

**BEFORE INDEPENDENT HEARING COMMISSIONERS AT DUNEDIN**  
**MAI I KĀ KAIKŌMIHANA MOTUHAKE KI ŌTEPOTI**

**UNDER**

the Resource Management Act  
1991 ("**RMA**")

**AND**  
**IN THE MATTER OF**

the Proposed Otago Regional  
Policy Statement 2021  
(non-freshwater parts) ("**PORPS**")

**AND**

the Ecosystems and indigenous  
biodiversity, Energy, infrastructure  
and transport and Integrated  
management provisions of the  
PORPS

---

**SUBMISSIONS ON BEHALF OF SUSTAINABLE TARRAS INC for**  
**HEARINGS**

Dated 17 March 2023

---

## SUBMISSIONS ON BEHALF OF SUSTAINABLE TARRAS

May it please the Commissioners | Ki kā Kaikōmihana

### Introduction

1. Sustainable Tarras (**ST**) was established in 2020, with the objective to engage with residents of Central Otago and wider New Zealand on sustainability issues affecting our region, to inform and stimulate discussion and represent significant public interests affecting sustainability in the Upper Clutha.
2. Tarras is a small township on the edge of the Lindis valley, is the gateway for visitors who arrive by road from the north to Central Otago, Wanaka and Queenstown, and is surrounded by Significant Natural Areas, Outstanding Natural Landscapes and Features, Natural Wetlands, Significant Amenity Landscapes and the Clutha Mata-Au River (please see maps pp.12-15).
3. It took the threat of a council controlled organisation and property developer, Christchurch International Airport (**CIAL**) purchasing 750 hectares of farmland in the centre of Tarras, with the intent to build a greenfield, wide-bodied jet-capable international airport, for us to realise that we needed to get organised if we were to ensure our community voice and values were reflected in the future of Tarras.
4. Like many populations in Otago, we are a small passionate community. We also have a strong sense of the national (and international) treasure that is Central Otago, and feel a great sense of responsibility and guardianship about this special place that is fragile and for which the character would be irreversibly changed with large scale and infrastructure development. We note that of the submitters participating in the hearings, other than the local and central government agencies, the vast majority represent economic imperatives and infrastructure development, which has encouraged us to contribute to the development of this long term and important document.
5. CIAL has submitted on the proposed Otago Regional Policy Statement (**PORPS**) to reduce environmental protections in order to smooth the way for their proposed airport development. CIAL seeks to broaden the definition of regionally significant infrastructure so as to in future get their proposed airport included within this definition and presents evidence suggesting a functional need and operational need for this airport in Central Otago.
6. As a volunteer community based committee with constrained time and expertise, we have been unable to canvas the PORPS in its entirety, rather we have focused on the areas of immediate concern to us, and particularly those clauses that CIAL seeks to influence for its new airport and associated retail and commercial development.

We have drawn on the local knowledge and professional expertise of our ST committee members in order to inform our submission.

7. We thank the Panel for allowing us to combine our submission points on the EIT, ECO and IM chapters, as multiple appearances would have been too difficult for us to commit to. We also thank the Otago Regional Council for the Section 42a reports which have provided some real insights into the why and how of these policies. Thank you lastly to Kate McKinlay, the hearings administrator, for helping us to navigate our involvement in the hearings.

## Context

8. We find ourselves encouraged by the alignment of our comments and recommendations with broader conversations going on nationally, regionally and locally about how we transition away from resource management which has degraded environmental outcomes, to a system which reflects an integrated management approach to natural and built assets and an increased recognition of the need to protect the natural environment upon which our existence depends. We note these strong common threads within the following:
  - (a) The resource management system reform, in particular the focus of integrated management approach in the Spatial Planning Bill with the Regional Spatial Strategies;
  - (b) The various National Policy Statements and standards current and under development;
  - (c) The Parliamentary Commissioner for the Environment's report "*Pristine, popular... imperilled? The environmental consequences of projected tourism growth*" noting that 'despite a longstanding emphasis on sustainability, the existing policy mix is unlikely to prevent a worsening of tourism's environmental burden, and that a different approach will be needed to head off that future.'<sup>1</sup>
  - (d) The Infrastructure Commission's report released in 2022, *Rautaki Hanganga o Aotearoa New Zealand Infrastructure Strategy*<sup>2</sup>, which highlights the role infrastructure has in protecting the environment, through a coordinated and planned approach.
  - (e) Local strategies and plans such as the Central Otago District Council's (CODC) Clutha River Plan 2011<sup>3</sup>, Economic Development Strategy 2019-2024<sup>4</sup>, Sustainability Strategy

---

<sup>1</sup> Parliamentary Commissioner for the Environment, [Pristine, popular... imperilled? The environmental consequences of projected tourism growth](#), December 2019

<sup>2</sup> [Rautaki Hanganga o Aotearoa New Zealand Infrastructure Strategy](#) 2022, page 10.

<sup>3</sup> [Central Otago District Council \(CODC\) Clutha River Plan 2011](#)

<sup>4</sup> [CODC Economic Development Strategy 2019-2024](#)

2019-2024<sup>5</sup>, Central Otago Tourism Strategy 2018-2028<sup>6</sup>, and Central Otago - a World of Difference brand strategy<sup>7</sup>.

- (f) Of local communities surveyed in Wanaka and the Upper Clutha area (including Tarras and immediate surrounds) 72% have expressed clear opposition to a new international wide body jet airport development as well as the expansion of tourism in the Region, particularly in light of its impact on the natural environment, climate change, constrained infrastructure needed to support it<sup>8</sup>, and limits to the natural environment that supports surrounding road infrastructure (alpine pass and river gorge access roads). CODC and Queenstown Lakes District Council have been working with their communities to develop Destination Management Plans, both of which express a fundamental shift from communities serving the interests of tourism to tourism working to support communities and reflect the core values of the place within which they operate. Both documents also recognise the need for regenerative practices to ensure the natural 'capital' of the districts is sustained and enhanced.<sup>9</sup>
- (g) Distinguished Professor James Higham, and 10 other leading New Zealand academics with expertise in tourism, climate change, governance, kaupapa Māori, disaster economics, political science and international relations, to mention a few, have issued an open letter to Christchurch City Council strongly opposing this airport development on several grounds and urging Christchurch City Council to cancel these plans. Since issuing their letter last month the signatory group of academics has grown significantly<sup>10</sup>.
- (h) Closer to home, the CODC has been working with the Tarras community to update the Tarras community plan. The highest valued qualities of the township are its community, the peace and quiet and the beautiful landscape and countryside<sup>11</sup>.

---

<sup>5</sup> [CODC Sustainability Strategy 2019-2024](#)

<sup>6</sup> [Central Otago Tourism Strategy 2018-2028](#)

<sup>7</sup> ["Central Otago - a World of Difference" brand strategy](#)

<sup>8</sup> [Upper Clutha Surveys 2021-2](#) and [Wanaka Survey 2021](#)

<sup>9</sup> [Central Otago Destination Management Plan Summary 2022](#) and [Queenstown Lakes Regenerative Tourism Plan 2022](#)

<sup>10</sup> [www.informedleaders.com](http://www.informedleaders.com) - founding signatories: Professors Steven Ratuva, Huhana Smith, Jonathan Boston, Bronwyn Hayward, Shaun Hendy, Ilan Noy, Anita Wreford, and Distinguished Professors James Higham, Robert McLachlan and Dame Anne Salmond

<sup>11</sup> Central Otago District Council Tarras Community Plan Workshop Results, March 2023

## PORPS commentary and relief sought

9. We are encouraged to see significant alignment in the PORPS, however seek some changes to the wording in order to best give effect to the promising direction outlined above, and to provide insight into how we see these policies reflecting the needs of the Tarras community.
10. These submissions address the following 5 policy sections that remain outstanding from the evidence filed and those policies closely related:
- (a) IM-P1 and P2 (integrated approach to decision-making)
  - (b) IM-P14 (Human Impact)
  - (c) ECO-P6 (Maintaining indigenous biodiversity)
  - (d) Definition of Regionally Significant Infrastructure and airports/aerodromes (p. 42 PORPS Supplementary Evidence Version)
  - (e) EIT-INF-P13 (Locating & managing effects of infrastructure)

POLICY	COMMENTARY	REQUEST
<p>(a)</p> <p>IM-P1 &amp; IM-P2 Integrated approach to decision-making</p>	<p>In Chapter 6, Section 42a Hearing Report, points 199-201, the author describes the degradation of the natural environment under existing frameworks and recommends that <i>“when there is a tension between provisions it is appropriate to favour environmental caution”</i>. ST notes that ‘balancing the goals’ under Section 5 of the Resource Management Act 1991 (<b>RMA</b>) has contributed to degradation of the natural environment as well as an unintegrated management of natural resources, and we argue that environmental protection must take precedence.</p> <p>We support the Section 42a wording of IM-P1, in terms of the way it prioritises the natural environment. However we request a change to the wording of sub-clause (1).</p> <p>In the legal submission of Kāi Tahu, 2 February 2023, page 2, the author notes that ‘Including the “health needs of people” in sub-cl (1) conflates the cumulative safeguards in s 5 (a) to (c) with the enabling aspects of s 5’ and ‘that prioritisation of the health needs of people is already adequately covered</p>	<p>Strongly support Chapter 6 points 199-201.</p> <p>Strongly support the intent of IM-P1 however request changing to the wording as per Kāi Tahu’s submission to remove reference to the health needs of people as this is already captured in the policy wording ‘the life-supporting capacity and mauri of the natural environment’.</p>

	by the inclusion of life-supporting capacity and mauri’.	
(b) IM-P14 Human impact	<p>Pages 8-9 of the PORPS Supplementary Evidence Version describes the diverse geography, landscapes, economies, populations, flora and fauna and climate of the Otago Region. Given this diversity it is important that environmental limits are set with local environmental issues and drivers in mind.</p> <p>In section 6.25.3 p.90 of the Section 42a report the author considers the submission points on environmental limits and seeks to clarify this statement. We agree this is a major issue and seek further clarification on the method(s) used to set environmental limits.</p> <p>We recommend the panel ensures that <u>local</u> environmental issues and characteristics are considered in the setting of environmental limits. This is important for several reasons. If limits are set nationally, then local variations might be missed or excluded – for example:</p> <ol style="list-style-type: none"> <li>1. The settings of the National Policy Statement for Highly Productive Land categories - while nationally soil categories of 4 &amp; 5 are seen as unproductive, it is often these soils which produce the finest wine in Central Otago.</li> <li>2. Light pollution, air quality and noise level limits – if these are set nationally or even at a broad regional level, current high light, air and noise qualities of somewhere like Tarras could be significantly degraded but still meet the environmental limit. As noted above, there is already degradation of the natural environment and any further degradation must be avoided, and these existing qualities protected or improved. It is to be noted that light, air, and noise quality is relevant not only to human well being but also biodiversity sustainability.</li> </ol> <p>We note that this recommendation aligns with point 143(3)(b) p.33 of the Section 42a Introduction and general themes report point: [Environmental limits] ‘May be set at different levels for different circumstances and locations.’</p>	ST supports the majority of IM-P14, however requests that unless IM-P14 (2) achieve this, the wording to be reviewed to check local environmental considerations in the environmental limit setting are a requirement of the process, and that ‘where practicable’ is deleted.

	<p>Secondly ST opposes the inclusion of the words ‘wherever practicable’, a concept which also features in IM-M1(6) p.129 PORPS Supplementary Evidence Version. ‘Wherever practicable’ should be deleted as a concept unless there is a strict definition.</p> <p>ST also strongly supports the 8 February 2023 submission points of Kāi Tahu requesting the retention of IM-P15 The requirements of a precautionary approach. Particularly with the uncertain but significant impacts of climate change here now, a precautionary approach to decision-making becomes of primary concern.</p> <p>ST does not support the inclusion of an additional sub-clause 3 - as proposed by CIAL’s original submission p.8 “Preserve opportunities for future generations by: recognising that regionally significant infrastructure provides an important public benefit and may have functional or operational needs which should be recognised and taken into account”<sup>12</sup>. The EIT section would be the appropriate place to address this.</p> <p>Lastly ST recommends that no large scale infrastructure is consented before the Otago Regional Spatial Strategy (ORSS) is complete under the Spatial Planning Bill. It is the master planning required in order for integrated management to succeed in the region. Creation of the spatial plan will work on the principle that other large scale asset owners would be able to fund and deliver the necessary supporting infrastructure without impacting the local community.</p>	<p>ST opposes the deletion of IM-P15h as recommended by the Section 42a report and supports the submission points made by Kāi Tahu in this regard.</p> <p>ST opposes the introduction of an additional clause as suggested by CIAL and opposed at point 433, p.91 Section 42a report.</p> <p>ST requests the Panel considers that in order to bring about effective and efficient integrated management, no large scale infrastructure is consented until the completion of the ORSS.</p>
<p>(c) ECO-P6 Maintaining indigenous biodiversity</p>	<p>Cyclones Hale and Gabrielle have demonstrated that we are part of a climate disrupted world, and without bold measures in place to protect the natural environment, human health and well-being will be increasingly impacted. A healthy community and thriving economy is entirely dependent on a stable biosphere. Protecting and restoring our indigenous biodiversity is an integral and essential part of this.</p> <p>We note in the PORPS Supplementary Evidence Version SRMR-17 page 99, that ‘Rich and varied</p>	<p>ST requests the wording be changed to ‘Protecting, or, if degraded, restoration of indigenous biodiversity.’</p> <p>This equally applies to ECO-P4 Provision for new activities.</p>

<sup>12</sup> [CIAL Submission on Proposed Otago Regional Policy Statement](#)

	<p>biodiversity has been lost or degraded due to human activities and the presence of pests and predators.’ We also reiterate the comments of Chapter 6 on IM, points 199-201 about the degraded state of the natural biodiversity in the Otago Region. This suggests that no further degradation can be afforded.</p> <p>While we strongly support the intent of ECO-P6, we oppose the first word. Maintaining Otago’s indigenous biodiversity is not enough when we’re starting from a degraded base. We recommend drawing from Clause 5(a) of the Natural and Built Environment Bill 2022. As a system outcome: ‘the protection or, if degraded, restoration, of’ followed by the list of outcomes being sought.</p> <p>ECO-P6 5(b) states that if residual adverse effects cannot be compensated for in accordance with APP4 then the activity is to be avoided. CIAL proposes on p.9 of their original submission to delete this clause as they claim residual effects will mostly be “less than minor or de minimis”<sup>13</sup>. They argue that activity avoidance if there are residual effects that cannot be offset or compensated for is not warranted. There are several issues with this approach, for example 1. It is in conflict with the intent of ECO-P6 to maintain (or protect/restore) indigenous biodiversity. 2. measurement (and forecasts) of residual effects or indeed offset activity impacts are highly problematic. As per the discussion under IM-P1&amp;2, “<i>when there is a tension between provisions it is appropriate to favour environmental caution</i>” which applies to indigenous biodiversity.</p>	<p>ST strongly supports ECO-P8 p.70 Enhancement and ECO-P10 p.77 Integrated management policies as worded in the Section 42a Report.</p> <p>We oppose the proposed deletion of Clause 5(b) as proposed by CIAL and strongly support the Section 42a Report wording p. 60.</p>
<p>(d) Definition of Regionally Significant Infrastructure</p>	<p>CIAL seeks to broaden this definition and allow for the future inclusion of other airports/aerodromes. We do not see this as appropriate. The current regionally significant infrastructure definition captures infrastructure that has a functional need and operational need <b>to be in a particular location</b> or has a historical reason for being there, and environmental trade-offs are therefore made in various RMA &amp; PORPS clauses for these infrastructures. They include Lifelines Infrastructure such as roads, electricity, telecommunication and water assets. Existing airports were historically also</p>	<p>ST fully supports the retention of currently notified text p.42 PORPS Supplementary Evidence Version p.42, and strongly opposes the broadening of the definition of “regionally significant infrastructure” and the addition of</p>

<sup>13</sup> [CIAL Submission on Proposed Otago Regional Policy Statement](#)



	<p>included. For the newly proposed airport in Central Otago, or other parts of Otago for that matter, however neither a functional need nor operational need in the proposed location is apparent nor demonstrated.</p> <p>In addition, a new airport would be afforded significant additional protections (under the Airport Authorities Act, sections 3,4,9) that allow for the building of solar electricity generation, possible hydrogen production facilities, hotels, car parking facilities incl. rental, fuel stations, restaurants, etc that would then likely also fall under “regionally significant infrastructure”. To assume a new airport proposal as future “regionally significant infrastructure” which would then receive the same concessions as established airports were afforded in the past under very different approval conditions, as well as infrastructure that has a clear functional and operational need to be <u>in a particular location</u> is not appropriate.</p> <p>Of note is that a new airport in this region is basically acting as a land development activity, in competition to other airports and other nearby businesses. A large percentage of airport annual revenue and profit comes from these ancillary activities, rather than pure flight related activity. This predominantly does not apply to the other types of infrastructure included under the definition of regionally significant infrastructure. For instance we would not expect a new Transpower-type organisation to set up new transmission lines in sensitive areas, merely to provide for the opportunity to provide car parks, restaurants, etc. Lifeline infrastructure does not include this new airport.</p> <p>With regard to the definitions of airports and aerodromes we urge caution to assume they can be interpreted as interchangeable in the various higher order documents and PORPS. We rather suspect aerodromes not to have the additional facilities as mentioned above included, whereas airports do, ie. aerodromes to be mere airfields, airports to have all of the additional facilities. So we ask that a clear assessment is made of these likely differences in the</p>	<p>“including”as proposed by CIAL.</p> <p>Allowing a pathway for inclusion of new airports in the pORPS before the full ramifications are adequately investigated and assessed is not appropriate in our view.</p> <p>To deny an interchangeable definition of airports and aerodromes.</p>
--	---	---

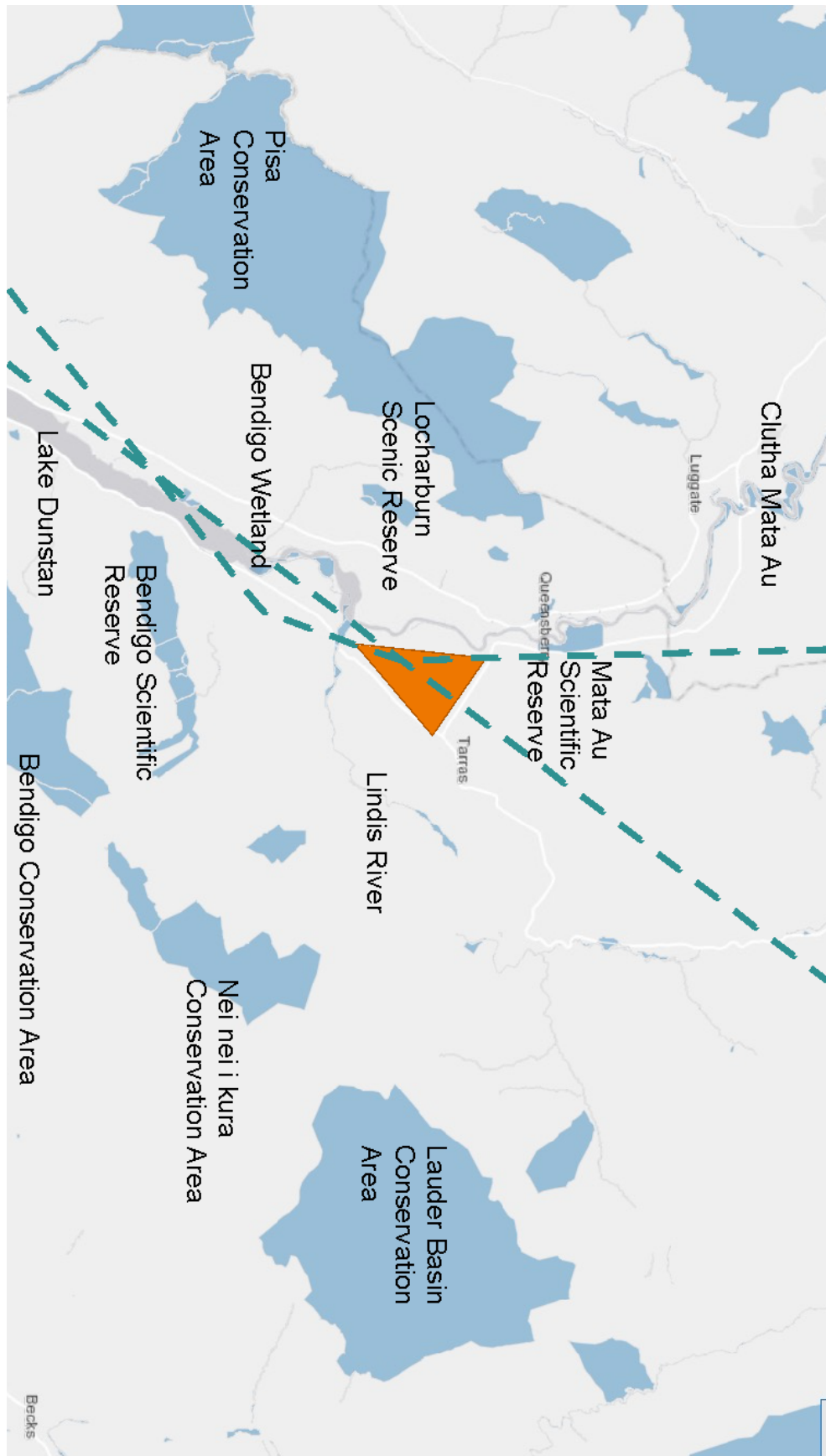
	<p>relevant Acts and higher order documents before assuming interchangeability.</p> <p>Likewise we would like to express our concerns regarding the proposed 30 seater aeroplane definition. We are concerned this may in future exclude smaller airports such as Cromwell, Alexandra, etc who do not currently operate these services regularly (and may not currently be able to) and are classified under regionally significant infrastructure as lifeline utility airports(refer Civil Defence Emergency Management Act, incl. schedule 1 and clause 61).</p>	
<p>(e)</p> <p>EIT-INF-P13 – Locating and managing effects of infrastructure, nationally significant infrastructure and regionally significant infrastructure outside the coastal environment</p>	<p>In <i>Rautaki Hanganga o Aotearoa New Zealand Infrastructure Strategy</i><sup>14</sup> Te Waihanga, the Infrastructure Commission notes the critical need to maximise the use of existing infrastructure, for reduced cost and carbon emissions.</p> <p>ST fully supports the notified clause in the Section 42a report. In our view a Tarras Airport development is the antithesis of this clause - it is ad hoc, unnecessary and draws attention away from maximising existing infrastructure within the broader region. The proposed notified clause EIT-INF P13 <u>partially</u> protects our unique Central Otago natural environments and landscapes from questionable semi-industrial development and its effects and is a cornerstone of the PORPS' objective for more appropriate environmental protections. This is currently only partially so, as an airport may be built on land <u>bordering</u> significant natural areas, outstanding natural features and landscapes, natural wetlands, outstanding water bodies, etc. The enabling outcomes and effects of an airport in these bordering locations (flights, emissions, noise, air quality, light pollution, etc) are such that they will significantly affect these neighbouring areas and the values we hold about them in ways that current policy statements do not cover. As such we need to be very careful affording an airport, or any other significant new proposal of similar nature, an easier path to locating its infrastructure <u>in or adjacent</u> to these areas.</p>	<p>ST fully supports the notified clause EIT-INF-P13 in the Section 42a report.</p>

<sup>14</sup> [Rautaki Hanganga o Aotearoa New Zealand Infrastructure Strategy](#) 2022, pp 12, 29, 33

	<p>Seeking to delete this clause in its entirety as submitted by CIAL original submission p.10 (and seeking to delete avoidance after being unable to meet offsetting and/or compensation) demonstrates a lack of respect for the environment by the developer and its desire to seek easier approval paths at all cost.</p>	
<p>Minute 6 – Caucusing on regionally significant issues</p>	<p>Given the lengthy and engaged discussion in sessions such as the CIAL submissions and questions we are concerned about the secondary and exclusive process of caucusing by selected RSI parties who can afford planning experts to participate but not others. For ST this works to amplify the contributions of the entities seeking economic outcomes and diminishes the community voice given only expert planners are invited to participate.</p>	<p>ST has reservations about the outcome of Minute 6. If any proposed wording or changes to the PORPS are proposed out of this caucusing, they must be circulated to all submitters for opportunity to consider and respond to prior to consideration for the Panel.</p>

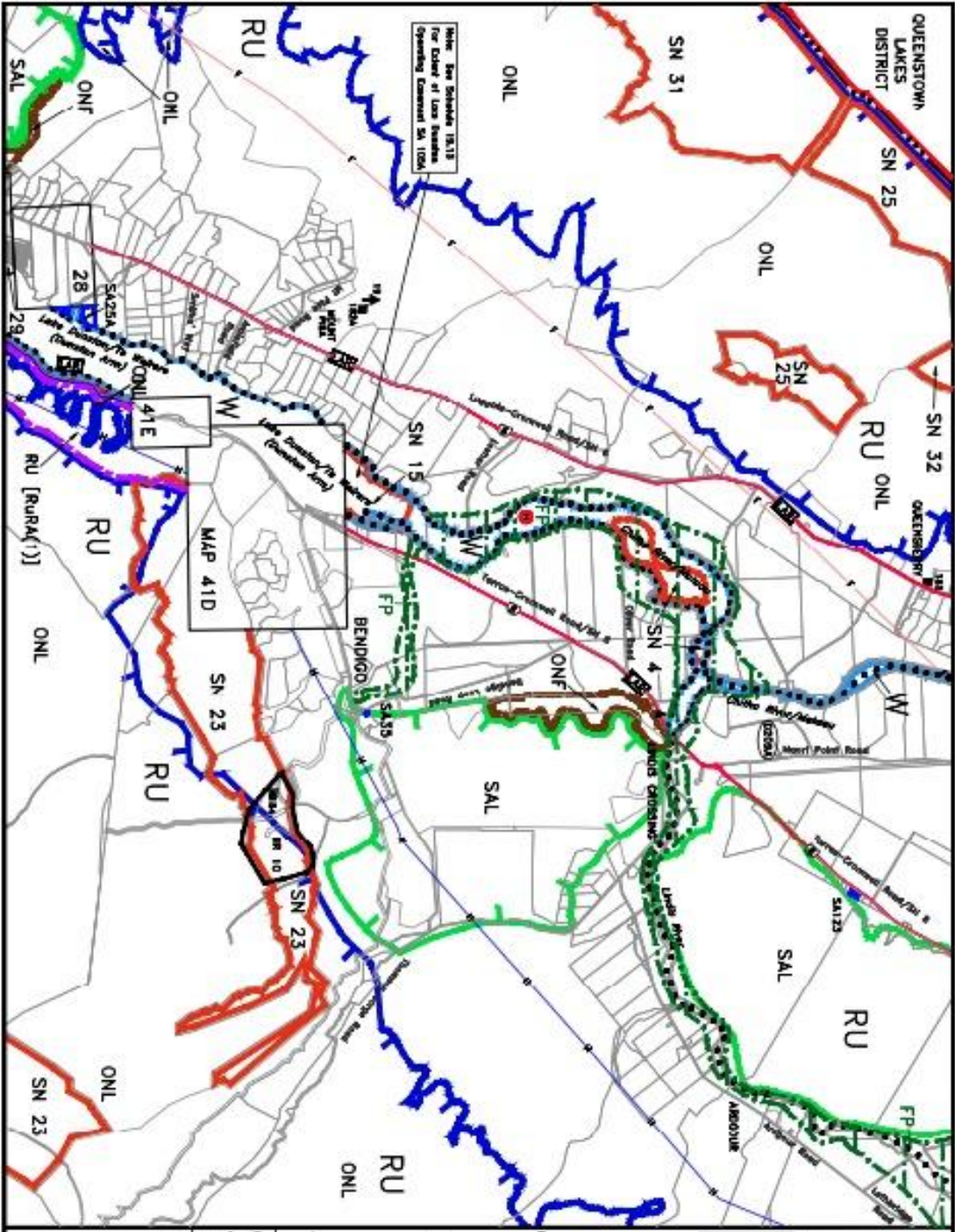
**Dated** 17 March 2023

Suze Keith & Duncan Kenderdine  
Representing Sustainable Tarras Incorporated Society



Orange triangle demarking the land purchased by Christchurch City Council-owned Christchurch International Airport for the proposed international jet-capable airport based in Tarras, Central Otago. The map also portrays the protected areas surrounding the site.





LOCATION

47 48

47	48
51	52

47 48 49

Scale 1:60,000  
( at A3 )



Northpoint Vertical

See LEGEND for key to map notations

Approved: 9 December 2008  
15 July 2013  
18 September 2014

Publicly Notified: 18 July 1998  
Amended by Decisions: 1 July 2000  
Openable Date: 1 April 2008

CENTRAL OTAGO DISTRICT PLAN

# MAP 48

# Central Otago District Planning Maps

## LEGEND

Amended: 28 May 2011  
 15 July 2013  
 18 July 2014  
 20 November 2015

### RESOURCE AREAS

-  Rural Resource Area
-  Residential Resource Area
-  Business Resource Area
-  Industrial Resource Area
-  Rural Settlements Resource Area
-  Water Surface and Margin Resource Area

### DESIGNATIONS

-  Designation (Schedule 19.2)
-  Limited Access Road (Urban Map)
-  Limited Access Road (Rural Map)
-  State Highway (Urban Map)
-  State Highway (Rural Map)

### SCHEDULED ACTIVITIES

-  Scheduled Activities (Schedule 19.3)

NOTES: 1. All legal titles are deemed to be designated.  
 2. All designated land subject to underlying Resource Area provisions that apply where such land is to be used for a purpose other than the designated purpose.  
 3. Surface of any waterway deemed to be in Water Surface and Margin Resource Area.  
 4. Other Rural Landscapes (ORL) are Landscapes in the Rural Resource Area not identified as ORL, TRL or LRL.  
 5. Cadastral information correct as at 1 December 2010.  
 6. Size of symbols as shown in legend may vary when shown on Planning Maps.  
 7. Cadastral information from Land Information New Zealand (LINZ).  
 8. OWNERSHIP DEEMED WHERE NOT SPECIFIED.  
 9. OWNERSHIP DEEMED WHERE NOT SPECIFIED.

### HERITAGE VALUES

-  Heritage Precinct
-  Heritage Building, Place, Site or Object (Schedule 19.4)
-  Notable Tree (Schedule 19.4)
-  Historic Reserve (Schedule 19.10)
-  Area of Significant Natural Value (Schedule 19.6.1)
-  Additional Wetlands (Schedule 19.6.4)
-  Outstanding Natural Feature (Schedule 19.6.2)
-  Significant Amenity Landscape
-  Upper Manorburn / Lake Onslow Landscape Management Area
-  Esplanade Provision (Schedule 19.9)
-  Nohonga (Traditional Camping)

### HAZARDS

-  Flood prone land (Schedule 19.11)
-  Mixed Area (Urban Maps)
-  Mixed Area (Rural Maps)
-  Active Geological Fault
-  Filled Area (including doped landfills)
-  Area of Subsidence or Slippage
-  High Voltage Transmission Lines that are part of the transmission network (See Rules 4.7.6 A (g) and 12.7.8)

### OTHER NOTATIONS

-  District Boundary
-  Resource Area Boundary (where distinction required)
-  Resource Area Boundary underlying a Designation
-  Area subject to enlarged planning Map
-  Rural Residential (See Rule 4.7.2 (b))
-  Rural Resource Area (1) - (4) (See Rule 4.7.2 (b), (c), (d), (e))
-  Residential Resource Area (1) - (12) (See Rule 7.3.3 (1)(c))
-  Business Resource Area (1) (See Rule 4.3.6 (b))
-  Residential Resource Area (See rule 7.3.6(1)(12) - Sloping Sites)
-  Airport Protection Zone (See Rule 4.7.6 A (1))
-  Proposed Road Alignment
-  Actual position of formed road (For information purposes only)
-  Road to be Stopped
-  Sliding Line Restriction
-  Verandah Required (See Rule 8.3.6(1))
-  Building Facades (See Rule 8.3.2 (1))
-  Bridge