

Waka Kotahi NZ Transport Agency further submission on notified proposal for the Proposed Otago Regional Policy Statement 2021 (Freshwater Planning Instrument Parts) under Clause 8 of Schedule 1 of the Resource Management Act 1991

3rd February 2023

Otago Regional Council
Private Bag 1954
Dunedin

via email: fpisubmission@orc.govt.nz

This is a further submission on a change proposed to the following plan:

Proposed Otago Regional Policy Statement 2021 (Freshwater Planning Instrument Parts).

Submitter ID number: FPI018

The Waka Kotahi further submission is:

1. Waka Kotahi NZ Transport Agency (Waka Kotahi) is a Crown entity that takes an integrated approach to transport planning, investment and delivery. The statutory objectives of Waka Kotahi are to undertake its functions in a way that contributes to an effective, efficient and safe land transport system in the public interest. Our vision is for a sustainable, multi-modal land transport system where public transport, active or shared modes are the first choice for most daily transport needs.
2. Waka Kotahi has a mandate under the Land Transport Management Act 2003 (LTMA), the Government Rounding Powers Act 1989 (GRPA), and the Government Policy Statement on Land Transport 2021/22-2030/31 (GPS) to carry out its functions in a way that delivers on the transport outcomes set by the government.
3. In the 2021-2024 National Land Transport Programme, Waka Kotahi has allocated significant investment in the Otago Region to the improvement, operation and maintenance of the State Highway network, including public transport investment, walking and cycling and transport planning. In addition, Waka Kotahi co-funds the local roading network. Waka Kotahi is therefore a significant investor in the infrastructure required to ensure people and communities of the Otago Region are provided with their social, economic and cultural well-being, as well as their health and safety.
4. Overall, Waka Kotahi has an interest in the Proposed Otago Regional Policy Statement 2021 (Freshwater Planning Instrument Parts) as a result of its role as a:
 - Transport investor – to maximise effective, efficient and strategic returns for New Zealand;

- Planner of land transport networks – to ensure the effective integration of infrastructure and land use to support liveable communities and the development of an effective and resilient land transport network for customers;
 - Provide for access to and the use of the land transport system – to shape smart, efficient, safe and responsible transport choices; and
 - Manager of the state highway network – to deliver efficient, safe and responsible highway solutions for customers.
5. For these reasons it is considered that Waka Kotahi has an interest which is greater than the general public.
 6. Further points are summarised in Table 1, which forms the bulk of our submission. In general Waka Kotahi has not made a further submission on provisions already covered by its primary submission due to the volume of submissions received.
 7. Waka Kotahi could not gain an advantage in trade competition through this submission.

We seek the following decision from the local authority:

Amend the provisions of the Proposed Otago Regional Policy Statement 2021 (Freshwater Planning Instrument Parts) as detailed in Table 1 (attached) including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this further submission.

Waka Kotahi would like to be heard in support of its submission. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at a hearing.

Signature of person authorised to sign on behalf of Submitter:



Helen Dempster

Senior Planner – Poutiaki Taiao/Environmental Planning

Waka Kotahi NZ Transport Agency

Address for service:

Contact person: Helen Dempster - Senior Planner - Poutiaki Taiao/Environmental Planning

Email: helen.dempster@nzta.govt.nz

Telephone: DD +64 3 742 1792 / M 021 428 704

Postal Address: Waka Kotahi NZ Transport Agency, PO Box 5245, Dunedin 9058, New Zealand

Table 1: Decisions Sought on the Proposed Otago Regional Policy Statement 2021 (Freshwater Planning Instrument Parts)

This further submission is in relation to the submission of:	The particular submission point I/we support or oppose is:	My/our position on this submission point is:	The reasons for my/our support or opposition are:	I/we seek that the whole (or part) of the submission be allowed (or disallowed):
LF-FW – Fresh water				
Otago Fish & Game Council and the Central South Island Fish & Game Council	LF-FW-O8 (submission point FPI037.015)	Oppose	Proposed clause 4(a) seeks protection and restoration of trout and salmon habitat. Waka Kotahi considers that this request would make the policy too onerous.	Reject submission
Otago Fish & Game Council and the Central South Island Fish & Game Council	LF-FW-P7 (submission point FPI037.019)	Oppose	Proposed clause 2(a) seeks protection and restoration of trout and salmon habitat. Waka Kotahi considers that this request would make the policy too onerous.	Reject submission
LF-LS - Soils				
Wise Response Society	LF-LS-M12 (submission point FPI035.025)	Oppose	<p>Waka Kotahi notes that LF-LS-M12 is not part of the Freshwater Planning Instrument Parts of the PORPS; rather, this provision is part of PORPS Non-freshwater parts to which Waka Kotahi has provided primary evidence on.</p> <p>However, Waka Kotahi would still like to note that prohibiting the removal of montane tall tussock grasslands is considered too restrictive, particularly given these grasslands are extensive in the Otago region and the purpose to retain them is due to their important role in maintaining water yield.</p>	Reject submission