economic as follows; <u>Include the loss of productive land (either directly though building on it, or indirectly though reverse sensitivity effects) as a social impact on food production and food security.</u>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		can be poorly allocated and inefficiently used and unavailable in a sufficient qualitative and quantitative state for food production.	<i><u>Identify that water is another resource that can be adversely affected by poorly managed urban growth and development.</u></i>
SRMR-15 – Freshwater demand exceeds capacity in some places - Statement	Oppose in Part	<p>Amend the statement to note that rural land uses are changing to meet food and fibre production demands of growing populations and will continue to change to respond to climate change.</p> <p>Also needs to be consistent with the language in the NPSFM with respect to Te Mana o Te Wai.</p>	<p>Amend SRMR- 15 Statement as follows:</p> <p><i>In water-short catchments, freshwater availability may not be able to meet competing demands from the health and well-being needs of the environment-freshwater, the health and well-being needs of people, and the ability of people and communities to provide for their social, economic and cultural well-being. Many of these catchments are also experiencing urban growth, changes in rural land uses <u>to meet food and fibre supply demands from growing populations and the need to implement change to respond to climate change, including increased demand for hydro-electricity.</u></i></p>
SRMR-15 – Freshwater demand exceeds capacity in some places - Context	Oppose in Part	<p>Water is necessary for food and fibre production. This is linked at least in part to population growth and the need to provide for the health needs of people.</p> <p>It has been recognised that this pRPS will manage a significant period of transition for Otago communities relating to water use. The changes required to give effect to the NPSFM are likely to be significant and will require considerable adaptation. This will be required at the same time that communities are required to adapt to other challenges such as</p>	<p>Amend SRMR- 15 Context as follows:</p> <p><i>Population growth, <u>food and fibre production and land-use intensification in urban and rural environments can create increased demand for freshwater for human consumption, irrigation and other economic uses. Freshwater resources in some places are reaching, or are beyond, their sustainable abstraction limits. However, there continues to be debate in the community about how historical freshwater allocations can be adjusted to achieve a balance of economic, environmental, social and cultural needs.</u></i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>climate change. This has not been adequately acknowledged within the pRPS.</p>	<p><i>Whatever the outcome of those debates there will need to be significant change implemented over appropriate timeframes to adjust to the new allocation regime. Managing this transition carefully will be necessary to manage the impacts that will affect the social, economic and cultural wellbeing, including mental health of the community.</i></p>
<p>SRMR-15 – Freshwater demand exceeds capacity in some places - Impact Snapshot</p>	<p>Oppose in Part</p>	<p>Water is necessary for food and fibre production. This is linked to population growth food demand and changing perspectives on the types of materials that are used for day-to-day activities – such as plastics.</p> <p>The social impacts discussion covers freshwater needs in regard to essential urban growth needs. It also covers recreational uses. There is no discussion on water and its link to food and fibre production or rural communities. This is addressed in SRMR-16 in the context of water quality but not in terms of demand and how this then must influence allocation decisions.</p> <p>The Social impact snapshot fails to adequately discuss the significance of water use in supporting the social well-being of communities, the potential adverse effects as water allocation regimes change.</p>	<p>Amend SRMR- 15 Impact Snapshot as follows:</p> <p><i>Freshwater abstraction can reduce water level or flow and connections between different water bodies. This can negatively impact ecosystems by affecting freshwater habitat size and the shape and condition of the water body, including bed, banks, margin, riparian vegetation, connections to groundwater, water chemistry (for example by increasing concentrations of pollutants), and interaction between species and their habitat. How much an ecosystem is affected by taking freshwater is determined by departure from natural flow regimes, taking into account magnitude, frequency, timing, duration and rate of change, <u>species composition</u> and ecosystem capacity to recover.</i></p> <p><i>Freshwater in the Otago region is a factor of production that directly contributes to human needs (urban water supply and food production),</i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			<p><i>Food and fibre production (including irrigation and irrigation storage), hydro-electric power supply, and mineral extraction. Freshwater also indirectly contributes to the tourism industry through maintenance of freshwater assets for aesthetic and commercial recreational purposes. Lack of freshwater can negatively impact economic output of those industries that rely on water in the production process. To varying degrees these impacts can be mitigated through water efficiency measures and innovation. At the same time other industries, such as tourism that rely on the aesthetic characteristic of rivers and lakes, do not have such opportunities available to them and instead rely on management regimes that sustain flows and water levels suitable for their activities.</i></p> <p>Amend the Social Impact Snapshot by adding the following:</p> <p><i><u>Many communities in Otago are heavily reliant on the food and fibre sector which generates significant economic activity, as well as providing product to both the domestic and export market. Reduction in water allocation will adversely impact on the productive capacity of the food and fibre sector with significant downstream economic consequences. These economic consequences will manifest as reduced social cohesion in small communities as</u></i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			<p><i>people move away to find other sources of employment, or the availability of locally grown food diminishes. However, there are also opportunities for increased employment associated with the transition to new land use types that may be precipitated by changes to allocation regimes and/or climate change adaption. Managing this transition carefully will be necessary to manage the impacts that will arise for the social, economic and cultural wellbeing, including mental health of the community and seeking out opportunities that will improve these well-beings. In order to address these issues, providing certainty to resource users, including the food and fibre sector and a clear and integrated transition framework is necessary.</i></p>
<p>SRMR-15 – Freshwater demand exceeds capacity in some places - Impact Snapshot – Environmental</p>	<p>Oppose in Part</p>	<p>This statement is incomplete as it does not acknowledge the reality in some of the catchments of Otago which are now irreversibly changed by combination of exotic species and hydrological flow alteration due to the likes of Dams which may in and of themselves hold values of importance to the community.</p>	<p>Amend SRMR- 15 Impact Snapshot as follows: <i>...How much an ecosystem is affected by taking of freshwater is typically determined by departure from natural flow regimes, taking into account the magnitude, frequency, timing duration and rate of change and ecosystem capacity to recover. However, in parts of Otago the flow regime that exists has been significantly altered due to the establishment of dams for water storage and hydro-electricity generation. In many cases these structures have been in place for many years (i.e. 80 to 100 years) and have values (including environmental, social</i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			<p><i>and economic values) associated with them. These factors will in some instances affect the degree to which natural flow regimes can or should be restored.</i></p> <p><i>Further, exotic freshwater species, particularly salmonids are widespread with Otago's waterbodies. They are valued by the community as a source of food and for their sports fishing values. However, they also can have adverse effects on indigenous species. In some cases flow regimes induced by abstractions have protected indigenous species from predation. Changes to flow regimes will need to be carefully managed to ensure that these interactions do not give rise to significant loss of vulnerable indigenous species. These factors will in some instances affect the degree to which natural flow regimes can or should be restored.</i></p>
<p>SRMR-16 – Declining water quality has adverse effects on the environment, our communities, and the economy - Statement</p>	<p>Oppose in Part</p>	<p>The statement is overly general, does not recognise that incursion of pest species is also having an adverse effect on water quality in some instances such as lake snow, largosiphon, didymo.</p> <p>Further declining trends may not arise from land use intensification, in some cases lower intensity activities are more detrimental.</p>	<p>Amend SRMR- 16 Statement as follows: <i>"...which can be attributed to discharges from land use activities (both rural and urban), land management practices <u>and aquatic pest species.</u></i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
<p>SRMR-16 – Declining water quality has adverse effects on the environment, our communities, and the economy</p> <p>- Context</p>	<p>Oppose in Part</p>	<p>The context usefully identifies that water quality affects a wide range of environmental health factors, human survival needs, and cultural, social, recreational, and economic uses.</p> <p>It is helpful that the context identifies the NESF and NPSFM, however the implications of these document should be elaborated on.</p>	<p>Amend SRMR- 16 Context as follows:</p> <p><i>The health of water is vital for the health of the environment, people and the economy. It is at the heart of culture and identity. Nationally, and in parts of Otago, freshwater is facing significant pressure. Population growth and <u>poorly managed</u> land-use in urban and rural environments has impacted the quality of water, increasing contamination from nutrients and sediment.</i></p> <p><i>Water quality affects a wide range of environmental health factors, human <u>health and</u> survival needs, and cultural, social, recreational, and economic uses.</i></p> <p>Add the following to the 3rd paragraph:</p> <p><i><u>"The direction in this higher order document is significant and will precipitate changes within the Otago Region. The direction of travel required by these documents has broad community support, however the detail regarding the degree of change and over what timeframe remain as points of contention within some communities. Whatever the outcome affected communities face a period of significant change which will be very challenging and may have adverse consequences for people and communities. This transition requires careful management in order to maintain social,</u></i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			<i>cultural and economic wellbeing, including mental wellbeing.</i>
<p>SRMR-16 – Declining water quality has adverse effects on the environment, our communities, and the economy</p> <p>- Impact Snapshot</p>	<p>Oppose in Part</p>	<p>The Environmental snapshot is overly general and does not reflect the SOE report relied upon. There is also a failure to recognise the impact that aquatic pests have on water quality indicators.</p> <p>Likewise, water quality issues are linked to agricultural intensifications which is an oversimplification.</p> <p>The economics discussion does not acknowledge the costs that might arise from human health effects or the need for the food and fibre sector to also have access to clean water.</p> <p>The social discussion only acknowledges some of the benefits of clean water and does not identify the downstream community benefits that arise from the use of clean water.</p> <p>The social impacts discussion focusses on food gathering and recreation which is wholly deficient. There is no discussion on clean water as a human health need and its link to food production. Likewise, it does not acknowledge the social and cultural benefits</p>	<p>Amend SRMR- 16 Environmental Snapshot as follows:</p> <p><i>Despite the region's lakes and rivers being highly valued by Otago communities, reports indicate there are reasons for concern about water quality and its trends in <u>some</u> areas with consequent potential impact on ecosystems and people.</i></p> <p><i>... Otago's central lakes are impacted by increased population, urban development, <u>aquatic pests</u> and tourism demand;</i></p> <p><i>Activities such as agricultural <u>land use</u>, mining, and forestry also contribute.</i></p> <p><i><u>Poorly managed</u> agricultural <u>land-use</u> also contributes to nutrients (nitrogen and phosphorus) leaching into underlying groundwater or running off into surface water bodies, and can also increase the risk of E.coli contamination from animal waste.</i></p> <p>Amend Economic snapshot</p> <p><i>... Water pollution (from nutrients, chemicals, pathogens and sediment) can have far-reaching</i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>that arise for communities utilising clean water.</p>	<p><i>effects potentially impacting tourism, property values, commercial fishing, recreational businesses, <u>human health, food production and many other sectors that depend on clean water.</u></i></p> <p>Amend Social snapshot</p> <p><i>For the wider community, w</i><u><i>Water is a source of kai for harvesting and food production.</i></u> <i>and</i></p> <p><u><i>Water is also a source of recreation, including swimming, fishing and water sports. Otago's rivers, lakes, estuaries and bays are important destinations for recreational use including swimming, fishing and water sports. Eighty-two per cent of Otago's rivers and lakes are swimmable.³³ Where water quality cannot support these activities, the lifestyle of those living in Otago is impacted. Thriving rural communities are also supported by the use of good quality water for food and fibre production.</i></u></p> <p><i>Where water quality is degraded quality the taoka habitats and species supported by the water may be adversely affected reduces and the mauri of the water reduced. and the habitats and species it supports, therefore also negatively affecting mahika kai and</i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			<p>taoka species and places. This Loss of mahika kai and taoka species constitutes <u>is</u> a loss of Kāi Tahu culture, affecting the intergenerational transfer of knowledge handed down from tūpuna over hundreds of years; and it culminates in a loss of rakatirataka and mana.</p>
<p>SRMR-17 – Rich and varied biodiversity has been lost or degraded due to human activities and the presence of pests and predators</p>	<p>Support in Part / Oppose in Part</p>	<p>It is agreed that there are a range of threats to biodiversity, including vegetation clearing and grassland improvement. However, it is not that simple. In some instances land use activities are supporting the persistence of indigenous biodiversity and 'holding off' the further incursion of pest species. In these circumstances it is important to ensure that changes to land use techniques will not result in unintended consequences that will be more difficult to address. For example, removal of grazing pressure allowing spread of pest species.</p>	<p>Amend SRMR- 17 as follows:</p> <p>Environmental</p> <p>Add the following paragraph</p> <p><u>Despite the above, in some cases land management or water use practices are enabling indigenous species to persist. It is therefore important to carefully manage significant changes in such practices where they might give rise to unintended consequences.</u></p> <p>Economic</p> <p><u>Amend 'agriculture' to 'the food and fibre sector'.</u></p>
<p>SRMR-18 – Otago's coast is a rich natural, cultural and economic resource that is</p>	<p>Oppose in Part</p>	<p>The context identifies that the activities occurring within or affecting the coastal</p>	<p>Amend SRMR-18 as follows:</p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
<p>under threat from a range of terrestrial and marine activities</p> <p>- Context</p>		<p>environment include land and marine based (e.g. aquaculture) food production industries. Furthermore, the context describes that such activities can be important contributors to the existing and future health and well-being of communities when they are located and managed appropriately. A number of these activities provide a significant contribution to the regional economy.</p>	<p><i>Otago's coast is a rich natural, cultural and economic resource that is under threat from a range of terrestrial and marine activities, the context identifies that the activities occurring within or affecting the coastal environment include land and marine based (e.g. aquaculture) <u>food and fibre production...</u></i></p> <p><i>Amend reference in Context that activities occurring within or affecting the coastal environment include land and marine based (e.g., aquaculture) food <u>and fibre production.</u></i></p>
<p>SRMR-19 Otago lakes are subject to pressures from tourism and population growth</p>	Support	<p>This issue recognises the potential impact that tourism can have on the agriculture. The term 'agriculture' may not capture all the types of primary production activity that this statement applies to. The term agriculture is inconsistently used throughout the pRPS which creates uncertainty.</p>	<p>Amend 'agriculture' to " the Primary Sector' throughout this Issue.</p>
<p>SRMR-110 – Economic and domestic activities in Otago use natural resources but do not always properly account for the environmental stresses or the future impacts they cause</p>	Oppose in part	<p>It is unclear what 'domestic activities' refers to in SRMS-110. No clarity is provided in the supporting discussion.</p> <p>In reading the context discussion, all environmental stresses appear to be as a result of economic activities, which is not correct. Other activities such as recreational activities can also have adverse effects. If the provision does not capture all activities, it risks not covering the field.</p>	<p>Delete the issue statement and replace with the following:</p> <p><i><u>SRMR-110 – The planning framework in Otago has at times and in some locations failed to manage and protect Otago's natural and physical resources, resulting in environmental stresses and unknown future impacts.</u></i></p> <p><i><u>Change reference to 'economic activities' to refer to 'activities'</u></i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>What is meant by 'properly account for'? Is this referring to the failure of the existing planning framework in Otago?</p> <p>The need for PC7 and PC8 to the Otago Water Plan, and the rushed proposed Otago RPS are clear demonstrations of this.</p> <p>Given it is the planning framework that provides the 'account', this issue should be focussed on that. Otherwise, the same mistakes could be made again in the future.</p>	<p><i>Amend Context paragraph 2 as follows:</i></p> <p><u>Delete first sentence and replace with</u></p> <p><u>"Activities that rely on natural and physical resources can adversely impact those resources if not appropriately managed or controlled. If these impacts are not managed or controlled the sustainability of the regions natural resources can be threatened. Equally long-term economic, social and cultural values can be compromised or threatened.</u></p> <p><u>Amend 'tipping point' to 'thresholds'</u></p> <p><u>Delete 'Business' from Impact Snapshot Social.</u></p>
<p>SRMR-I11 – Cumulative impacts and resilience – the environmental costs of our activities in Otago are adding up with tipping points potentially being reached</p> <p>- Statement</p>	<p>Oppose in Part</p>	<p>Support an issue statement on cumulative impacts and resilience. That statement should note the need for essential human health.</p> <p>'Threshold' is used in the IM – integrated management policies. For consistency it would be best if the term 'tipping point' be replaced with 'threshold' throughout the issue statement and supporting discussion.</p> <p>Also, the first line 'How and where we currently live is likely to change significantly in coming years' is not accurate across the region. Only those areas subject to extreme natural hazard risk are likely to change where they live. The</p>	<p>Amend SRMR- I11 Statement as follows:</p> <p><i>How and/or where we currently live is likely to change significantly over the long-term (2050). To respond to all the issues identified in this RPS, it is essential to consider changes to how we travel, the industries our economy relies on, the use we currently make of the natural and physical resources of the region, and how we provide for human health needs, personal and community well-being, all while protecting our natural environment.</i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>use of the phrase 'coming years' lacks clarity. It would be more useful to refer to 'long-term' which would align with the terminology in the NPSUD and Climate Change goals currently set for 2050. This would also provide greater guidance to the community regarding the time horizons that they should be contemplating with respect to this policy statement.</p> <p>The Impact Snapshot – Social and Economic introduces a range of terminology of uncertain origin and appears to create an expectation of environmental offsetting. It is not clear whether that is intended.</p>	<p><i>Replace 'tipping point' with 'threshold' throughout the SRMR.</i></p> <p><i>The Impact Snapshot – Social and Economic be redrafted so that's intent is clear and consistent language is used so as to avoid uncertainty.</i></p>
SRMR – IX	New	Add a new issue regarding the importance of the food and fibre sector	<p><i><u>The Food and Fibre Sector is facing a significant period of change due to climate change and the need to improve environmental outcomes.</u></i></p> <p><u>Statement:</u></p> <p><i><u>The Food and Fibre sector is essential to the New Zealand and Otago economy. New Zealand is renowned for producing high quality products capable of achieving a premium price and providing food and materials for domestic consumption. This generates significant benefits for our economy and communities. However, the sector faces some significant challenges in the short, medium and long-term driven by climate change, requirements to improve environmental outcomes and global consumer trends. Otago is</u></i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			<p><i>uniquely exposed to these challenges because of the profile of its economy. As such, particular attention needs to be paid to how change is managed.</i></p> <p>Context</p> <p><i>The food and fibre sector accounts for a significant proportion of the Otago economy. For example, in Central Otago District 14.7% of GDP, compared to the national average of 6.2%⁵. In the Clutha District, Agriculture, Forestry and Fishing make up 32.1% of GDP, and in the Waitaki District Agriculture, Forestry and Fishing make up 32.5% of GDP⁶. This presents risks and opportunities for the region. It means that if change is managed poorly the region will feel the impacts of this disproportionately, but the reverse is also true. Regardless, careful management of change within the sector is important so that communities are not unnecessarily impacted in a negative way. This includes the potential downstream impacts of a successful transition that have the potential to create other challenges such as pressure for urban growth and associated infrastructure.</i></p> <p><i>Impact snapshot</i></p> <p><i>Environmental</i></p>

⁵ Central Otago District Annual Economic Profile Report 2020, Infometrics Limited.

⁶ <https://ecoprofile.infometrics.co.nz>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			<p><u>The Food and Fibre sector cannot operate on a business as usual basis. Even in locations where water availability and water quality issues are not of concern adaptations will be necessary so that the sector is contributing to New Zealand's carbon zero 2050 commitments. However, demand for the products produced by the Food and Fibre Sector are likely to continue to increase and the ability of the sector to meet this demand will be critical to the wellbeing of the community, particularly with respect to the provision of nutrient dense food. It will be necessary for the sector to innovate to ensure it can meet the demands of the community while working within environmental limits. 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 forestry may adversely affect water availability, and irreversibly remove land from food production.</u></p> <p><u>Economic</u></p> <p><u>As highlighted above the Food and Fibre sector has a critical role in the national and regional economy. Ultimately a well-managed transition to more efficient production methods is likely to result in higher wages through demand for more highly skilled staff etc. In the interim though change has the potential to come at significant</u></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			<p><i>cost to the sector. Individual producers will have varying capacity to implement changes due to their current capital structure etc. Regulatory changes that significantly compromise productivity are likely to impact on land value which will affect the equity position of some businesses and hamper their ability to implement further changes. These issues reinforce the need for a well-managed transition that allows a degree of flexibility, particularly in the medium term.</i></p> <p><i>Social</i></p> <p><i>It is not just the economic benefits associated with primary production that are important. A thriving Food and Fibre Sector supports thriving rural communities ensuring these communities continue to have viable populations that support wider community activities including schools, recreational clubs, businesses etc.</i></p> <p><i>In recent years the rural community has faced significant pressure due to widespread concern about the effects of rural activities on the natural environment. These issues combined with the significant regulatory uncertainty arising as a result is having an adverse effect on the health and wellbeing of people within the rural sector. At its worst these pressures can result in suicide with suicide rates in rural communities significantly higher than in urban areas. This is another reason for ensuring that the transition</i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			<i>required within sector is carefully managed with consideration given to the capacity of the community to sustain change.</i>
IM – INTEGRATED MANAGEMENT			
IM-01- Long Term Vision	Oppose in Part	Support the need for a long term vision for integrated management, yet the wording does not fully capture the essence of the holistic nature of sustainability which is fundamental to an integrated approach.	Amend IM-01 Long Term Vision as follows; <i>The management of natural and physical resources in Otago, by and for the people of Otago, including Kāi Tahu, and as expressed in all resource management plans and decision making, achieves healthy, resilient, and safeguarded natural systems, and the ecosystem services they offer and supports the <u>social, cultural and economic well-being of present and future generations, (mō tātou, ā, mō kā uri ā muri ake nei).</u></i>
IM-03 – Environmentally Sustainable Impact	Oppose	The objective does not reflect the purpose of the Act, with a narrow focus on environmental integrity, form, function and resilience. It is not clear what these terms are intended to mean and therefore the Objective does not assist when considered along side IM-O1 and O2..	Delete IM-03 in its entirety
IM-04 – Climate Change	Support	Given the significance of the changes that are likely to be required to adapt to climate change the responses to this challenge will be many and varied. It is agreed that the community needs to understand and be supported in making the changes necessary.	Support
IM-P1 – Integrated Approach	Oppose in Part	This provision appears to be intended to provide procedural assistance to users of the	Amend IM-P1 Integrated Approach as follows:

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>RPS. Paragraph (1) does not achieve this because the RPS does not identify any measurable environmental constraints. Therefore it is impossible to achieve and does not assist people using the RPS.</p>	<p><i>The objectives and policies in this RPS form an integrated package, in which:</i></p> <p><i>(1) all activities are carried out within the environmental constraints limits and framework of this RPS,</i></p> <p><i>(2) all provisions relevant to an issue or decision must be considered,</i></p> <p><i>(3) if multiple provisions are relevant, they must be considered together and applied according to the terms in which they are expressed, and</i></p> <p><i>(4) notwithstanding the above, all provisions must be interpreted and applied to achieve the integrated management objectives IM-O1 to IM-O4.</i></p>
<p>IM-P2 Decision Priorities</p>	<p>Oppose</p>	<p>This provision establishes a hierarchy for management of the natural environment generally that does not reflect the purpose of the Act. It appears to have adopted the hierarchy from Clause 1.3(5) of the NPSFM. It is an incomplete articulation of the requirements of sustainable management.</p> <p>The Section 32 report "Action for healthy Waterways" specifically stated that the Objective of the NPSFM "does not anticipate blunt or strict prioritisation, which could be mis directed in achieving sustainable management"⁷. The same issue arises in relation to this provision in the pRPS.</p>	<p>Delete Provision</p>

⁷ Ministry for the Environment. Action for Healthy Waterways Section 32 Evaluation page 24

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
IM-P4 – Setting a Strategic Approach to ecosystem health	Oppose in Part	Whilst OWRUG generally supports taking a strategic and long term approach to ecosystem health this provision goes a steps too far. Intrinsic values of ecosystems is a matter to which regard should be had as per section 7 of the RMA.	<p>Amend IM-P4 Setting a Strategic Approach to Ecosystem Health as follows;</p> <p>IM-P4 – Setting a strategic approach to ecosystem health</p> <p>Healthy ecosystems and ecosystem services are achieved through a planning framework that:</p> <ol style="list-style-type: none"> (1) protects <i>has regard to their intrinsic values,</i> (2) takes a long-term strategic approach that recognises changing <i>environments,</i> (3) recognises and provides for ecosystem complexity and interconnections, and (4) anticipates, or responds swiftly to, changes in activities, pressures, and trends.
IM-P6 – Acting on best available information		<p>ORWUG supports an evidence based decision making approach in the context of robust scientific data, particularly given previous experience of rushed or incomplete planning determinations based on inadequate science.</p> <p>While there is a balance between quality of data and avoiding unnecessary delays, we are concerned that the current wording of IM-P6</p>	<p>Amend as follows (or similar):</p> <p>Avoid unreasonable delays in decision-making processes <i>Decision making is informed by complete and scientifically robust data or, where obtaining such data is not practicable, by consideration of best available information including modelling, by using the best information available at the time,</i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		places too much emphasis on quick decision making and not enough emphasis on reliable data. This would also be consistent with NPSFM clause 1.6.	<i>including but not limited to mātauraka Māori, local knowledge, and reliable partial data.</i>
IM-P9 – Community response to climate change impacts	Oppose in Part	<p>It is unclear who is responsible for establishing community responses, and where they might sit within a planning framework. Many sectors, including the food and fibre sector are already transitioning to operate within a low emissions economy.</p> <p>OWRUG also has concerns around the use of the year 2030, which does not take into account time for plan changes to make changes, particularly in terms of the time frame for the pRPS to become operative (and consequently, time for local authorities to prepare or amend their plans).</p> <p>OWRUG seek that the pRPS provisions clearly recognise and control the potential impacts of land use change to afforestation on water yield and river flows. The need for community responses that will help build resilience to climate change such as water storage.</p>	<p>Amend IM-P9 Community response to climate change impacts as follows;</p> <p><i>By 2030 Otago's communities have shall established responses for adapting to the impacts of climate change, including provision for how they are adjusting their lifestyles to follow them, and are-reducing their greenhouse gas emissions to achieve net-zero carbon emissions by 2050.</i></p>
IM-P10 – Climate change adaptation and mitigation	Oppose in Part	The impacts of climate change are significant for Otago's rural water users, including	Amend IM-P10 Climate change adaptation and mitigation as follows;

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>drought, flooding and likely changes in pasture composition and intensification with uncertain impacts on animal productivity and nutrient balances.</p> <p>Given this, Policy IM-P10 should recognise and prioritise adaptation and mitigation methods over all timescales to support resilience in rural communities. For example, increasing water storage capacity to continue existing land use practices whilst trialling different crops that are better suited to new climatic conditions.</p>	<p>...</p> <p><u>(4) provide short, medium and long term measures that enable rural communities to adapt and provides certainty to support the investment required to implement change.</u></p>
<p>IM-P11 – Enhancing environmental resilience to effects of climate change</p>	<p>Oppose in part</p>	<p>Provisions fail to acknowledge that environmental resilience may be improved by human intervention.</p>	<p>Amend IM-P11 Enhancing environmental resilience to effects of climate change as follows:</p> <p>Enhance environmental resilience to the adverse effects of climate change by facilitating activities that reduce human impacts on the environment <u>support this.</u></p>
<p>IM-P12 – Contravening environmental bottom lines for climate change mitigation</p>	<p>Oppose in part</p>	<p>This provision appears to be a reflection of the possible provisions included in the exposure draft of the Natural and Built Environments Bill, which (if passed) will represent an overhaul of resource management in New Zealand. Given that it is not clear whether this provision achieves the purpose of the RMA, or can be reconciled with other highly directive provisions within the relevant NPS's or this pRPS.</p>	<p>Delete IM-P12</p> <p>OR</p> <p>Amend to be consistent with the purpose of the Resource Management Act.</p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
IM-P13 – Managing Cumulative Effects	Oppose	<p>There is a need to ensure that cumulative effects are considered as set out in Section 3 RMA. There is also an obligation to ensure lower order planning documents also have regard to cumulative effects.</p> <p>As drafted IM-P13 would be very difficult to apply as cumulative effects by their very nature are not always able to be 'explicitly accounted' for.</p> <p>It is the term 'explicitly accounting' that may give rise to an impossible position.</p> <p>OWRUG do not consider that this provision is necessary</p>	Delete IM-P13.
IM-P14 – Human Impact	Oppose	<p>As with IM-P12 this provision appears to be an attempt to pre-empt legislative change pursuant to the Natural and Built Environment Bill. Given the pRPS is notified pursuant to the RMA it must achieve the purpose of that Act.</p> <p>Further the directions within the policy appear to relate to plan making functions. If the provision is to be retaining this should be made clear. It is unclear how or who is intended to implement and apply this policy, which is likely to create significant uncertainty around its intended interpretation, and purpose.</p> <p>Identify that limit setting is primarily a function of plans, policy should be clear that is what it is focused on.</p>	<p>Delete IM-P14 Human Impact or amend as follows:</p> <p>Preserve opportunities for future generations by <i>when preparing Regional and District Plans</i>:</p> <p>(1) identifying limits to both growth and adverse effects of human activities beyond which the <i>environment</i> will be degraded,</p> <p>(2) requiring that activities occur within those limits, are established in places, and carried out in ways, that are within those limits and are compatible with the natural capabilities and capacities of the</p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			<p>resources they rely on, and</p> <p>(3) regularly assessing and adjusting limits and thresholds for activities over time in light of the actual and potential environmental impacts.</p>
IM-P15 – Precautionary Approach	Oppose	<p>The policy requires a precautionary approach be adopted, yet the need for this policy is unclear when the pRPS already adopts the same precautionary approach.</p> <p>The policy directs that such an approach should be applied particularly where the areas and values within Otago have not been identified in plans as required by the pRPS. However, if the pRPS does not identify these values and the lower order planning documents have not yet done so the policy potentially operates as a holding pattern. This could prevent activities that achieve the purpose of the Act from commencing which is not considered reasonable or appropriate.</p>	Delete IM-P15- Precautionary Approach
IM-M5 – Other Methods	Oppose in Part	<p>Farming businesses have been amongst the first to grapple with both the effects of climate change, such as flooding and drought, as well as the requirements of New Zealand’s national and international climate commitments.</p> <p>Farming takes its climate obligations and the nuances of its climate response seriously. This method should reflect that there is a difference between short term climate gases</p>	<p>Amend IM-M5 as follows;</p> <p><i>Local authorities should:</i></p> <p>(1) <i>at their next plan review or by December 2030, whichever is sooner, align (to the extent possible) all strategies and management plans prepared under other legislation to contribute to the attainment of the long-term vision for Otago, and</i></p> <p>(2) <i>facilitate community involvement in</i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>such as methane, primarily produced by agriculture, and long-term climate gases such as carbon dioxide, and nitrous oxide.</p> <p>OWRUG requests acknowledgment of the most appropriate and practical solution to climate change in Otago – appropriate water storage.</p>	<p><i>realising the long-term vision for Otago stated in IM-O1 through non-regulatory means,</i></p> <p><i>(3) encourage and facilitate changes to activities that will enable activities to function in a net-zero carbon economy, and</i></p> <p><i>(4) advocate for and incentivise activities that reduce, mitigate, or eliminate risk of environmental degradation.</i></p> <p><i>(5) <u>Enable appropriate water storage solutions to mitigate the effects of climate change</u></i></p>
IM – E1 – Explanation	Oppose in Part	IM-E1 – Explanation reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to IM-E1 to give effect to the relief sought above.
IM-PR1 – Principal Reasons	Oppose in Part	<p>Use of language such as ‘enshrine’ is not appropriate for an RPS.</p> <p>IM-PR1 – Principal reasons reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.</p>	<p>Amend IM-PR1- Principal Reasons as follows;</p> <p><i>The provisions seek to enshrine an explicit recognition and implementation of these facets into plan making and resource consenting processes. They set an expectation of integrated resource management that flows through to all other provisions of the RPS, and informs the limits and thresholds we set on human activities for protecting environmental health. It sets explicit expectations that local authorities will work with each other and with other agencies to ensure management</i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			<p><i>approaches are clear, coordinated, and able to support Otago's communities into the future.</i></p> <p>And</p> <p>Consequential amendments to IM-PR1 to give effect to the relief sought above.</p>
Anticipated environmental results IM-AER1 to 4	Oppose in Part	IM-AER1 to 4 – Anticipated environmental results reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to IM-AER1 to IM-AER4 to give effect to the relief sought.
LF – LAND AND FRESHWATER			
LF-WAI-01 – Te Mana o te Wai	Oppose in part	<p>Support an objective to achieve the fundamental concept of Te Mana o te Wai, as this is consistent with the obligation set out in the NPSFM. However, the objective is not a faithful articulation of the fundamental concept as set out in NPSFM.</p> <p>The concept as articulated in the NPSFM recognises protecting the health of freshwater protects the health and wellbeing of the wider environment and mauri. It is a water centric concept. Mauri is an inappropriate measure for the achievement of this objective due to the difficulties in objectively assessing it..</p> <p>In the NPSFM the term 'restoring' is used in the context of achieving balance between the</p>	<p>Amend LF-WAI – Te Mana o te Wai as follows:</p> <p><i>The health and wellbeing of Otago's water bodies is protected, and improved where is it degraded, and the management of the land and water recognises and reflects that:</i></p> <p>(1) <i>Protecting the health of water protects the wider environment and the mauri of water;</i></p> <p>(2) <i>Water is the foundation and source of all life...</i></p> <p>...</p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>The reference to the health needs of people is important. It aligns with the purpose of the RMA sustainable management <i>means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while.</i></p>	<p>resources and bathing), and</p> <p>(3) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.</p> <p>LF-WAI-P2 is strongly linked to P1 and OWRUG is therefore interested in any amendments that may be made that may affect P2.</p>
<p>LF-WAI-P3 – Integrated management/ki uta ki tai</p>	<p>Oppose in part</p>	<p>Policy 3 sets out a need to manage the use of fresh water and land in accordance with tikaka and kawa. As this provision appears to apply to resource users reference to tikanga and kawa is considered misplaced. The framework for those principles is set out in the Mana Whenua provisions and relates specifically to the Crown/Iwi relationship. Including it in these provisions creates uncertainty.</p> <p>The provision also needs to identify the need to sustain primary production which is also reliant on land and water. Managing the effects of use and development does not adequately address the needs of the food and fibre sector.</p>	<p>Amend LF-WAI-P3 as follows:</p> <p>Manage the use of <i>fresh water and land</i> in accordance with tikaka and kawa, using an integrated approach that:</p> <p>(1) recognises and sustains the connections and interactions between <i>water bodies</i> (large and small, surface and ground, fresh and coastal, permanently flowing, intermittent and ephemeral),</p> <p>(2) sustains and, wherever possible, restores the connections and interactions between <i>land</i> and water, from the mountains to the sea,</p> <p>(3) sustains and, wherever possible, restores the habitats of mahika kai and</p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>The policy and pRPS would be improved by stating that regard is also had to the need to reduce emissions. This aligns and reinforces IM-P9 – Community response to climate change impacts:</p> <p>The provision also does not recognise that the use of water may support the shift to carbon zero 2050.</p>	<p>indigenous species, including taoka species associated with the <i>water body</i>,</p> <p><u>(3A) sustains food and fibre production to provide for the social, cultural, economic and health needs of the community</u></p> <p>(4) manages the <i>effects</i> of the use and development of <i>land</i> to maintain or enhance the health and well-being of <i>fresh water</i> and <i>coastal water</i>,</p> <p>(5) encourages the coordination and sequencing of regional or urban growth to ensure it is sustainable,</p> <p>(6) has regard to foreseeable <i>climate change risks</i>, and</p> <p><u>(6A) has regard to the need to reduce emissions that contribute to climate change including enabling changes to activities that will contribute to emission reductions.</u></p>
<p>LF-WAI-P4 – Giving effect to Te Mana o te Wai</p>	<p>Oppose</p>	<p>This provision appears to be an effort to override statutory tests and abdicate responsibility for giving effect to Te Mana o te Wai. Under section 67(3) of the RMA the pRPS must achieve that outcome, as will any Regional or District Plan to follow.</p> <p>However, with respect to assessment of resource consents under section 104 the test</p>	<p>Delete policy.</p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>under the RMA is 'have regard to'. The importance of the LF-WAI provisions is apparent from their drafting.</p> <p>The policy also appears to cut across IM-P1.</p>	
LF-WAI-E1 – Explanation	Oppose in Part	<p>There is nothing in the explanation that recognises the importance that water plays in providing for community well-being, including supporting the food and fibre sector.</p>	<p>Amend paragraph 3 as follows: <i>The mauri expresses mana and connection for which can only be defined by mana whenua.</i></p> <p>Amend paragraph 5 as follows: <i>Kawa and tikaka have been developed over the generations, based on customs and values associated with the Māori world view that span the generations, recognising and honouring Implementing Te Mana o te Wai and upholding to protect the health of freshwater upholds the mauri of the wai and is consistent with this value base.</i></p> <p>Add the following paragraph: <i>Water is valued by the community for a wide variety of reasons. Including productive and recreational values. The ability to utilise water for productive purposes supports a significant proportion of the Otago economy with associated downstream economic and social activity. Water also provides the food and fibre sector with an important resource to build resilience against adverse events including flooding and drought. Access to water, within appropriate environmental limits is an important contributor achieving social, cultural and economic wellbeing within Otago.</i></p>
LF-WAI-PR1 – Principal reasons	Oppose in Part	<p>The principal reasons do not correctly articulate the fundamental concept of Te</p>	<p>Amend LF-WAI-PR1 as follows:</p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		Mana o te Wai from the NPSFM. It suggests a strict prioritisation which is not reflected in the fundamental concept when considered as a whole.	In accordance with the NPSFM, councils are required to implement a framework for managing <i>freshwater</i> that gives effect to <i>Te Mana o te Wai</i> . This places the mauri (life force) of the water at the forefront of decision making, recognising te hauora o te wai (the health of the water at the forefront of decision making so that it may <i>is the first priority, and support te hauora o te taiao (the health of the environment and te hauora o te takata (the health of the people .It is only after the health of the water is sustained that water can be used for economic purposes. ...</i>
LF-WAI-AER1 to AER2 – Anticipated environmental results	Oppose in Part	LF-WAI-AER1 to 2 – Anticipated environmental results reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to LF-WAI-AER1 to LF-WAI-AER2 to give effect to the relief sought. Amend LF-WAR-AER2 as follows: The mauri of Otago's water bodies and their health and well-being <i>of Otago's water bodies is protected.</i>
New AER		The current anticipated environmental results (AER) do not reflect the whole concept of Te Mana o te Wai	<i><u>There is balance achieved between water, the wider environment and the community that allows the community to be healthy and provide for its social economic and cultural wellbeing.</u></i>
LF-VM VISIONS & MANAGEMENT			
LF-VM-02 Clutha Mata-Au FMU Vision	Support in Part	OWRUG support the purpose/intent of the visions, but with changes to more accurately reflect the importance of the food and fibre sector within the FMU, including the importance of irrigation and water storage which enable food production, while also	Amend LF-VM-02 Clutha Mata-Au FMU Vision as follows; <i>In the Clutha Mata-au FMU:</i> <i>(1) management of the FMU recognises</i>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>supporting sustainable land and water management practices.</p> <p>The vision as drafted also fails to accurately capture the broad range of economic activities which form part of the rural environment, including forestry and horticulture. OWRUG support the use of the term food and fibre sector to capture the broad range of uses within the FMU.</p> <p>The NPSFM expects visions to express what communities and tangata whenua want the FMU, part of the FMU or catchment to be like in the future. Therefore, where the community has expressed a desire for water to be allocated to support production (for example) this must be captured in the vision. The draft vision has failed to do that and as such fails to give effect to the NPSFM.</p> <p>The vision did not accurately reflect the outcome of the community consultation undertaken which the development of these visions relied upon (as mentioned in LF-VM-PR2)</p>	<p><i>that:</i></p> <p><i>(a) the Clutha Mata-au is a single connected system ki uta ki tai, and</i></p> <p><i>(b) the source of the wai is pure, coming directly from Tawhirimatea to the top of the mauka and into the awa,</i></p> <p><i>(2) fresh water is managed in accordance with the LF-WAI objectives and policies,</i></p> <p><i>(3) the ongoing relationship of Kāi Tahu with wāhi tūpuna is sustained,</i></p> <p><i>(4) water bodies support thriving mahika kāi and Kāi Tahu whānui have access to mahika kāi,</i></p> <p><i>(5) indigenous species migrate easily and as naturally as possible along and within the river system,</i></p> <p><i>(6) the national significance of the Clutha hydro-electricity generation scheme is recognised,</i></p> <p><i>(7) <u>Water is allocated to the food and fibre sector support sustainable production and the sectors contribution to social and economic wellbeing of the community.</u></i></p> <p><i>(8) in addition to (1) to (6) above:</i></p> <p><i>(a) in the Upper Lakes rohe, the high quality waters of the lakes and their tributaries are protected, recognising the significance of the purity of these waters to Kāi Tahu and to the wider community,</i></p> <p><i>(b) in the Dunstan, Manuherekia and</i></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			<p><i>Roxburgh rohe:</i></p> <ul style="list-style-type: none"> <i>(i) flows in water bodies sustain and, wherever possible, restore the natural form and function of main stems and tributaries to support Kāi Tahu values and practices, and</i> <i>(ii) innovative and sustainable land and water management practices support food <u>production the food and fibre sector</u> in the area and reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and</i> <i>(iii) sustainable abstraction <u>consistent with NOF values</u> occurs from main stems or groundwater in preference to tributaries <u>where practicable,</u></i> <i>(iv) <u>the role of water storage is recognised as being fundamental to the food and fibre sector, and an essential part of meeting the vision as set out in (1) to (7) above.</u></i> <p><i>(c) in the Lower Clutha rohe:</i></p> <ul style="list-style-type: none"> <i>(i) there is no further modification of the shape and behaviour of the water</i>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			<p>bodies and opportunities to restore the natural form and function of water bodies are promoted wherever possible,</p> <p>(ii) the ecosystem connections between freshwater, wetlands and the coastal environment are <u>protected</u> preserved and, wherever possible, restored,</p> <p>(iii) land management practices reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and</p> <p>(iv) there are no direct discharges of wastewater to water bodies, and</p> <p>(9) the outcomes sought in (78) are to be achieved within the following timeframes:</p> <p>(a) by 2030 in the Upper Lakes rohe,</p> <p>(b) by 2045 in the Dunstan, Roxburgh and Lower Clutha rohe, and</p> <p>(c) by 2050 in the Manuherekia rohe.</p>
<p>LF-VM-04 Taieri FMU Vision</p>	<p>Support in Part</p>	<p>OWRUG support the purpose/intent of the visions, but with changes to more accurately reflect the importance of the food and fibre sector within the FMU, including the importance of irrigation and water storage which enable food production, while also supporting sustainable land and water management practices.</p>	<p>Amend LF-VM-04 Taieri FMU Vision as follows</p> <p><i>By 2050 in the Taieri FMU:</i></p> <p>(1) fresh water is managed in accordance with the LF-WAI objectives and policies,</p> <p>(2) the ongoing relationship of Kāi Tahu</p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>The vision as drafted also fails to accurately capture the broad range of economic activities which form part of the rural environment, including forestry and horticulture. OWRUG support the use of the term food and fibre sector to capture the broad range of uses within the FMU.</p> <p>The NPSFM expects visions to express what communities and tangata whenua want the FMU, part of the FMU or catchment to be like in the future. Therefore, where the community has expressed a desire for water to be allocated to support production (for example) this must be captured in the vision. The draft vision has failed to do that and as such fails to give effect to the NPSFM.</p> <p>The vision did not accurately reflect the outcome of the community consultation undertaken which the development of these visions relied upon (as mentioned in LF-VM-PR2)</p>	<p><i>with wāhi tūpuna is sustained,</i></p> <p>(3) <i>healthy wetlands are restored in the upper and lower catchment wetland complexes, including the Waipori/Waihola Wetlands, Tunaheketaka/Lake Taieri, scroll plain, and tussock areas,</i></p> <p>(4) <i>the gravel bed of the lower Taieri is restored and sedimentation of the Waipori/Waihola complex is reduced</i></p> <p>(5) <i>creative ecological approaches contribute to reduced occurrence of didymo,</i></p> <p>(6) <i>water bodies support healthy populations of galaxiid species,</i></p> <p>(7) <i>there are no direct discharges of wastewater to water bodies, and</i></p> <p>(8) <u><i>Water is allocated to the food and fibre sector support sustainable production and the sectors contribution to social and economic wellbeing of the community.</i></u></p> <p>(9) <u><i>the role of water storage is recognised as being fundamental to the food and fibre sector, and an essential part of meeting the vision as set out in (1) to (8) above.</i></u></p>
LF-VM-M3 – Community Involvement	Support in Part	OWRUG supports the commitment to community involvement in achieving the objectives and policies but would strongly encourage the ORC to engage in a more collaborative and meaningful way than has previously been the case.	Amend LF-VM-M3 Community Involvement as follows;

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>OWRUG also suggest that water storage be captured in the methods as water storage is likely to have a role to play in the future in terms of meeting the vision of the FMU's, as well as water quality and climate change objectives.</p>	<p><i>Otago Regional Council must work with communities to achieve the objectives and policies in this chapter, including by:</i></p> <ol style="list-style-type: none"> <i>(1) <u>engaging and partnering</u> with communities to identify environmental outcomes for Otago's FMUs and rohe and the methods to achieve those outcomes,</i> <i>(2) <u>encouraging community stewardship, including through catchment groups</u> of water resources and programmes to address freshwater issues at a local catchment level,</i> <i>(3) <u>supporting community initiatives, including water storage</u>, that contribute to maintaining or improving the health and well-being of water bodies, and</i> <i>(4) <u>supporting industry-led guidelines, codes of practice and environmental accords</u> where these would contribute to achieving the objectives of this RPS</i>
LF-VM-E2 – Explanation	Oppose in Part	LF-VM-E2 – Explanation reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to LF-VM-E2 to give effect to the relief sought.
LF-VM-PR2 – Principal Reasons	Oppose in Part	LF-VM-PR2 – Principal reasons reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to LF-VM-PR2 to give effect to the relief sought.
LF-VM-AER3 – Anticipated Environmental Outcomes	Oppose in Part	LF-VM-AER3 – Anticipated environmental results reflects the objectives, policies and methods in this chapter, and so consequential	Consequential amendments to LF-VM-AER3 to give effect to the relief sought.

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		changes may be required to give effect to the relief sought.	
LF-LW – FRESH WATER			
LF-FW-O8 Fresh water	Oppose in part	<p>OWRUG consider there is a need to refer to the 'social, economic, and cultural well-being of people and communities' in Clause (1) to align more accurately with the hierarchy of obligations in the NPSFM.</p> <p>There is a need to amend (2) to reflect that in some places surface water flow naturally disconnects and that it is not always hydrologically possible or representative of the range of waterbodies within a system particularly where that includes ephemeral and intermittent waterways.</p> <p>The objective also requires amendment to reflect the communities desire for allocation to be provided for.</p>	<p>Amend LF-FW-O8 as follows:</p> <p>In Otago's <i>water bodies</i> and their catchments:</p> <p>(1) the health of the wai supports the health of the people and thriving mahika kai, <u>and the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future,</u></p> <p>(2) <u>water flow is continuous throughout the whole system, where this is consistent with the natural system;</u></p> <p>Add following clause at (6)</p> <p><u>"sustainable and integrated water allocation and abstraction supports food and fibre production."</u></p>
LF-FW-P7 Fresh water	Oppose in part	<p>Clause (3) sets timeframes by which specified rivers and lakes must be suitable for primary contact. OWRUG support the outcome that specified rivers and lakes are safe for swimming, but are concerned that the timeframes and targets, in particular for rivers, are not scientifically robust, achievable and backed up by evidence in the s32 report. Further, communities, including the food and fibre sector, may face considerable costs to</p>	<p>Amend Clause (3) of Policy LF-FW-P7 to align with national targets – 80% by 2030 for specified rivers and lakes, and 95% by 2040.</p> <p>Amend LF-FW-P7 as follows</p> <p>6. <i>fresh water</i> is allocated within environmental limits, and</p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>achieve these goals which necessitates carefully managed transition. .</p> <p>The nationwide target is to achieve, by 2030, the target for 80% of specified rivers and lakes, and to achieve 90% by 2040.</p> <p>Without sufficient evidence to indicate a contrary position is justified or achievable, amendments should be made.</p> <p>In relation to clause (6) efficient water use should be considered in light of the waterbody and landuse that it is intended to be used for. The drive to the use of efficient spray irrigation can have other consequences, such as the need to intensify to support the increased capital and operating costs. This intensification can have other adverse effects that are undesirable.</p>	<p>7. <u>Freshwater is used efficiently taking in to account the nature of the waterbody that water is to be taken from and the land-use activity the water will be used for.</u></p>
<p>LF-FW-P12 Protecting outstanding water bodies</p>	<p>Oppose in part</p>	<p>Generally, infrastructure will have functional and locational requirements that can dictate, or at least place limitations on where it can occur. It may not be possible to avoid adverse effects entirely, particularly if the infrastructure is existing and is within an 'outstanding water body'. As such it would be appropriate to manage the effects of</p>	<p>Amend Policy LF-FW-P12 as follows: <u>(3) recognising that for infrastructure, EIT-INF-P13 applies instead of LF-FW-P12.</u></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>infrastructure developments by applying the effects mitigation hierarchy.</p> <p>Policy EIT-INF-P13 provides direction for locating and managing effects of infrastructure on outstanding water bodies, and so it is considered appropriate to defer to that policy for infrastructure.</p>	
<p>LF-FW-P13 Preserving natural character</p>	<p>Oppose in part</p>	<p>Generally, infrastructure will have functional and locational requirements that can dictate, or at least place limitations on where it can occur. It may not be possible to avoid adverse effects entirely, particularly if the infrastructure is existing and is within a river. As such it would be appropriate to manage all effects of infrastructure developments by applying the effects mitigation hierarchy.</p> <p>Policy EIT-INF-P13 provides direction for locating and managing effects of infrastructure on areas of high or outstanding natural character, and so it is considered appropriate to defer to that policy for infrastructure.</p> <p>Clause (3) combines the setting of environmental flow with natural character.</p> <p>Flow within rivers is the key variable for most other processes that occur within a river, and as such, environmental flow setting deserves objectives and policies of its own, separate from natural character, although natural</p>	<p>Amend Policy LF-FW-P13 as follows:</p> <p><u>(3) recognising that for infrastructure, EIT-INF-P13 applies instead of LF-FW-P13.</u></p> <p>Delete Clause (3) of LF-FW-P13 and add a new flow setting policy as below:</p> <p><u>NEW: Policy LF-FW-FS1</u></p> <p><u>“Set environmental flow regimes within Otago lakes and rivers in accordance with the FMU objectives and the NOF limit setting process in Appendix 1 of the National Policy Statement for Freshwater Management 2020”</u></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		character is a consideration when undertaking flow setting.	
LF-FW-P14 – Restoring natural character	Oppose in Part	<p>In some cases in Otago natural character of water bodies has been affected by the establishment of large infrastructure. In particular hydro-electricity or irrigation dams. Those developments have significantly and likely irreversibly altered the waterbodies in question.</p> <p>Equally the infrastructure itself has created resources that are now valued by the community. Such as large water bodies good for recreation.</p> <p>This needs to be acknowledged when considered the 'natural character' that needs to be restored.</p> <p>It is considered that clause 5 can be deleted as it appears to effectively repeat (1). If that is not the case its meaning is unclear.</p>	<p>Amend Clause (1) of LF-FW-P14 as follows:</p> <p>(1) restore a form and function that reflect the natural behaviours of the <i>water body</i>, <u>recognising where applicable the effect that infrastructure may have had on the form and function of the water body.</u></p> <p>And</p> <p>Delete Clause (5) of LF-FW-P14.</p>
LF-FW-M6(6) Regional plans	Support with amendments	<p>OWRUG supports Policy LF-FW-M6 (6) in its requirement for regional plan provisions to provide for off-stream storage of surface water, as this will improve the security of water supplies for irrigation. It is also considered necessary to provide for onstream storage in this method. Whilst it may not be enabled to the same degree as off stream, there are likely to be circumstances where it is appropriate.</p>	<p>Retain Clause (6) of Policy LF-FW-M6 and amend to refer of onstream storage also.</p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
LF-VM-E2 – Explanation	Oppose in Part	LF-VM-E2 – Explanation reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to LF-VM-E2 to give effect to the relief sought.
LF-VM-PR2 – Principal Reasons	Oppose in Part	LF-VM-PR2 – Principal reasons reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to LF-VM-PR2 to give effect to the relief sought.
LF-VM-AER3 – Anticipated Environmental Outcomes	Oppose in Part	LF-VM-AER3 – Anticipated environmental results reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to LF-VM-AER3 to give effect to the relief sought.
LF-LS – LAND AND SOIL			
LF-LS-O11 Land and Soil	Oppose in part	OWRUG supports the safeguarding of the life supporting capacity of soils and the availability and productive capacity of land for primary production. However, Objective LF-LS-O11 should apply to all land for food and fibre production, and not highly productive land only. Food and fibre sector production, in particular secure food supply and security are essential to human health needs which are to be provided for through sustainable resource management.	Amend LF-LS-O11 as follows: <i>The life-supporting capacity of Otago's soil resources is safeguarded and the availability and productive capacity of highly productive land for <u>primary Food and Fibre Sector</u> production is maintained now and for future generations.</i> And include a definition for 'Food and Fibre Sector' as sought under Interpretation section of this submission.
LF-LS-O12 Use of land	Support	OWRUG supports the objective to maintain soil quality as it is an important value for productive use.	Retain LF-LS-O12
LF-LS-P16 Integrated management	Support	The interconnections between soil health, vegetative cover and water quality and quantity are important for maintaining soil quality.	Retain LF-LS-P16

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
LF-LS- P17 Soil values	Support with amendments	Maintenance of the productive potential of soils is critical.	<p>Amend LF-LS-P17 as follows:</p> <p>Maintain the mauri health, <u>well-being</u> and productive potential of soils by managing the use and development of <i>land</i> in a way that is suited to the natural soil characteristics and that sustains healthy:</p> <ol style="list-style-type: none"> (1) soil biological activity and <i>biodiversity</i>, (2) soil structure, and (3) soil fertility.
LF-LS- P18 Soil erosion	Support	OWRUG supports the promotion of activities that enhance soil retention. This would include irrigation of land for food and fibre production.	Retain LF-LS-P18
LF-LS -P19 Highly productive land	Oppose in part	OWRUG supports maintaining the availability and productive capacity of highly productive land. The policy sets out a number of criteria for the identification of highly productive land but is dependent on the development of the Land and Water Regional Plan by December 2023 to implement the policy. However, until such time there is a lack of clarity as to how HPL policies may be applied. The pNPS-HPL has a default definition for HPL in the interim and a similar approach is sought in the pRPS as highly productive land is already under	Retain LF-LS -P19 but include a definition for 'highly productive land' as sought under Interpretation section of this submission.

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		pressure from urban and rural residential development.	
LF-LS-P21 Land use and fresh water	Oppose in part	Clause (1) of Policy LF-LS-P21 always requires the reduction in contaminants. This differs to the main body of the policy that directs improvement or maintenance. Maintenance would be appropriate if the environmental outcomes set for the relevant Freshwater Management Unit are currently being met.	Amend clause (1) of Policy LF-LS-P21 as follows: (1) <u>where improvement is required</u> , reducing direct and indirect discharges of contaminants to water from the use and development of land, and ... Consideration should also be given to including a provision encouraging the adoption of good practice measures.
LF-LS-M11 Regional plans	Oppose in part	LF-LS-M11 requires Otago Regional Council to implement Policy LF-LS-P19 but is not clear if this includes mapping the areas identified as highly productive land in the Land and Water Regional Plan. This is an important part of achieving LF-LS-P19.	Amend LF-LS-M11 by adding: 4) <u>identify and map highly productive land.</u>
LF-LS-E4 – Explanation	Oppose in Part	LF-LS-E4 – Explanation reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to LF-LS-E4 to give effect to the relief sought.
LF-LS-PR4 – Principal Reasons	Oppose in Part	LF-LS-PR4 – Principal reasons reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to LF-LS-PR4 to give effect to the relief sought. Including the following: In Otago, historical and contemporary <i>land</i> uses have <i>degraded</i> some <i>water bodies</i> , both in

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			terms of their quantity and quality, leading to adverse effects on the health mauri of water and the diversity and abundance of mahika kai resources.
LF-LS-AER12 to 14 – Anticipated environmental results	Oppose in part	LF-LS-AER12 to 14 – Anticipated environmental results reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to LF-LS-AER12 to 14 to give effect to the relief sought.
DOMAINS & TOPICS			
EIT – ENERGY, INFRASTRUCTURE AND TRANSPORT			
EIT-INF-05 Integration	Oppose in part	The integration of development of Nationally and Regionally significant infrastructure is supported. However, other infrastructure also requires integrated development.	Amend EIT-INF-05 to refer to infrastructure generally.
EIT-INF-06 Long term planning for electricity transmission infrastructure	Oppose in part	There are at least 13 definitions relating to infrastructure in the Plan – but electricity transmission is not one of them. Therefore, it is not clear what the objective is seeking to address, whether it is the national grid or the wider electricity network. It is expected that changes towards a low emissions economy will place greater demands on the electricity network, therefore planning for this and enabling development is supported. However, there are other types of infrastructure that may be required for these purposes (e.g. irrigation infrastructure). The nature of infrastructure is such that it requires long-term planning. Infrastructure is generally very costly and is intended to have an	Amend EIT-INF-06 to refer to infrastructure generally.

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		extended life. It would therefore be appropriate for this provision to apply to infrastructure generally. Good infrastructure supports the health and well-being of communities.	
EIT-INF-P10 – recognising resource requirements EIT-INF-P11 Operation and maintenance EIT-INF-P12 Upgrades and Development Amend EIT-INF-E2 – Explanation	Oppose in part	The nature of infrastructure is such that it requires long-term planning and certainty with respect to resources. Infrastructure is generally very costly and is intended to have an extended life. It would therefore be appropriate for this provision to apply to infrastructure generally. Good infrastructure supports the well-being of communities.	Amend EIT-INF-P10-P12 to refer to infrastructure generally. Amend EIT-INF-E2 paragraph 1 line 5 to refer to infrastructure generally.
EIT-INF-13 Locating and managing effects of infrastructure And related provision ECO-P4 and ECO-P6	Oppose in part	For infrastructure that is not nationally or regionally significant the current drafting potentially operates as a prohibition on development within areas identified in clause (1)(a)-(h). Generally infrastructure will have functional and locational requirements that can dictate, or at least place limitations on where it can occur. It may not be possible to avoid adverse effects entirely. As such it would be appropriate to allow infrastructure developments access and effects mitigation hierarchy.	Amend EIT-INF-P13(2) as follows: <i>“If it is not possible to avoid locating in the areas list in (1) above because of the functional or operational needs of the infrastructure manage effects as follows:</i> <ul style="list-style-type: none"> <i>(a) in significant natural areas in accordance with ECO-P6,</i> <i>(b) In natural wetlands in accordance with the relevant provisions of the NESF</i> <i>(c) In other areas listed in EIT-INF-p13(1) above in accordance with the effects management hierarchy (other matters).</i> Add new definition of <i>“Effects Management Hierarchy (other matters) means an approach to managing the adverse effects (including cumulative effects and loss of potential value) of an activity on the extent or values of a, outstanding natural feature or landscape,</i>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
			<p><i>outstanding water bodies (excluding natural wetlands), area of high or outstanding natural character, area or place of significant or outstanding historic heritage, wahi tapu, wahi taoka, areas with protected customary rights, and areas of high recreational and high amenity value that requires that:</i></p> <ul style="list-style-type: none"> <i>(a) Adverse effects are avoided where practicable,</i> <i>(b) Where adverse effects cannot be avoided, they are minimised where practicable,</i> <i>(c) Where adverse effects cannot be minimised, they are remedied where practicable,</i> <i>(d) Where adverse effects cannot be remedied, they are mitigated to the extent practicable,</i> <i>(e) Where more than minor adverse effects cannot be avoided, minimised, remedied or mitigated offsetting and/or environmental compensation must be considered, where appropriate.</i> <p>Amend ECO-P4(1) to refer to infrastructure generally.</p> <p>Amend ECO-P6 so that there is consistency between the effects management hierarchies.</p>
EIT-INF-M4 Regional plans EIT-INF-M5 District Plans	Oppose in part	Requiring prioritisation of sites where adverse effects can be avoided or minimised does not allow adequate recognition of the functional	Amend the provisions to take into account the functional and operational needs of infrastructure.

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		and operational needs of infrastructure. This issue is particularly acute given the significant areas of Otago that will likely meet the criteria for 'highly valued' or be identified as holding mana whenua values. These areas can cover entire landscapes, or in the case of QLDC (for example) 90% of the district.	
EIT-INF-E2 – Explanation	Oppose in Part	EIT-INF-E2 – Explanation reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to EIT-INF-E2 to give effect to the relief sought.
EIT-INF-PR2 – Principal Reasons	Oppose in Part	EIT-INF-PR2 – Principal reasons reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to EIT-INF-PR2 to give effect to the relief sought.
EIT-INF-AER5 to 8 – Anticipated environmental results	Oppose in part	<p>The nature of infrastructure is such that it requires long-term planning and certainty with respect to resources. Infrastructure is generally very costly and is intended to have an extended life. It would therefore be appropriate for this provision to apply to infrastructure generally. Good infrastructure supports the well-being of communities. Infrastructure will often have functional and operational needs that can dictate where it needs to be located and the extent of methods available to manage effects.</p> <p>EIT-INF-AER5 to 8 – Anticipated environmental results reflects the objectives, policies and methods in this chapter, and so</p>	<p>Amend EIT-INF-AER8 as follows:</p> <p><i>“the adverse effects associated with infrastructure are avoided and minimised to the extent practicable in accordance with the effects management hierarchy”.</i></p> <p>And</p> <p>Consequential amendments to EIT-INF-AER5 to 8 to give effect to the relief sought.</p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		consequential changes may be required to give effect to the relief sought.	
HAZ – HAZARDS AND RISKS			
HAZ-NH-P11 Kaitiaki decision making	Oppose in part	<p>The policy specifically provides for Kāi Tahu to be involved in decision making and management processes relating to their land and interests.</p> <p>OWRUG consider that all owners of freehold land that is susceptible to natural hazards should also have the ability to be involved in decision making and management processes as it relates to their land.</p>	Amend HAZ-NH-P11 to apply to all owners of freehold land that is susceptible to natural hazards.
HAZ-NH-M2 Local authorities	Oppose in part	HAZ-NH-M2 clause (1) requires local authorities to assess the level of natural hazard risk at a district or community scale. HAZ-NH-M3 and M4 set out requirements for resource consent applications where the identification has not occurred. No timeframe is set for local authorities to develop the Risk Table. OWRUG consider that a timeframe should be set to provide certainty for consent applicants in terms of undertaking such an assessment.	Amend clause (1) of HAZ-NH-M2 to require the development of the Risk Table(s) to be undertaken by December 2023.
HAZ-NH-M3 Regional plans	Oppose in part	HAZ-NH-M3 sets out requirements for resource consent applications lodged prior to the natural hazard risk assessment required by HAZ-NH-M2(1) being completed. The natural hazard risk assessment should be	Amend HAZ-NH-M3 clause (7)(a) to add 'commensurate with the level of risk from the proposed activity'

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		commensurate with the level of risk from the proposed activity.	
HAZ-NH- M4 District plans	Oppose in part	HAZ-NH-M4 sets out requirements for resource consents or plan changes lodged prior to the natural hazard risk assessment required by HAZ-NH-M2(1) being completed. The natural hazard risk assessment should be commensurate with the level of risk from the proposed activity.	Amend HAZ-NH-M4 clause (7)(a) to add 'commensurate with the level of risk from the proposed activity'
HAZ-NH-E1 – Explanation	Oppose in Part	HAZ-NH-E1 – Explanation reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to HAZ-NH-E1 to give effect to the relief sought.
HAZ-NH -PR1 – Principal Reasons	Oppose in Part	HAZ-NH-PR1 – Principal reasons reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to HAZ-NH-PR1 to give effect to the relief sought.
HAZ-NH-AER1 to 5 – Anticipated environmental results	Oppose in Part	HAZ-NH-AER1 to 5 – Anticipated environmental results reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to HAZ-NH-AER1 to 5 to give effect to the relief sought.
HCV – HISTORICAL AND CULTURAL VALUES			
HCV-HH-P5	Oppose in part	Generally, infrastructure will have functional and locational requirements that can dictate, or at least place limitations on where it can occur. It may not be possible to avoid adverse effects entirely. OWRUG consider it would be appropriate to manage the effects of	If the amendments sought to EIT-INF-P13 are accepted, then retain clause (6) of HCV-HH-P5. Alternatively, amend clause (6) of Policy HCV-HH-P5 to manage adverse effects on historic heritage for infrastructure that is not nationally

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>infrastructure developments in accordance with the effects mitigation hierarchy.</p> <p>Clause (6) of Policy HCV-HH-P5 directs that Policy EIT-INF-P13 applies to infrastructure. However, Policy EIT-INF-P13 only sets out the management of adverse effects that are significant. For infrastructure that is not nationally or regionally significant, clauses (3) to (5) of Policy HCV-HH-P5 should apply.</p>	or regionally significant in accordance with clauses (3) to (5) of Policy HCV-HH-P5.
HCV-HH-E2 – Explanation	Oppose in Part	HCV-HH-E2 – Explanation reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to HCV-HH-E2 to give effect to the relief sought.
HCV-HH-PR2 – Principal Reasons	Oppose in Part	HCV-HH-PR2 – Principal reasons reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to HCV-HH-PR2 to give effect to the relief sought.
HCV-HH-AER3 to 5 – Anticipated environmental results	Oppose in Part	HCV-HH-AER3 to 5 – Anticipated environmental results reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to HCV-HH-AER3 to 5 to give effect to the relief sought.
NFL – NATURAL FEATURES AND LANDSCAPES			
NFL-P1 – Identification	Oppose in part	OWRUG supports the requirement of territorial authorities, rather than individual consent applicants, to identified 'outstanding and highly valued natural features and landscapes' in the Otago region. However, the policy could be clearer that consent applicants	Amend Policy NFL-P1 as follows: In order to manage outstanding and highly valued natural features and landscapes, identify <u>across Otago</u> :

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		are not required to undertake this mapping for individual applications.	
NFL-P2 – Protection of outstanding natural features and landscapes	Oppose in part	<p>Generally, infrastructure will have functional and locational requirements that can dictate, or at least place limitations on where it can occur. It may not be possible to avoid adverse effects entirely, particularly if the infrastructure is existing and is captured within the mapped 'outstanding and highly valued natural features and landscapes' areas. As such it would be appropriate to manage the effects of infrastructure developments by applying the effects mitigation hierarchy.</p> <p>Policy EIT-INF-P13 provides direction for locating and managing effects of infrastructure on outstanding natural features and landscapes, and so it is considered appropriate to defer to that policy for infrastructure.</p>	<p>Amend Policy NFL-P2 as follows: <u>(3) recognising that for infrastructure, EIT-INF-P13 applies instead of NFL-P2.</u></p>
NFL-P3 – Maintenance of highly valued natural features and landscapes	Oppose in part	<p>Generally, infrastructure will have functional and locational requirements that can dictate, or at least place limitations on where it can occur. It may not be possible to avoid adverse effects entirely, particularly if the infrastructure is existing and is captured within the mapped 'outstanding and highly valued natural features and landscapes' areas. As such it would be appropriate to manage</p>	<p>Amend Policy NFL-P3 as follows: (2) <u>recognising that for infrastructure, EIT-INF-P13 applies instead of NFL-P3.</u></p> <p>Alternatively, OWRUG seek that clause (6) of Policy HCV-HH-P5 is amended to manage adverse effects on historic heritage for infrastructure that is not nationally or regionally significant in accordance with clauses (3) to (5).</p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>the effects of infrastructure developments by applying the effects mitigation hierarchy.</p> <p>Policy EIT-INF-P13 provides direction for locating and managing effects of infrastructure on highly valued natural features and landscapes such as areas of high amenity value, and so it is considered appropriate to defer to that policy for infrastructure.</p>	
NFL-M1 – Identification	Oppose in part	<p>OWRUG supports the requirement of territorial authorities, rather than individual consent applicants, to identify 'outstanding and highly valued natural features and landscapes' in the Otago region. However, it is preferred that the maps are included in the pRPS, rather than in district plans. This is to avoid artificial fragmentation of these areas and inconsistency in managing these resources in regional and district plans, particularly if the areas span jurisdictional and district boundaries.</p>	<p>Introduce maps of the identified 'outstanding and highly valued natural features and landscapes' into the RPS.</p>
NFL -E1 – Explanation	Oppose in Part	<p>NFL-E1 – Explanation reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.</p>	<p>Consequential amendments to NFL-E1 to give effect to the relief sought.</p>
NFL -PR1 – Principal Reasons	Oppose in Part	<p>NFL-PR1 – Principal reasons reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.</p>	<p>Consequential amendments to NFL-PR1 to give effect to the relief sought.</p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
NFL-AER1 to 3 – Anticipated environmental results	Oppose in Part	NFL-AER1 to 3 – Anticipated environmental results reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to NFL-AER1 to 3 to give effect to the relief sought.
UFD – URBAN FORM AND DEVELOPMENT			
UFD-O2- Development of urban areas	Oppose in part	UFD-O2 sets out how development and change in the urban areas will occur. Clause (6) should be clear that minimising conflict with incompatible activities should be both within the urban area and at the boundary with rural land. This is in recognition of the effects that urban expansion may have on the availability of land for food and fibre production.	Amend Clause (6) of UFD-O2 as follows: Minimises conflict between incompatible activities <u>within the urban area and at the urban-rural interface.</u>
UFD-O3 Strategic planning	Oppose in part	UFD-O3 sets out considerations for strategic planning for development of urban areas including regionally significant features and values identified by the pRPS. The pRPS identifies that poorly managed development or expansion of urban areas can result in a loss or degradation of important resources including productive land, and that the productive capacity of highly productive land for primary production should be maintained. Further, the availability of land for primary production (particularly highly productive land) and freshwater resources are needed for food and fibre production, food supply and food security matters. For these reasons, OWRUG consider that highly productive land	Amend Clause (2) of UFD-O3 as follows: <u>'...regionally significant features and values identified by this RPS including highly productive land, and recognises the importance of rural land for productive capacity, rural character, and long-term viability of the food and fibre sector and rural communities.'</u>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
		<p>should be explicitly recognised in the strategic planning for urban development.</p> <p>UFD-O3 applies to expansion of urban areas, which may include the development of rural areas. In this scenario, the objective should highlight the importance of rural land for productive capacity, rural character, and long-term viability of the rural sector and rural communities. Expansion of urban areas can impact on water allocation in water short catchments and cause reverse sensitivity effects, which compromise the productive capacity of rural land for the production of food and fibre.</p>	
UFD-O4 Development in rural areas	Oppose in part	<p>OWRUG seeks that the objective recognises the importance of maintaining the capacity of all productive land for primary production, not only highly productive land.</p> <p>The development of rural areas for urban expansion, rural lifestyle and rural residential development should not be provided for in locations that would significantly impact, including by reverse sensitivity, the productive capacity of the land for the production of food and fibre. Food and fibre sector production, in particular secure food supply, is essential to human health needs.</p>	<p>Amend UFD-O4 as follows:</p> <p>Development in Otago’s rural areas occurs in a way that:</p> <p>...</p> <p>(3) ... or zoned within district plans as suitable for such development, <u>and recognises the importance of rural land for productive capacity, rural character, and long-term viability of the rural sector and rural communities.</u></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
UFD-P1 Strategic planning	Oppose in part	<p>UFD-P1 sets out matters to be considered at the strategic planning level for urban development. OWRUG seeks that location of highly productive land is included in such assessment.</p> <p>For the reasons outlined in the submission point on UFD-O3, OWRUG consider that highly productive land should be explicitly recognised in the strategic planning for urban development.</p>	<p>Amend Clause (8) of UFD-P1 as follows: (8) ...important features and values identified by this RPS <u>including highly productive land.</u></p>
UFD-P4 Urban expansion	Oppose in part	<p>OWRUG supports the framework for urban expansion set out in Policy UFD-P4 that requires the avoidance, as the first priority, highly productive land. Maintaining the capacity of highly productive land for primary production is important.</p> <p>The development of rural areas for urban expansion, rural lifestyle and rural residential development should not be provided for in locations that would significantly impact, including by reverse sensitivity, the productive capacity of the land for the production of food and fibre. Food and fibre sector production, in particular secure food supply, is essential to human health needs.</p>	<p>Amend Clause (7) of UFD-P4 as follows: (7) locates the new urban/rural zone boundary interface by <u>considering</u>: (a) <u>avoiding or minimising</u> adverse effects, particularly reverse sensitivity, on rural areas and existing or potential productive rural activities beyond the new boundary, and ...</p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
UFD-P7 Rural areas	Oppose in part	<p>OWRUG generally supports UFD-P7 which provides for the management of rural areas, with a priority on primary production and rural industry.</p> <p>However, it is unclear what important features or values identified in the pRPS would be provided for. The policy should specify these for clarity. It may be that rural development can occur within such areas and should not be precluded.</p>	<p>Amend Clause (1) of UFD-P7 to specify the important features and values that are provided for.</p> <p>And</p> <p>Amend Clause (2) of UFD-P7 to recognise that productive capacity can occur within such areas and should not be precluded.</p>
UFD-P8 Rural lifestyle and rural residential zones	Oppose in part	<p>The direction of the policy is supported, particularly that highly productive land is avoided and impacts on rural production are minimised. However, OWRUG would prefer that significant adverse effects on rural production potential are avoided as the first priority, and otherwise minimised.</p> <p>The development of rural areas for urban expansion, rural lifestyle and rural residential development should not be provided for in locations that would significantly impact, including by reverse sensitivity, the productive capacity of the land for the production of food and fibre. Food and fibre sector production, in particular secure food supply, is essential to human health needs.</p>	<p>Amend clause (3) of UFD-P8 as follows:</p> <p><u>Avoids, and where avoidance is not possible, minimises impacts on rural production potential, rural character and potential for reverse sensitivity effects on primary production activities in adjoining rural zones.</u></p>

PROVISION	SUPPORT/ OPPOSE	REASON	DECISION SOUGHT
UFD-M2 District plans	Oppose in part	<p>UFD-M2 sets out how development and change in the urban areas will occur. Clause (3)(e) should apply to urban expansion as well as urban development for clarity. Also, it should be clear that the requirement to minimise conflict with incompatible activities is both within the urban area and in the urban-rural interface.</p> <p>Clauses (4) and (5) of UFD-M2 have incorrect policy references.</p>	<p>Amend Clause (3)(e) of UFD-M2 as follows: Minimise the potential for reverse sensitivity effects to arise by managing the location of incompatible activities <u>within the urban area and at the rural-urban interface</u></p> <p>Amend Clause (4) to refer to UPD-P3: Urban intensification.</p> <p>Amend Clause (5) to refer to UPD-P4: Urban expansion.</p>
UFD- E1 – Explanation	Oppose in Part	UFD-E1 – Explanation reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to UFD-E1 to give effect to the relief sought.
UFD-PR1 – Principal reasons	Oppose in Part	UFD-PR1 – Principal reasons reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to UFD-PR1 to give effect to the relief sought.
UFD-AER1 to 11 – Anticipated environmental results	Oppose in Part	UFD-AER1 to 11 – Anticipated environmental results reflects the objectives, policies and methods in this chapter, and so consequential changes may be required to give effect to the relief sought.	Consequential amendments to UFD-AER1 to 11 to give effect to the relief sought.