

**SUBMISSIONS ON
THE PROPOSED FRESHWATER PLANNING INSTRUMENT PART
OF THE PROPOSED OTAGO REGIONAL POLICY STATEMENT 2021**

TO: Otago Regional Council (**Council**)
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1. INTRODUCTION

Ravensdown Limited – Overview and Interests in the Otago Region

- 1.1 Ravensdown Limited (**Ravensdown**) is a farmer owned co-operative. Ravensdown's goal is to enable smarter farming for a better New Zealand. Given this goal, Ravensdown provides products, namely fertiliser and agrochemicals (agrichemicals), expertise and technology to help farmers reduce environmental impacts and to optimise value, or outputs, from land.
- 1.2 Ravensdown, in deciding whether to participate in regional planning processes, considers whether the planning document will achieve the purpose of the Resource Management Act 1991 (**RMA**) while also evaluating whether the planning provisions will unduly constrain its own activities (i.e., manufacturing, store sites and quarries) and/or the users of their products (i.e., its farming shareholders).
- 1.3 In this context, the nature of Ravensdown's interests in the Otago region includes the Dunedin Works in Ravensbourne, Dunedin, which manufactures superphosphate and despatches a range of fertiliser products throughout the South Island and bulk stores located throughout the region (Oamaru, Balclutha and Milton). In addition, through Ravensdown Environmental, Ravensdown assists its shareholders and others to meet regional planning requirements through the provision of farm environment services, which include nutrient loss and mitigation modelling (including OVERSEER Nutrient Budgeting), Farm Environment Plan development, preparation of greenhouse gas loss numbers and mitigation plans, assistance with the intensive winter grazing regulations, nitrogen cap reporting and associated resource consent planning services.
- 1.4 Given the nature of Ravensdown's activities in the Otago region, and the provisions which form part of the 'Proposed Freshwater Planning Instrument Part of the Proposed Otago Regional Policy Statement June 2021' (**PORPS-FW 2021**), Ravensdown seeks to ensure that the PORPS-FW 2021 promotes the sustainable management of the region's freshwater resources. This includes the ability to continue to use and develop the region's freshwater resources while ensuring that adverse effects of activities, including industrial and farming (primary production) activities, are avoided, remedied or mitigated.
- 1.5 Given the above context, the provisions of the PORPS-FW 2021 which are of interest to Ravensdown, given its activities within the region, are as outlined in **paragraph 1.3** above. Therefore, in preparing this submission, Ravensdown has focussed on the proposed provisions that relate to their Dunedin Works site, its bulk stores as well to the provisions which are of relevance to farming activities undertaken by its farming shareholders within the Otago region.

Overview of Submission

- 1.6 As background, Ravensdown submitted on the Proposed Otago Regional Policy Statement 2021 (**PORPS 2021**) when it was notified in June 2021. The submission addressed a number of PORPS 2021 provisions which have now been re-notified, within the PORPS-FW 2021, as freshwater planning instruments.
- 1.7 This submission, similar to Ravensdown's submission (Submitter ID 00121) on the PORPS 2021, generally supports the aspirational purpose of the PORPS-FW 2021 (and PORPS 2021) to

achieve long-term sustainably, by integrating the protection, restoration, enhancement and use of the natural and physical resources of the Otago region. However, Ravensdown has concerns about some of the approaches adopted, particularly where the proposed provisions of the PORPS-FW 2021 deviate from the purpose and principles of the RMA.

- 1.8 Therefore, through these submissions, Ravensdown seeks amendments that enable Ravensdown's Dunedin Works and Otago stores, its shareholders and the users of its products to continue to use and develop resources in the region in a manner that continues to provide for the sustainable management of the region's resources, while also ensuring that adverse effects on the environment are avoided, remedied or mitigated.
- 1.9 In preparing this submission, Ravensdown has also considered the recommendations contained in the section 42A Reports, as well as relevant outcomes of prehearing meetings (where Ravensdown was a participant), that were available prior to the re-notification of the freshwater planning instruments (as now contained in the PORPS-FW 2021). Where Ravensdown supports these recommendations or outcomes then Ravensdown has sought to align its requested amendments with these recommendations and/or outcomes. Ravensdown notes that it would have been helpful if the Otago Regional Council (**Council**) had made amendments to the PORPS-FW 2021 that reflected the section 42A Report recommendations, and the outcomes of the prehearing meetings, prior to re-notifying the freshwater planning instruments that are now the subject to this submission process.
- 1.10 Ravensdown's submissions on PORPS-FW 2021 are structured as follows:
 - (a) Specific submission points on the provisions of the PORPS-FW 2021 are contained in the table provided in **Attachment A**;
 - (b) A conclusion, including the overarching reasons for the submission, is provided in **Section 2**.
- 1.11 Ravensdown also requests any **consequential amendments** arising from the specific submission points contained in **Attachment A**.

2. CONCLUSION

- 2.1 Ravensdown generally supports the PORPS-FW 2021, subject to the amendments requested to address the concerns raised within its submission. In relation to the provisions that Ravensdown has raised concerns about, those provisions require amendment because, without amendment, those provisions:
 - (a) will not promote sustainable management of resources and will not achieve the purpose of the RMA;
 - (b) is contrary to Part 2 and other provisions of the RMA;
 - (c) will not enable the social and economic well-being of the community within the Otago region;
 - (d) will not meet the reasonably foreseeable needs of future generations;

- (e) will not achieve integrated management of the effects of the use, development or protection of the region's freshwater resources;
 - (f) will not enable the efficient use and development of Ravensdown's assets and operations, and of those resources which are dependent on, or benefit from, Ravensdown's assets and operations; and
 - (g) do not represent the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.
- 2.2 Ravensdown could not gain an advantage in trade competition through this submission.
- 2.3 Ravensdown wishes **to be heard** in support of its submissions.
- 2.4 If others are making a similar submission, Ravensdown will consider presenting a joint case with them at the hearing.

Date: 29 November 2022



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Carmen Taylor

Consultant Planner (Partner)

Authorised to sign this submission on behalf of Ravensdown Limited

ATTACHMENT A – RAVENSDOWN LIMITED’S SUBMISSIONS ON THE PROPOSED FRESHWATER PLANNING INSTRUMENT PART OF THE PROPOSED OTAGO REGIONAL POLICY STATEMENT 2021

Where amendments to the provisions of the Proposed Freshwater Planning Instrument Part of the Proposed Otago Regional Policy Statement 2021 are being sought by Ravensdown Limited in its relief sought, the amendments are shown in tracked changes and are also shaded (i.e., underline text for additions and ~~strikethrough text~~ for deletions).

| SUB. REF. | PORPS-FW 2021 PROVISION | PAGE | SUPPORT / OPPOSE | COMMENTS | RELIEF SOUGHT |
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| PART 3 – DOMAINS AND TOPICS | | | | | |
| <i>Domains / LF – Land and freshwater / LF-WAI – Te Mana o te Wai</i> | | | | | |
| 1 | Policy LF-WAI-P1 – Prioritisation | 121 | Support in part | <p>This policy generally reflects the fundamental concept of Te Mana o te Wai, and the associated objective, as contained in the National Policy Statement for Freshwater Management 2020 (NPS-FM 2020). For this reason, Ravensdown generally supports this policy.</p> <p>However, Ravensdown proposes that the policy is amended to reflect the recommendations of the section 42A Report and the outcomes of the prehearing meeting that were available prior to the re-notification of this policy as part of the PORPS-FW 2021. The amendments include:</p> <ul style="list-style-type: none"> - Clarifying, within the chapeau of the policy, that the policy applies to all decision making that affects Otago’s freshwater. This amendment aligns with the NPS-FM 2022 objective. - Amendments to the terminology used in Clauses (1) and (2) of the policy to address issues raised by Kai Tahu in its original submission on this policy through the PORPS 2021. | <p>Amend Policy LF-WAI-P1 as follows:</p> <p><i>In all management of decision-making affecting fresh water in Otago, prioritise:</i></p> <p><i>(1) first, the health and well-being of water bodies, and freshwater ecosystems, te hauora o te wai, and <u>the connections te hauora o te taiao</u>, and the exercise of mana whenua to uphold these,</i></p> <p><i>(2) second, the health and well-being needs of people, (te hauora o te tangata takata); interacting with water through ingestion (such as drinking water and consuming harvested resources harvested <u>from the water body</u>) and immersive activities (such as harvesting resources and bathing <u>primary contact</u>), and</i></p> <p><i>(3) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.</i></p> |

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| Domains / LF – Land and freshwater / LF-VM – Visions and management | | | | | |
| 2 | Objective LF–VM–O2 – Clutha Mata-au FMU vision | 124 and 125 | Support in part | <p>This objective outlines the concepts that are to underpin resource management activities in the Clutha Mata-au Freshwater Management Unit (FMU). These include, but are not limited to, ensuring that:</p> <ul style="list-style-type: none"> - in the Dunstan, Manuhierikia and Roxburgh rohe, that innovative and sustainable land and water management practices support food production and that discharges of nutrients and other contaminants to water are reduced so that water is safe for human contact (Clause (7)(b)(ii)); and, - in the Lower Clutha rohe, that land management practices reduce discharges of nutrients and other contaminants to water so that water is safe for human contact (Clause (7)(c)(iii)). <p>Ravensdown acknowledges that these FMU specific concepts, contained as visions in the PORPS-FW 2021, are likely to be developed further in the new ‘Land and Water Regional Plan’ in accordance with the NPS-FM 2020 National Objectives Framework (NOF). For this reason, Ravensdown is concerned that these concepts may not reflect the environmental outcomes ultimately decided upon by the community. Ravensdown is therefore willing to generally support this objective, while noting that the NOF process may identify a different set of environmental outcomes.</p> <p>Ravensdown also acknowledges, as outlined in Clauses (7)(b)(ii) and 7(c)(iii) of the objective, that, in accordance with the principles of ‘good management practices’ (GMP) which is being adopted by New Zealand’s farming activities, there is a need to implement practices that</p> | <p>Amend Objective LF-VM-O2 as follows:</p> <p><i>In the Clutha Mata-au FMU:</i></p> <p>...</p> <p>(5C) food production in the area is supported by innovative and sustainable land and water management practices that reduce discharges of nutrients and other contaminants to water bodies where required to ensure that they are safe for human contact,</p> <p>(7) in addition to (1) to (6) above:</p> <p>(b) in the Dunstan, Manuhereikia and Roxburgh rohe:</p> <p>...</p> <p>(ii) innovative and sustainable land and water management practices support food production in the area and reduce discharges of nutrients and other contaminants to water bodies so that they are safe for human contact, and</p> <p>....</p> <p>(c) in the Lower Clutha rohe:</p> <p>...,</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>...</p> |

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| | | | | <p>reduce nutrient discharges, and the discharge of other contaminants. For this reason, except for ensuring consistency of language used, Clauses (7)(b)(ii) and (7)(c)(iii) of this policy is specifically supported. In terms of the consistency of language use, Clauses (7)(c)(iii) should also refer to innovative and sustainable land and water management practices that support food production.</p> <p>While Ravensdown requests amendments to ensure language consistency within the notified versions of Clauses (7)(b)(ii) and 7(c)(iii) of the objective, Ravensdown also considers that Clauses (7)(b)(ii) and 7(c)(iii) should be amended to reflect recommendations of the section 42A Report that was available prior to the re-notification of this policy as part of the PORPS-FW 2021. The recommended amendment entails moving these clauses to a new Clause 5C that applies to all four rohe and restructuring the clause (without changing the intent of the clause).</p> | |
| 3 | Objective LF–VM–O3 – North Otago FMU vision | 125 | Support in part | <p>Similar to Objective LF-VM-O2 above (Sub. Ref. 2), this objective outlines the concepts that are to underpin resource management activities in the North Otago FMU. These include, but are not limited to, ensuring that:</p> <ul style="list-style-type: none"> - that land management practices reduce discharges of nutrients and other contaminants to water so that water is safe for human contact (Clause (5)); and - that innovative and sustainable land and water management practices support food production and improve resilience to the effects of climate change (Clause (6)). | <p>Amend Objective LF-VM-O3 as follows:</p> <p><i>By 2050 in the North Otago FMU:</i></p> <p>...</p> <p>(5) land management practices reduce discharges of nutrients and other contaminants to water bodies <u>are reduced so where required to ensure that they water bodies are safe for human contact and mahika kai species are safe for consumption,</u> and</p> <p>(6) <u>food production in the area is supported by innovative and sustainable land and water</u></p> |

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| | | | | <p>As outlined in relation to Objective LF-VM-O2, Ravensdown is willing to generally support this objective, while noting that the NOF process for the new 'Land and Water Regional Plan' may identify a different set of environmental outcomes.</p> <p>Ravensdown also supports the recognition that innovative and sustainable land and water management practices support food production, as well as the need for farming activities to reduce discharges of nutrients and other contaminants.</p> <p>However, Ravensdown proposes that Clauses (5) and (6) of the objective are amended to reflect the recommendations of the section 42A Report that was available prior to the re-notification of this policy as part of the PORPS-FW 2021. These amendments entail a restructuring of the clause which does not change its intent, and an addition to the clause which also requires that the dryland nature of the FMU is recognised.</p> | <p><i>management practices support food production in the area and that improve resilience to the effects of climate change and recognise the dryland nature of much of this FMU.</i></p> |
| 4 | Objective LF-VM-O4 – Taiari FMU vision | 125 and 126 | Support in part | <p>Similar to Objective LF-VM-O2 above (Sub. Ref. 2), this objective outlines the concepts that are to underpin resource management activities in the Taiari (Taiari) FMU. These includes, but is not limited to, ensuring that innovative and sustainable land and water management practices support food production and improve resilience to the effects of climate change (Clause (8)).</p> <p>As outlined in relation to Objective LF-VM-O2, Ravensdown is willing to generally support this objective, while noting that the NOF process for the new 'Land and Water Regional Plan' may identify a different set of environmental outcomes.</p> <p>Ravensdown also supports the recognition that</p> | <p>Amend Objective LF-VM-O4 as follows:</p> <p><i>By 2050 in the Taiari-Taiari FMU:</i></p> <p>...</p> <p>(8) <i>food production in the area is supported by innovative and sustainable land and water management practices support food production in the area and that improve resilience to the effects of climate change, including flooding.</i></p> |

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| | | | | <p>innovative and sustainable land and water management practices support food production.</p> <p>However, Ravensdown proposes that Clause (8) of the objective is amended to reflect the recommendations of the section 42A Report that was available prior to the re-notification of this policy as part of the PORPS-FW 2021. These amendments entail a restructuring of the clause which does not change its intent, and an addition to the clause which acknowledges the flooding issues that are present in the FMU.</p> | |
| 5 | Objective LF–VM–05 – Dunedin & Coast FMU vision | 126 | Support in part | <p>Similar to Objective LF-VM-O2 above (Sub. Ref. 2), this objective outlines the concepts that are to underpin resource management activities in the Dunedin & Coast FMU.</p> <p>As outlined in relation to Objective LF-VM-O2, Ravensdown is willing to generally support this objective, while noting that the NOF process for the new ‘Land and Water Regional Plan’ may identify a different set of environmental outcomes.</p> <p>However, this objective, when compared to the other FMU objectives discussed above, does not recognise innovative and sustainable land and water management practices that support food production. While the Dunedin & Coast FMU is characterised by a number of urban areas, there are also large tracts of rural land that are used for food production and this should also be recognised within the objective. Ravensdown therefore requests the inclusion of a new Clause (6) that recognises the significance for food production activities within the FMU. The phrasing used in other FMU objectives, as recommended in the section 42A Report that was available prior to the re-notification of the</p> | <p>Amend Objective LF-VM-05 as follows:</p> <p><i>By 2040 in the Dunedin & Coast FMU:</i></p> <p>...</p> <p><u>(6) food production in the area is supported by innovative and sustainable land and water management practices that improve resilience to the effects of climate change.</u></p> |

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| | | | | <p>PORPS-FW 2021, has been proposed.</p> <p>Ravensdown understands that the lack of recognition of the food production within the FMU in this objective is due to the fact that it was not an outcome, or vision, identified during community consultation meeting/s. In response to this statement, Ravensdown notes that this submission process is a continuation of the earlier consultation process and that the outcomes of the earlier community consultation should not mean that the objective is now 'locked in stone'. Also, it is likely, given that the FMU is characterised by large urban areas, that the community consultation process was dominated by urban dwelling people and parties (thus the outcomes reflect their biases).</p> | |
| 6 | Objective LF–VM–O6 – Catlins FMU vision | 126 | Support in part | <p>Similar to Objective LF-VM-O2 above (Sub. Ref. 2), this objective outlines the concepts that are to underpin resource management activities in the Catlins FMU. These include, but are not limited to, ensuring that water supports opportunities for sustainable food production for future generations (Clause (6)).</p> <p>As outlined in relation to Objective LF-VM-O2, Ravensdown is willing to generally support this objective, while noting that the NOF process for the new 'Land and Water Regional Plan' may identify a different set of environmental outcomes.</p> <p>However, this objective, when compared to the other FMU objectives discussed above, does not recognise innovative and sustainable land and water management practices that support food production. Ravensdown therefore requests the inclusion of a new Clause (7) that recognises the significance for food production activities. The phrasing used in other FMU objectives, as</p> | <p>Amend Objective LF-VM-O6 as follows:</p> <p><i>By 2030 in the Catlins FMU:</i></p> <p>...</p> <p><i>(6) healthy, clear and clean water supports opportunities for recreation and sustainable <u>agriculture, including food production, for future generations, and</u></i></p> <p><i><u>(7) food production in the area is supported by innovative and sustainable land and water management practices that improve resilience to the effects of climate change.</u></i></p> |

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| | | | | recommended in the section 42A Report that was available prior to the re-notification of the PORPS-FW 2021 for the other FMU objectives, has been proposed. In addition, Ravensdown also requests a minor amendment to Clause (6) as recommended in the section 42A Report that was available prior to the re-notification of the PORPS-FW 2021. | |
| Domains / LF – Land and freshwater / LF-FW – Fresh water | | | | | |
| 7 | Policy LF-FW-P7 – Fresh water | 129 and 130 | Support in part | <p>This policy, as proposed, identifies that environmental outcomes, attribute states and limits are to be established to ensure that the matters outlined in Clauses (1) to (6) of the policy are provided for. The matters identified, and the environmental outcome process articulated in this policy, reflect the NOF process required to undertaken in accordance with the NPS-FM 2020.</p> <p>With two exceptions, as the policy reflects the NPS-FM 2020 NOF process that is to be carried out in the Otago region, Ravensdown supports the policy.</p> <p>However, the first exception relates to the river and lake primary contact outcomes contained in Clause (3) of the policy. The percentage targets proposed are higher than those contained in Appendix 3 of the NPS-FM 2020. It is understood that these percentage targets were development in 2018 in response to the requirements of the National Policy Statement for Freshwater Management 2014 (as amended in 2017). While these targets may have been developed in accordance with the requirements at the time, and while they may be appropriate across the region and/or for specific FMUs in the future, for the PORPS 2021 to</p> | <p>Amend Policy LF-FW-P7 as follows:</p> <p><i>Environmental outcomes, attribute states (including target attribute states), <u>environmental flows and levels</u>, and limits ensure that:</i></p> <p>...</p> <p>(3) <i>specified rivers and lakes are suitable for primary contact within the following timeframes:</i></p> <p>(a) by 2030, 980% of rivers and 98% of lakes, and</p> <p>(b) by 2040, 990% of rivers and 100% of lakes, and</p> <p>...</p> |

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| | | | | <p>specify these percentages in the absence of community involvement through the NOF process is not appropriate. For this reason, Ravensdown has requested changes to Clause (3) of this policy that are consistent with Appendix 3 of the NPS-FM 2020.</p> <p>The second exception solely relates to the proposed amendment to the chapeau of the policy. The amendment requested is the same as that recommended in the section 42A Report that was available prior to the re-notification of the PORPS-FW 2021. The recommended amendment ensures that 'environmental flows and levels', which are also matters to be set to achieve environmental outcomes under the NOF process, are appropriately identified within the policy.</p> | |
| 8 | Policy LF-FW-P15 – Stormwater and wastewater discharges | 132 and 133 | Support in part | <p>This policy, as proposed, aims to minimise the adverse effects of stormwater and wastewater discharges (direct and indirect) on freshwater, through implementing the criteria and approaches outlined in Clauses (1) to (3) of the policy.</p> <p>When the PORPS 2021 was notified, Ravensdown, in its original submission, except for one matter of clarification (in relation to Clause (2)(e)), stated that it generally supported the criteria and approaches outlined in this policy as they reflect appropriate 'design' approaches for such systems.</p> <p>The matter of clarification related to the notified Clause (2)(e) of the policy which seems to infer that stormwater and wastewater discharges must meet applicable water quality standards at the point of discharge. The RMA provides for discharges to meet relevant standards or limits after reasonable mixing, not</p> | <p>Amend Policy LF-FW-P15 as follows:</p> <p>Policy LF-FW-P15 – Stormwater and wastewater discharges. Minimise the adverse effects of direct and indirect discharges of stormwater and wastewater to fresh water by:</p> <p>(1) except as required by LF-VM-O2 and LF-VM-O4, preferring discharges of wastewater to land over discharges to water, unless adverse effects associated with a discharge to land are greater than a discharge to water, and</p> <p>(2) requiring:</p> <p>(a) all sewage, industrial or trade waste to be discharged into a reticulated wastewater system, where one is available,</p> <p>(b) all stormwater to be discharged into a reticulated system, where one is <u>made</u></p> |

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| | | | | <p>within the discharge itself. Ravensdown original submission therefore requested an amendment to Clause (2)(e) of this policy to clarify that this is the requirement.</p> <p>Since preparing its original submission on the PORPS 2021, and prior to the re-notification of the PORPS-FW 2022, amendments to this policy were proposed through recommendations of the section 42A Report, with subsequent amendments arising from the outcomes of the prehearing meetings. The main changes recommended was to split the policy, with Policy LF-FW-15 solely applying to stormwater discharges and a new policy (Policy LF-FW-15A) applying to containing animal effluent, sewage and other human wastes, and industrial and trade waste. These proposed amended and new policies are supported by Ravensdown as the criteria and approaches outlined in these policies reflect appropriate 'design' and management approaches for the various discharges to which the policies apply. In addition, the 'matter of clarification' that Ravensdown raised in its original submission in relation to Clause 2(e) has not been appropriately addressed in the amended Policy LF-FW-P15 or the new Policy LF-FW-P15A.</p> <p>For the above reasons, Ravensdown requests that the policy is amended to reflect the recommendations arising from the section 42A Report and subsequent prehearing outcomes.</p> | <p><i>available by the operator of the reticulated system, unless alternative treatment and disposal methods will result in improved environmental outcomes.</i></p> <p><i>(c) implementation of methods to progressively reduce the frequency and volume of wet weather overflows and minimise the likelihood of dry weather overflows occurring for into reticulated stormwater and wastewater systems,</i></p> <p><i>(d) on-site wastewater systems to be designed and operated in accordance with best practice standards,</i></p> <p><i>(e) that any stormwater and wastewater discharges do not prevent water bodies from to meeting any applicable water quality standards set for FMUs and/or rohe, and</i></p> <p><i>(f) the use of water sensitive urban design techniques to avoid or mitigate the potential adverse effects of contaminants on receiving water bodies from the subdivision, use or development of land, wherever practicable, and</i></p> <p><i>(3) promoting the reticulation of stormwater and wastewater in urban areas, and</i></p> <p><i>(4) promoting source control as a method for reducing contaminants in discharges of stormwater.</i></p> <p><u>Policy LF-FW-P15A – Discharges containing</u></p> |

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| | | | | | <p><u>animal effluent, sewage and other human wastes, and industrial and trade waste. Avoid the adverse effects of direct and indirect discharges containing animal effluent, sewage and other human wastes (including cremated ashes), and industrial and trade waste to fresh water by:</u></p> <p><u>(1) requiring new discharges containing sewage or other human wastes, or industrial and trade waste to be to land, unless adverse effects associated with a discharge to land are demonstrably greater than a discharge to fresh water,</u></p> <p><u>(1A) requiring discharges containing animal effluent to be to land,</u></p> <p><u>(2) requiring:</u></p> <p><u>(a) that all discharges containing sewage, other human wastes or industrial and trade waste are discharged into a reticulated wastewater system, where one is made available by its owner, unless alternative treatment and disposal methods will result in improved environmental outcomes,</u></p> <p><u>(b) implementation of methods to progressively reduce the frequency and volume of wet weather overflows and minimise the likelihood of dry weather overflows occurring into reticulated wastewater systems,</u></p> <p><u>(c) on-site wastewater systems and animal</u></p> |

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| | | | | | <p><u>effluent systems to be designed and operated in accordance with best practice standards,</u></p> <p><u>(d) that any discharges do not prevent water bodies from meeting any applicable water quality standards set for FMUs and/or rohe,</u></p> <p><u>(3) promoting the reticulation of wastewater in urban areas, and</u></p> <p><u>(4) promoting source control as a method for reducing contaminants in discharges containing sewage, other human wastes or industrial and trade waste.</u></p> |
| 9 | Method LF-FW-M7 – District plans | 134 | Support | <p>This method outlines the matters that are to be included in new or amended district plans in relation to activities that may affect identified outstanding water bodies, as well as various provisions to require the adoption of water sensitive design techniques and to reduce the adverse effects of stormwater discharges.</p> <p>Ravensdown supports this method in relation to the stormwater management matters to be included in new or amended district plans as outlined in Clause (4) of the method. Ravensdown considers that the potential mechanisms listed in Clause (4) represent some of the best practice approaches to stormwater management.</p> <p>However, Ravensdown proposes that Clause (4) of the method is amended to reflect the recommendations of the section 42A Report and the prehearing meeting outcomes that were available prior to the re-notification of this policy as part of the PORPS-FW 2021. The relevant amendment now entails requiring peak</p> | <p>Amend Method LF-FW-M7 as follows:</p> <p><i>Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to:</i></p> <p>...</p> <p><i>(4) reduce the adverse effects of stormwater discharges by managing the subdivision, use and development of land to:</i></p> <p><i>(a) minimise the peak volume of stormwater needing off-site disposal and the load of contaminants carried by it,</i></p> <p><i>(b) minimise adverse effects on fresh water and coastal water as the ultimate receiving environments, and the capacity of the stormwater network,</i></p> <p><i>(c) encourage on-site storage of rainfall to detain peak stormwater flows <u>where</u></i></p> |

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| | | | | stormwater flows to be detained through on-site storage where it is appropriate to do so. | <u>appropriate</u> , and (d) promote the use of permeable surfaces. |
| Domains / LF – Land and freshwater / LF-LS – Land and soil | | | | | |
| 10 | Policy LF-LS-P18 – Soil erosion | 137 | Support | <p>This policy aims to minimise soil erosion, and associated water body sedimentation, that could result from land use activities, by implementing the approaches contained in Clauses (1) to (3) of this policy.</p> <p>Ravensdown agrees that minimising soil erosion, and any associated sedimentation, from land use activities, is important. In addition, the approaches identified in Clauses (1) to (3) of the policy generally reflect the nature of controls that can be put in place to avoid or minimise the potential for soil erosion. For these reasons, this policy is supported.</p> <p>However, Ravensdown proposes that the policy is amended to reflect the recommendations of the section 42A Report that were available prior to the re-notification of this policy as part of the PORPS-FW 2021. The amendments proposed include: requiring appropriate (as well as effective) management practices to be implemented to retain topsoil in-situ (Clause (1)); and, adding 'to the extent practicable' into Clause (2).</p> | <p>Amend Policy LF-LS-P18 as follows:</p> <p><i>Minimise soil erosion, and the associated risk of sedimentation in water bodies, resulting from land use activities by:</i></p> <p>(1) implementing <u>appropriate and</u> effective management practices to retain topsoil in-situ and minimise the potential for soil to be discharged to water bodies, including by controlling the timing, duration, scale and location of soil exposure,</p> <p>(2) maintaining vegetative cover on erosion-prone land, <u>to the extent practicable</u>, and</p> <p>(3) promoting activities that enhance soil retention</p> |
| 11 | Policy LF-LS-P21 – Land use and fresh water | 138 | Support in part | <p>This policy aims to improve or maintain water quality or quantity, so that the FMU environmental outcomes are met, by: reducing direct and indirect discharges of contaminants to water from land use activities (Clause (1)); and, managing land uses that adversely affect water flows (Clause (2)).</p> <p>Maintaining or improving water quality and quantity, where degraded or over-allocated, is consistent with the requirements of the NPS-FM 2020, both pre and post</p> | <p>Amend Policy LF-LS-P21 as follows:</p> <p>Achieve the improvement or maintenance of fresh water quantity, or quality. The health and well-being of water bodies is maintained or, if degraded, improved to meet environmental outcomes set for Freshwater Management Units and/or rohe by:</p> <p>(1) reducing <u>or otherwise managing the adverse effects of</u> direct and indirect discharges of</p> |

| SUB. REF. | PORPS-FW 2021 PROVISION | PAGE | SUPPORT / OPPOSE | COMMENTS | RELIEF SOUGHT |
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| | | | | <p>the NOF process. Approaches to achieving this includes managing land use activities as generally outlined in Clauses (1) and (2) of this policy. For these reasons, Ravensdown generally supports this policy.</p> <p>When the PORPS 2021 was originally notified, Ravensdown, in its original submission supported this policy while requesting amendments to address two issues. The first issue outlined was that if water quality is not degraded (i.e., the environment outcomes are met), then the policy driver is to maintain water quality and therefore the reduction of contaminants in discharges, as sought in Clause (1) of the policy, may not be necessary. Secondly, the phrasing at the beginning of the policy was considered unusual, and therefore amendments to address this matter were proposed by Ravensdown in its original submission.</p> <p>Since preparing its original submission on the PORPS 2021, and prior to the re-notification of the PORPS-FW 2022, amendments to this policy were proposed through recommendations of the section 42A Report. The recommended amendments addressed the issues raised by Ravensdown in its original submission, and therefore Ravensdown, through this submission, seeks the section 42A Report's recommended amendments to this policy, including the proposed additional Clause (3). Ravensdown considers that maintaining or enhancing habitat in riparian margins has the potential to assist with improving or maintaining the health and well-being of water bodies.</p> | <p><i>contaminants to water from the use and development of land <u>to meet environmental outcomes, and</u></i></p> <p><i>(2) managing land uses that may have adverse effects on the flow of water in surface water bodies or the recharge of groundwater, <u>and</u></i></p> <p><i><u>(3) maintaining or, where degraded, enhancing the habitat and biodiversity values of riparian margins in order to reduce sedimentation of water bodies and support improved functioning of catchment processes.</u></i></p> |
| 12 | Method LF-LS-M11 – Regional plans | 138 and 139 | Support | This method, which outlines the matters that must be included in regional plans in relation to the region's land and soil resources, reflects the intent of all of the | Retain Method LF-LS-M11 as notified. |

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| | | | | <p>objectives and policies contained in this chapter of the PORPS 2021 (i.e., not just the freshwater planning instruments). In addition, Clause (1)(a) identifies that the development and implementation of Freshwater Farm Plans, where these are required by the RMA and any regulations. This provision relates to Part 9A of the RMA, and subsequent regulation that may apply in the Otago region.</p> <p>As Ravensdown has generally supported the land and soil objectives and policies of the PORPS 2021 (except for the amendments to Policy LF-LS-P18 and LF-LS-P21 requested within this PORPS-FW 2021 submission – refer above to Sub. Refs. 10 and 11), Ravensdown also supports this method.</p> | |