

**BEFORE THE INDEPENDENT COMMISSIONERS**

**IN THE MATTER**      the Resource Management Act 1991

**AND**

**IN THE MATTER**      Proposed Otago Regional Policy Statement  
2021, Chapter 6: Integrated Management  
and Chapter 11: Energy, Infrastructure and  
Transport

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**SUBMISSIONS ON BEHALF OF THE ENVIRONMENTAL DEFENCE SOCIETY INCORPORATED**

**15 MARCH 2023**

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## Introduction

- 1 The Environmental Defence Society's (EDS) interest in the Proposed Otago Regional Policy Statement 2021 (pORPS) is to ensure that the instrument adopts a precautionary approach to new activities that will be significant greenhouse gas emitters and encourages new activities that reduce greenhouse gas emissions.
- 2 EDS is a national public interest environmental organisation established in 1971. EDS seeks to achieve good environmental outcomes through improving the quality of New Zealand's legal and policy frameworks and participating in statutory decision-making processes. EDS has been active in assessing the effectiveness of the Resource Management Act 1991 and statutory planning documents in addressing key environmental issues.

## EDS's further submission

- 3 EDS made two further submissions on the issue of climate change activities:
  - In opposition to Christchurch International Airport Limited's (CIAL) submission which seeks amendments to the pORPS to provide for airports, aerodromes and ancillary infrastructure within the definition of regionally significant infrastructure and provide greater recognition of this through subsequent provisions; and
  - Broadly in support of the Royal Forest and Bird Society of New Zealand's submission which, *inter alia*, seek changes to the pORPS to require the Council to develop climate change responses for the region which provide for initiatives that reduce greenhouse gas emissions.
- 4 This submission addresses each of these points below.

## Mr Renwick's evidence

- 5 EDS's further submission is supported by a statement of evidence by James Renwick, dated 18 November 2021. Mr Renwick is Aotearoa New Zealand's preeminent climate change scientist. His evidence, which represents the consensus understanding of the global scientific community on the causes of climate change, and what is required to mitigate it, concludes:
  - To limit warming to 1.5°C emissions of carbon dioxide must be reduced to zero by 2050.
  - The 2020s must be the decade of action, to get us on the path to zero emissions.
  - The aviation sector must play a role in the transformations needed to meet emissions reductions targets.
  - There are two approaches to reducing aviation emissions:
    - i. Developing low-emissions fuel alternatives, e.g. biofuels and hydrogen fuel cells; and
    - ii. Reducing energy demand by reducing demand for flying.

- While alternative fuels are being developed, and may eventually be feasible for short-haul domestic aviation, there is a growing need for systemic infrastructure changes that enable behavioural modifications and reductions in demand for transport services that can in turn reduce energy demand.
- The greatest potential to avoid emissions comes from reducing long-haul aviation and providing short-distance low-carbon urban infrastructures.
- The Otago Regional Council needs to shape its ideas accordingly and look for ways to lock in emissions reductions, rather than perpetuating existing high-emissions activities.

### Definition of Regionally significant infrastructure

- 6 CIAL seeks to amend the definition of Regionally Significant Infrastructure to include airports and aerodomes. Several airports are already captured by the definition, including by virtue of its proposed cross reference to Nationally Significant Infrastructure, but the definition does not include new airports such as that posited at Tarras.
- 7 CIAL’s evidence notes that this constraint on future airports is not future focussed, and provides an inappropriate barrier to a broader, merit-based assessment of a future airport’s benefits against the need to avoid, remedy or mitigate adverse effects.<sup>1</sup>
- 8 The section 42A report on CIAL’s submission states:<sup>2</sup>

*“I do not agree with the CIAL submission. I consider the amendment broadens the scope of coverage for airports to all aviation infrastructure through the inclusion of reference to unspecified “aerodromes”. While I understand the submitters interest in a potential new airport at Tarras, I note that this is not yet consented and does not exist. In addition, I note that the definition of nationally significant infrastructure includes “any airport (but not its ancillary commercial activities) used for regular air transport services by aeroplanes capable of carrying more than 30 passengers”. I consider that the recommended cross reference to the definition of nationally significant infrastructure will resolve the submitter’s concern. I recommend rejecting this submission.”*

- 9 EDS agrees with the section 42A report and considers that new airports should not be captured by the definition of Regionally Significant Infrastructure. As set out by Mr Renwick, limiting warming to 1.5°C cannot be achieved solely by switching to alternative fuel sources. Rather, a reduction in demand for aviation transportation is also critical. The pORPS should include provisions which drive this outcome, including through use of “avoid” policies with respect to infrastructure not defined as regionally significant.

### Provide for initiatives that reduce greenhouse gas emissions

- 10 Forest and Bird sought an amendment to IM-M4 to help achieve climate change objectives by requiring clearer direction in regional and district plans to reduce emissions.

<sup>1</sup> CIAL’s evidence of Matthew Bonis, paras 12 – 20.

<sup>2</sup> S42A Report, Chapter 11: Energy, Infrastructure and Transport, para 545.

- 11 Specifically, Forest and Bird sought the following addition to IM-M4: “amend regional and district plans to provide for initiatives that reduce greenhouse gas emissions”.<sup>3</sup>
- 12 The section 42A report proposes deletion of IM-M4, with associated amendment to IM-M3 which requires local authorities to *inter alia* “develop adaptation pathways ... where possible”.<sup>4</sup>
- 13 As proposed to be amended, IM-M3 is focused on adaptation and resilience, it does not seek to mitigate greenhouse gas emissions. EDS considers that both are required, and that climate change mitigation provisions are equally important for the pORPS. Mr Renwick’s evidence supports this imperative.
- 14 For that reason, EDS supports Forest and Bird’s submission that the Council develop climate change responses for the region which provide for initiatives that reduce greenhouse gas emissions.

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<sup>3</sup> Forest and Bird submission, p 18.

<sup>4</sup> S42A Report, Chapter 6: Integrated Management, para 531 - 532.