

Proposed Regional Policy Statement for Otago

Section 32AA Further Evaluation of Recommended Changes

Otago Regional Council resolved to adopt the recommendations of the Hearing Panel on the Proposed Regional Policy Statement for Otago at its meeting on Wednesday 28 September 2016, as follows:

That Council:

- 1) Adopt the recommendations of the Hearing Panel on the Proposed Regional Policy Statement for Otago as its decision;*
- 2) Publicly notify its decisions on the Proposed Regional Policy Statement for Otago on Saturday 1 October 2016; and*
- 3) Notify submitters of its decisions.*

All references to the recommendations of the Hearing Panel must now be read as being the decisions of Council in the following report.

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Abbreviations	
AER	Anticipated Environmental Result
Local authority	Regional, city and district councils
Territorial authority	City and district councils
ORC	Otago Regional Council
PRPS	Proposed Regional Policy Statement for Otago
RMA	Resource Management Act 1991
NPS	National Policy Statement
NPSFM	National Policy Statement for Freshwater Management 2014
NZCPS	New Zealand Coastal Policy Statement
NES	National Environmental Standard
section	A reference to another section in this report or a section in the PRPS.
s or ss	A section or sections of the RMA or other legislation.
Recommendation Report	Recommendations of the Hearing Panel to Council on the Proposed Regional Policy Statement

1 Introduction

1.1 Purpose

This report evaluates the proposed changes to the PRPS in accordance with the Recommendation Report.

1.2 Report Structure and Content

This report has the same structure as the Recommendation Report. The sections of the Recommendation Report that require a s32AA further evaluation are addressed in the same order and under the same headings.

The s32AA further evaluation for each theme contains an assessment of:

- Whether the amended objectives are the best way to achieve the purpose of the RMA.
- The reasonably practicable options for achieving those objectives.
- The environmental, social, economic and cultural benefits and costs of the amended provisions.
- The efficiency and effectiveness of the provisions for achieving the objectives.
- The risk of acting or not acting where there is uncertain or insufficient information about the provisions.

The reasons for deciding on the recommended changes are contained in the Recommendation Report.

The s32AA further evaluation contains a level of detail that corresponds to the scale and significance of the anticipated effects of the changes that have been made.

Recommendations on editorial, minor and consequential changes that improve the effectiveness of provisions without changing the policy approach are not re-evaluated. No re-evaluation has been undertaken if the amendments have not altered the policy approach.

References to provisions follow the numbering system for the notified PRPS.

2 PRPS as a Whole

2.1 Recommendation to Accept the PRPS

There are no changes recommended to the PRPS provisions that require further evaluation.

2.2 Out of Scope Submissions

There are no changes recommended to the PRPS provisions that require further evaluation.

2.3 Minor and Consequential Amendments

There are no changes recommended to the PRPS provisions that require further evaluation.

3 Legal Requirements

3.1 Section 62 of the RMA

There are no changes recommended to the PRPS provisions that require further evaluation.

3.2 Section 32 of the RMA

There are no changes recommended to the PRPS provisions that require further evaluation.

3.3 Section 42A of the RMA

There are no changes recommended to the PRPS provisions that require further evaluation.

4 PRPS Approach

4.1 Outcomes Based Approach

Amendments are made to the outcomes and their descriptions to make the purpose clearer. No assessment of these changes is required in accordance with s32AA of the RMA as the outcomes are not objectives, policies or methods.

4.2 Chapter Sequence

Explanatory text has been added to the “How to Use the PRPS” diagram to illustrate how the chapters interrelate but do not establish a hierarchy. No assessment of these changes is required in accordance with s32AA of the RMA as this diagram is not an objective, policy or method. The amendment improves the PRPS’s effectiveness by clarifying how to use it.

4.3 Structure and Ease of Use

A number of structural changes have been made to the PRPS to improve its structure and make it easier to use. No assessment of these changes is required in accordance with s32AA of the RMA as these amendments do not affect the content of the objectives, policies or methods.

4.4 Values

4.4.1 Objective assessment

Not applicable.

4.4.2 Evaluation of changes to proposed provisions

Section 4.4 of the Recommendation Report recommends changes to the use of the term ‘values’ in provisions in the PRPS.

The recommended changes are the most appropriate way to achieve the objectives of the PRPS. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none">The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions about the confusing use of the term ‘values’.	
BENEFITS	COSTS

ENVIRONMENTAL	
• No change.	• No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
• No change.	• No change.
SOCIAL	
• No change.	• No change.
CULTURAL	
• No change.	• No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> Clarifying what is meant by 'values', and removing the unnecessary use of the term throughout the PRPS will make the document more efficient and effective as it will be easier to understand and reduce repetition. 	

4.5 Use of the Term "Avoid"

4.5.1 Objective assessment

Not applicable.

4.5.2 Evaluation of changes to proposed provisions

Section 4.5 of the Recommendation Report recommends a change to the use of the term 'avoid' in provisions in the PRPS.

The recommended change is the most appropriate way to achieve the objectives of the PRPS. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions about the use of the term 'avoid'. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> Including 'avoid' in provisions which require adverse effects to be remedied or mitigated ensures 'avoid' can be used to address adverse environmental effects. 	<ul style="list-style-type: none"> No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> Including 'avoid' in provisions which require adverse effects to be remedied or mitigated ensures 'avoid' can be used to address adverse economic 	<ul style="list-style-type: none"> No change.

effects.	
SOCIAL	
<ul style="list-style-type: none"> Including 'avoid' in provisions which require adverse effects to be remedied or mitigated ensures 'avoid' can be used to address adverse social effects. 	<ul style="list-style-type: none"> No change.
CULTURAL	
<ul style="list-style-type: none"> Including 'avoid' in provisions which require adverse effects to be remedied or mitigated ensures 'avoid' can be used to address adverse cultural effects. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> Including 'avoid' in provisions which require adverse effects to be remedied or mitigated will improve the effectiveness of the PRPS by providing another option to manage the adverse effects of subdivision, use or development. 	

4.6 Functional Needs

4.6.1 Objective assessment

Not applicable.

4.6.2 Evaluation of changes to proposed provisions

Section 4.6 of the Recommendation Report recommends changes regarding 'functional needs' in the PRPS.

The recommended changes are the most appropriate way to achieve the objectives of the PRPS. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not clarify what is meant by 'functional need/s', 'functional necessity' and 'locational needs' in the PRPS. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> Defining 'functional needs' gives infrastructure providers and petroleum and mineral activities more certainty as to which needs will be recognised in the PRPS. 	<ul style="list-style-type: none"> No change.

SOCIAL	
<ul style="list-style-type: none"> Defining 'functional needs' gives infrastructure providers more certainty as to which needs will be recognised in the PRPS. This appropriately recognises the needs of infrastructure, which benefits people and communities. 	<ul style="list-style-type: none"> No change.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> Amending the PRPS provisions to use the term 'functional needs' and adding a definition of 'functional needs' will make the provisions more effective by providing certainty as to what 'functional needs' means. 	

4.7 Recognising and Providing for Specific Activities

There are no changes recommended to the PRPS provisions that require further evaluation.

4.8 Consistency with RMA Terminology

4.8.1 Objective assessment

Not applicable.

4.8.2 Evaluation of changes to proposed provisions

Section 4.8 of the Recommendation Report recommends changes regarding consistency with RMA terminology in the PRPS provisions.

The recommended changes are the most appropriate way to achieve the objectives of the PRPS. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised regarding the need to better align the terms used in the PRPS with the RMA. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> The terms in the PRPS are now better aligned with the RMA; this provides more certainty for assessing environmental effects. 	<ul style="list-style-type: none"> No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	

<ul style="list-style-type: none"> As the terms in the PRPS align better with the RMA, this provides more certainty for assessing economic effects. 	<ul style="list-style-type: none"> No change.
SOCIAL	
<ul style="list-style-type: none"> As the terms in the PRPS align better with the RMA, this provides more certainty for assessing social effects. 	<ul style="list-style-type: none"> No change.
CULTURAL	
<ul style="list-style-type: none"> As the terms in the PRPS align better with the RMA, this provides more certainty for assessing cultural effects. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> Aligning terms in the PRPS with the RMA improves the efficiency and effectiveness of the PRPS as the amendments provide more clarity. 	

4.9 Language and Grammar

4.9.1 Objective assessment

Not applicable.

4.9.2 Evaluation of changes to proposed provisions

Section 4.9 of the Recommendation Report recommends language and grammar changes to the PRPS provisions.

The recommended changes are the most appropriate way to achieve the objectives of the PRPS. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions about terms that were unclear. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> The amended terms provide more certainty for assessing environmental effects. 	<ul style="list-style-type: none"> No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> The amended terms provide more certainty for assessing economic effects. 	<ul style="list-style-type: none"> No change.
SOCIAL	

<ul style="list-style-type: none"> The amended terms provide more certainty for assessing social effects. 	<ul style="list-style-type: none"> No change.
CULTURAL	
<ul style="list-style-type: none"> The amended terms provide more certainty for assessing cultural effects. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> Clarifying terms in the PRPS and amending spelling and grammar improves the efficiency and effectiveness of the PRPS. 	

5 New Chapter on Integrated Resource Management

5.1 Integrated Resource Management

5.1.1 Objective assessment

RELEVANT OBJECTIVES:

- ~~2.3 Natural Resource Systems and their interdependencies are recognised.~~
- 1.1 Recognise and provide for the integrated management of natural and physical resources to support the wellbeing of people and communities in Otago.

The new chapter and objective clarify and enhance the PRPS's focus on integrated resource management.

As all policies in Policy Suite 2.3 are moved to the new Chapter, Objective 2.3 is deleted as a consequential amendment.

5.1.2 Evaluation of changes to proposed provisions

Section 5.1 of the Recommendation Report recommends changes to the integrated management provisions in the PRPS.

The recommended changes are the most appropriate way to achieve the objective relating to integrated management. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> • The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the requests in submissions to better provide for social, cultural and economic wellbeing, health and safety and integrated management in the PRPS. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> • Refining and combining Policies 2.3.1 – 2.3.5 into one policy and moving this to the new policy suite simplifies content and ensures that integration among and between all natural resources is considered. 	<ul style="list-style-type: none"> • No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> • The new policy on economic wellbeing enables the subdivision, use and 	<ul style="list-style-type: none"> • No change.

development of resources where this is in accordance with the provisions of the PRPS.	
SOCIAL	
<ul style="list-style-type: none"> The new policy ensures that social wellbeing and the health and safety of people and communities are provided for when undertaking subdivision, use and development. 	<ul style="list-style-type: none"> No change.
CULTURAL	
<ul style="list-style-type: none"> The new policy ensures that cultural values are recognised and provided for when undertaking subdivision, use and development and the protection of natural and physical resources. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> Refining and combining Policies 2.3.1 – 2.3.5 into one policy and moving them to the new policy suite on integration reinforces the PRPS's integrated approach, and improves efficiency and effectiveness. The new chapter improves the efficiency and effectiveness of the PRPS by locating the policies that relate to all resources and all activities within the first chapter. Clarification of the provision on resource management services across administrative boundaries will improve efficiency and effectiveness by requiring consistent resource management. 	

6 Kāi Tahu Values and Interests

6.1 Kāi Tahu Provisions

6.1.1 Objective assessment

RELEVANT OBJECTIVES:

- 1.1 The principles of Te Tiriti o Waitangi are taken into account in resource management processes and decisions
- 1.2 Kāi Tahu values, ~~rights~~ and interests and customary resources are sustained

Changes to Objective 1.1 clarify that the Treaty principals will be taken into account in decision making and throughout the resource management process.

'Rights' is removed from Objective 1.2, as it is not a term that is used in any policies or methods. This improves the clarity of the PRPS.

6.1.2 Evaluation of changes to proposed provisions

Section 6.1 of the Recommendation Report recommends changes to the Kāi Tahu provisions in the PRPS.

The recommended changes are the most appropriate way to achieve the objectives relating to Kāi Tahu values. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> • The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions and would not give effect to the RMA. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> • No change. 	<ul style="list-style-type: none"> • No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> • No change. 	<ul style="list-style-type: none"> • No change.
SOCIAL	
<ul style="list-style-type: none"> • No change. 	<ul style="list-style-type: none"> • No change.
CULTURAL	
<ul style="list-style-type: none"> • The amendment to Policy 1.1.1 to promote 'understanding' of Treaty obligations will support increased recognition and application of Treaty principals. 	<ul style="list-style-type: none"> • Amendments to remove the role of Kāi Tahu in decision making throughout the PRPS may not result in the level of decision making input sought by Kāi Tahu. However, the changes are consistent with the RMA. The methods

<ul style="list-style-type: none"> • Amending Policy 1.2.3 to include ‘using’ traditional place names will ensure these are used more frequently and consistently across the region. • Deleting Kāi Tahu values as a consideration from a number of policies and requiring the consideration for Kāi Tahu values in the new policy on social and cultural wellbeing will ensure that Kāi Tahu values are a consideration in all subdivision, use and development. • Amending Policy 1.2.4 to enable the protection, development and use of land ‘and resources’ in native reserves will support the use and development to provide for Kāi Tahu well-being. • New methods provide additional ways to ensure Kāi Tahu values are recognised and provided for in resource management processes. 	<p>still provide the opportunity to transfer decision making powers to an iwi authority in accordance with s33.</p> <p>Removing the requirement to provide for other areas in Otago in a manner similar to Statutory Acknowledgement areas may not result in Kāi Tahu’s desired level of involvement with those areas. However, this is consistent with the terms of the Ngāi Tahu Claims Settlement Act 1998.</p>
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> • Aligning the provisions with the terms used in the RMA will provide more clarity about how to apply them. • Deleting repetition such as the provision for access in Provision 1.2.4 a) and simplifying the provisions such as combining Policies 2.2.2 and 2.2.3 improves effectiveness by reducing duplication. • Amending Schedules 1A, 1B and 1C clarifies that the schedules are a guide to Kāi Tahu values and not a complete list. 	

7 Otago has High Quality Resources and Ecosystems

7.1 Management and Protection of Natural Resources

7.1.1 Objective assessment

RELEVANT OBJECTIVES:

- 2.1 The values of Otago's natural and ~~physical~~ resources are recognised, maintained and enhanced
- 2.2 Otago's significant and highly valued resources are identified, and protected or enhanced

Objective 2.1 has been amended so that it applies to natural resources only. This aligns the objective with its accompanying policies and better serves the sustainable management purpose of the RMA.

7.1.2 Evaluation of changes to proposed provisions

Section 7.1 of the Recommendation Report recommends changes to the issues, objectives, principal reasons and explanations of Policy Suites 2.1 and 2.2.

The recommended changes are the most appropriate way to achieve the objectives relating to the management and protection of natural resources. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> • The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not clarify the intent of Policy Suites 2.1 and 2.2 and would not simplify and streamline the PRPS. 	
BENEFITS	COSTS
ENVIRONMENTAL	
• No change.	• No change.
ECONOMIC INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
• No change.	• No change.
SOCIAL	
• No change.	• No change.
CULTURAL	
• No change.	• No change.

EFFICIENCY & EFFECTIVENESS
<ul style="list-style-type: none"> The amendments to the introductions, explanations and principal reasons will more clearly explain the different outcomes the policy suites seek to achieve and will improve the ease of use and effectiveness of the PRPS. The amendments simplify the language and align the language used with the RMA.

7.2 Freshwater

7.2.1 Objective assessment

RELEVANT OBJECTIVES:
<ul style="list-style-type: none"> 2.1 The values of Otago's natural and physical resources are recognised, maintained and enhanced

Objective 2.1 has been amended to apply to natural resources only. This clarifies the purpose of the objective to more appropriately achieve the sustainable management purpose of the RMA.

7.2.2 Evaluation of changes to proposed provisions

Section 7.2 of the Recommendation Report recommends changes to the freshwater provisions in the PRPS.

The recommended changes are the most appropriate way to achieve the objectives relating to freshwater. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions and would not support the need to simplify and clarify PRPS provisions, and improve consistency with the RMA and NPSFM. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> The amendments to Policy 2.1.2 will ensure riparian vegetation is addressed in the policy. The new requirement to identify freshwater management units in Method 3.1 is consistent with the NPSFM, and appropriately manages adverse effects on all freshwater bodies. 	<ul style="list-style-type: none"> No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> Amendments to Provision 2.1.1 p) will ensure adverse effects on existing 	<ul style="list-style-type: none"> No change.

<p>infrastructure reliant on freshwater are avoided, remedied or mitigated.</p> <ul style="list-style-type: none"> Amending Policy 2.1.1 to specifically reference stock water aligns with the RMA. 	
SOCIAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> The amendments make the policies more effective in giving effect to the RMA and NPSFM and addressing issues which were overlooked. Editorial changes to the provisions improve the efficiency and effectiveness of the freshwater provisions by removing duplication and increasing clarity. 	

7.3 Water Allocation and Use

7.3.1 Objective assessment

RELEVANT OBJECTIVES:

- 2.1 The values of Otago's natural and ~~physical~~ resources are recognised, maintained and enhanced

Objective 2.1 has been amended so that it applies to natural resources only.

7.3.2 Evaluation of changes to proposed provisions

Section 7.3 of the Recommendation Report recommends changes to the water allocation and use provisions in the PRPS.

The recommended changes are the most appropriate way to achieve the objectives relating to water allocation and use. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions and would not align with the aim of simplifying and streamlining the PRPS. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	

<ul style="list-style-type: none"> Amending Provision 4.4.1 b) to 'encourage' rather than 'require' development or upgrade of infrastructure reduces costs for infrastructure providers. 	<ul style="list-style-type: none"> No change.
SOCIAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> The amendments make the policies more effective by giving effect to the RMA, while not imposing costs on infrastructure providers. Splitting the policy into two, and moving it to Policy Suite 2.1 improves its efficiency and effectiveness by clarifying the two distinct issues within the policies, and simplifying the layout of the PRPS. 	

7.4 Outstanding Water Bodies and Wetlands

7.4.1 Objective assessment

RELEVANT OBJECTIVES:

- 2.2 Otago's significant and highly valued natural resources are identified, and protected or enhanced.

No amendments are recommended to Objective 2.2.

7.4.2 Evaluation of changes to proposed provisions

Section 7.4 of the Recommendation Report recommends changes to the outstanding water bodies and wetlands provisions in the PRPS.

The recommended changes are the most appropriate way to achieve the objectives relating to outstanding water bodies and wetlands. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions and would not give effect to the NPSFM. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> Amending Policies 2.2.12 and 2.2.13, and adding new policies will ensure that the significant values of all wetlands 	<ul style="list-style-type: none"> No change.

now have protection under the PRPS, to align with the NPSFM.	
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
• No change.	• Additional cost of identifying significant values of all wetlands.
SOCIAL	
• No change.	• No change.
CULTURAL	
• No change.	• No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> • Giving effect to the NPSFM increases the efficiency and effectiveness of the PRPS. • There will be increased costs relating to the identification of significant values of all wetlands but this is required by the NPSFM. • Removing duplication improves clarity and ease of use. 	

7.5 Coast

7.5.1 Objective assessment

<p>RELEVANT OBJECTIVES:</p> <ul style="list-style-type: none"> • 2.1 The values of Otago's natural and physical resources are recognised, maintained and enhanced • 2.2 Otago's significant and highly-valued natural resources are identified, and protected or enhanced

Objective 2.1 has been amended so that it applies to natural resources only.

No amendments are recommended to Objective 2.2.

7.5.2 Evaluation of changes to proposed provisions

Section 7.5 of the Recommendation Report recommends changes to the coast provisions in the PRPS.

The recommended changes are the most appropriate way to achieve the objectives relating to coast. The reasons for this are summarised in the table below.

OPTIONS
<ul style="list-style-type: none"> • The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions and would not align the PRPS with the NZCPS.

BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> Updating the criteria in Policy 2.2.7 to match Policy 1 of the NZCPS ensures the landward extent of the coastal environment is correctly identified. Separating Policy 2.2.9 into two policies and adding an additional method will ensure that areas of both outstanding and high natural character are appropriately managed and protected. Adding methods will give effect to the NZCPS and ensure that the significance of coastal values is assessed during resource consent processing. 	<ul style="list-style-type: none"> No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> Increased costs will be incurred by Regional Council to identify the extent of nationally important surf breaks.
SOCIAL	
<ul style="list-style-type: none"> Amendments to require the identification and protection of nationally significant surf breaks from adverse effects will ensure surf breaks of national importance are protected. 	<ul style="list-style-type: none"> No change.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> Increased consistency and alignment with the NZCPS will improve the PRPS's efficiency and effectiveness. Amendments to methods will also improve the efficiency and effectiveness of the PRPS by clarifying the responsibilities of local authorities. 	

7.6 Air

7.6.1 Objective assessment

RELEVANT OBJECTIVES:

- 2.1 The values of Otago's natural ~~and physical~~ resources are recognised, maintained and enhanced
- 3.8 Urban growth and development is well designed, reflects local character, and integrates effectively with adjoining urban and rural environments
- 4.5 Adverse effects of using and enjoying Otago's natural and ~~built environment~~ physical resources are minimised

Objective 2.1 has been amended so that it applies to natural resources only.

Adding the term 'and development' to Objective 3.8 ensures that it applies to all development, not just new growth areas.

The terms used in Objective 4.5 have been amended so that all natural and physical resources are addressed by the policy suite.

The clarified objectives better meet the sustainable management purpose of the RMA.

7.6.2 Evaluation of changes to proposed provisions

Section 7.6 of the Recommendation Report recommends changes to the air provisions in the PRPS.

The recommended changes are the most appropriate way to achieve the objectives relating to air. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions and section 5 of the RMA. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> Policy 3.8.1 f) has been simplified to ensure air quality is maintained or enhanced when managing for urban growth. The amendment to Policy 4.5.3 changes the focus of the policy from individual domestic heating appliances to airsheds. The policy is not able to be implemented by regional, city and district councils. 	<ul style="list-style-type: none"> No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> The amendment to Method 4.1.2 removes the requirements on city and district councils to apply and administer conditions of consent, and reduces costs for applicants and councils. 	<ul style="list-style-type: none"> No change.
SOCIAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> The amendments make the policies more effective by giving effect to the RMA, and 	

achieving the purpose of Objectives 3.8 and 4.5.

- The amendments to Method 4.1.2 improve its efficiency and effectiveness by simplifying and clarifying the requirements on city and district councils when administering Policy 3.8.1- f).

7.7 Soil

7.7.1 Objective assessment

RELEVANT OBJECTIVES:

- 2.1 The values of Otago's natural ~~and physical~~ resources are recognised, maintained and enhanced
- 2.2 Otago's significant and highly-valued natural resources are identified, and protected or enhanced
- 4.5 Adverse effects of using and enjoying Otago's natural and physical resources ~~natural and built environment~~ are minimised

Objective 2.1 has been amended so that it applies to natural resources only.

No amendments are recommended to Objective 2.2.

The terms used in Objective 4.5 have been amended to clarify that all natural and physical resources are addressed by the policy suite.

The clarified objectives meet the sustainable management purpose of the RMA.

7.7.2 Evaluation of changes to proposed provisions

Section 7.7 of the Recommendation Report recommends changes to the soil provisions in the PRPS.

The recommended changes are the most appropriate way to achieve the objectives relating to soil. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> • The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions, simplify the provisions or ensure that ORC's responsibilities relating to soil under s30 of the RMA are met. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> • Amending Policy 2.1.14 simplifies the identification of significant soil in the PRPS. • Additions to Method 3 will require regional plans to include provisions to manage adverse effects on soil 	<ul style="list-style-type: none"> • No change.

conservation and protect significant soil.	
<ul style="list-style-type: none"> The additions to Method 4.1.3 will ensure that adverse effects from silt and sediment, as well as dust effects, are appropriately managed. Additions to Method 4.1 will ensure that the protection of significant soils is a consideration when managing growth and development. 	
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
SOCIAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> Amendments to policies, such as deleting Provision 2.1.5 j), reduce duplication and make the PRPS easier to understand and implement. Relocation of Policy 4.5.4 aligns the soil erosion policy with other policies on managing and protecting natural resource. Replacing the terms 'highly valued soil' and 'highly versatile soil' with the term 'significant soils' simplifies the provisions. The additional methods will ensure the soil provisions are implemented effectively. 	

7.8 Ecosystems and Biodiversity

7.8.1 Objective assessment

RELEVANT OBJECTIVES:

- 2.1 The values of Otago's natural and ~~physical~~ resources are recognised, maintained and enhanced
- 2.2 Otago's significant and highly-valued natural resources are identified and protected or enhanced

Objective 2.1 has been amended so that it applies to natural resources only.

No amendments are recommended to Objective 2.2.

7.8.2 Evaluation of changes to proposed provisions

Section 7.8 of the Recommendation Report recommends changes to PRPS provisions relating to ecosystems and biological diversity.

The recommended changes are the most appropriate way to achieve the objectives relating to ecosystems biological diversity. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions or address ORC's responsibilities under s30 of the RMA. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> An addition to Policy 2.1.6 will ensure all biological diversity is maintained or enhanced where the presence of exotic flora and fauna supports indigenous biological diversity. Amendments to Policy 2.1.6 and Schedule 5 clarifies that the policy and schedule apply to marine, terrestrial and freshwater environments. This ensures that the policy manages all ecosystems and biodiversity. Additions to Method 4.1 will require territorial authorities to appropriately manage ecosystems and biological diversity through district plans. Adding a new method to Method 7 to require ORC to undertake a regional biodiversity strategy will provide a coordinated response to biological diversity management and protection, and improve outcomes for biological diversity. An addition to Method 11.2.2 provides for the encouragement of regeneration of habitats when local authorities are facilitating the restoration or enhancement of riparian margins. 	<ul style="list-style-type: none"> No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> Developing a regional biological diversity strategy may increase administration costs for local authorities.
SOCIAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> The amendments to the Schedule 5 title and explanation clarify its purpose and improve consistency with PRPS policies, improving the efficiency and effectiveness of 	

the document.

- The amendments to the Schedule 5 criteria make them easier to interpret and apply.
- A regional biological diversity strategy will provide cohesive and consistent biological diversity management across the region.

7.9 Natural Features, Landscapes and Seascapes

7.9.1 Objective assessment

RELEVANT OBJECTIVES:

- 2.1 The values of Otago's natural and ~~physical~~ resources are recognised, maintained and enhanced
- 2.2 Otago's significant and highly valued resources are identified, and protected or enhanced.

Objective 2.1 has been amended so that it applies to natural resources only.

No amendments are recommended to Objective 2.2.

7.9.2 Evaluation of changes to proposed provisions

Section 7.9 of the Recommendation Report recommends changes to PRPS provisions relating to landscapes, seascapes and natural features.

The recommended changes are the most appropriate way to achieve the objectives relating to landscapes, seascapes and natural features. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> • The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions and would not simplify and streamline the PRPS. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> • Amending the term 'special amenity landscapes and highly valued natural features' in the glossary and provisions simplifies language and ensures consistency with the relevant provisions. 	<ul style="list-style-type: none"> • No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> • No change. 	<ul style="list-style-type: none"> • No change.
SOCIAL	
<ul style="list-style-type: none"> • No change. 	<ul style="list-style-type: none"> • No change.

CULTURAL	
<ul style="list-style-type: none"> Amendments to Method 1.2 will ensure that Kāi Tahu are involved in the identification of natural features, landscapes and seascapes when using Schedule 4's associative attribute 3(b) regarding cultural landscapes. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> The amendments to the provisions increase the effectiveness and efficiency of the PRPS by ensuring the provisions are interpreted and implemented consistently, and removing unnecessary duplication. The amendments to Method 1.2 will provide for effective engagement with Kāi Tahu when identifying natural features, landscapes and seascapes. Making the recommended amendments will ensure consistency with the RMA requirement for a high level of protection for outstanding natural features, landscapes and seascapes; and a lower level of protection for other highly valued natural features, landscapes and seascapes. This accords with sections 6 and 7 of the RMA. 	

7.10 Environmental Enhancement

7.10.1 Objective assessment

<p>RELEVANT OBJECTIVE:</p> <ul style="list-style-type: none"> 2.1 The values of Otago's natural and physical resources are recognised, maintained and enhanced
--

Objective 2.1 has been amended so that it applies to natural resources only.

7.10.2 Evaluation of changes to proposed provisions

Section 7.10 of the Recommendation Report recommends changes to the environmental enhancement provisions in the PRPS.

The recommended changes are the most appropriate way to achieve the objective relating to environmental enhancement. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions and would not improve the structure and ease of use of the PRPS. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> The amendments to Policy 4.4.3 will 	<ul style="list-style-type: none"> No change.

<p>ensure environmental enhancement is not only encouraged, but also facilitated and supported.</p> <ul style="list-style-type: none"> Amending policy suite 2.1 by adding water quantity, protecting and restoring wetlands and improving access to the coast will ensure enhancement of these natural resources are encouraged, facilitated and supported. 	
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
SOCIAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> Relocating Policy 4.4.3 to Policy Suite 2.1 improves the integration and ease of use of the PRPS, making it more efficient and effective. 	

8 Communities in Otago are Resilient, Safe, and Healthy

8.1 Recognising Environmental Constraints

8.1.1 Objective assessment

<p>RELEVANT OBJECTIVES:</p> <ul style="list-style-type: none"> 3.1— Protection, use and development of natural and physical resources recognises environmental constraints
--

Objective 3.1 is deleted as the objective and policy provided little guidance to users of the PRPS.

8.1.2 Evaluation of changes to proposed provisions

Section 8.1 of the Recommendation Report recommends that Policy Suite 3.1 be deleted.

The recommended amendments are the most appropriate way to achieve the objectives of the PRPS. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions regarding content duplication and the PRPS structure. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
SOCIAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> Policy Suite 3.1 is very broad and ambiguous, and the outcomes it seeks are addressed elsewhere in the PRPS. Deleting it reduces the level of duplication and complexity of the PRPS without reducing the intended outcomes. 	

8.2 Natural Hazards

8.2.1 Objective assessment

RELEVANT OBJECTIVE:

- 3.2 Risk that natural hazards pose to Otago's communities are minimised.

No changes are recommended to the objective.

8.2.2 Evaluation of changes to proposed provisions

Section 8.3 of the Recommendation Report recommends amendments to the natural hazard provisions in the PRPS.

The recommended amendments are the most appropriate way to achieve the objective relating to natural hazards. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> • The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions that natural hazard effects are only adverse to people and communities, and the requirement to give effect to the NZCPS. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> • Clarifying in Policy 3.2.2 that natural hazard assessments will be undertaken using the best available information will ensure that any adverse environmental effects are adequately assessed. • Amending Policy 3.2.6 to require avoiding activities in the coastal environment that increase natural hazard risk, gives effect to the NZCPS and will appropriately manage coastal natural hazards. 	<ul style="list-style-type: none"> • No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> • Clarifying in Policy 3.2.2 that natural hazard assessments will be undertaken using the best available information will ensure that any adverse economic effects are adequately assessed. • Amending Policy 3.2.6 to require avoiding activities in the coastal environment that increase natural hazard risk gives effect to the NZCPS and will appropriately manage economic effects from coastal natural 	<ul style="list-style-type: none"> • Amending Policy 3.2.6 to require avoiding activities in the coastal environment that increase natural hazard risk may restrict certain activities from locating in the coastal environment.

hazards.	
SOCIAL	
<ul style="list-style-type: none"> Clarifying in Policy 3.2.2 that natural hazard assessments will be undertaken using the best available information will ensure that any adverse social effects are adequately assessed. Amending Policy 3.2.6 to require avoiding activities in the coastal environment that increase natural hazard risk gives effect to the NZCPS and will appropriately manage social effects from coastal natural hazards. 	<ul style="list-style-type: none"> No change.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> The amendments to the policy suite will make the policies more effective by giving effect to the NZCPS and appropriately assessing adverse effects of natural hazards using the best information available. 	

8.3 Climate Change

8.3.1 Objective assessment

RELEVANT OBJECTIVE:

- 3.3 Otago's communities are prepared for and able to adapt to the effects of climate change

No changes are recommended to the objective.

8.3.2 Evaluation of changes to proposed provisions

Section 8.4 of the Recommendation Report recommends amendments to the climate change provisions in the PRPS.

The recommended amendments are the most appropriate way to achieve the objective relating to climate change. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions about the importance of the precautionary approach and the need to clarify that climate change will cause adverse effects. 	
BENEFITS	COSTS

ENVIRONMENTAL	
<ul style="list-style-type: none"> Amending the principal reasons and explanations better explains the range of potential effects that people and communities should have regard to. 	<ul style="list-style-type: none"> No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
SOCIAL	
<ul style="list-style-type: none"> Amending the principal reasons and explanations better explains the range of potential effects that people and communities should have regard to. 	<ul style="list-style-type: none"> No change.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> The amendments to the issue and principal reasons and explanation make the policies more effective by providing more context about the range of climate change effects and why adopting a precautionary approach in some instances is necessary. 	

8.4 Infrastructure

8.4.1 Objective assessment

RELEVANT OBJECTIVES:

- ~~3.4 Good quality infrastructure and services meet community needs~~
- 3.5 Infrastructure of national and regional significance is managed and developed in a sustainable way

The infrastructure and services objective and the infrastructure of regional and national significance objective have been simplified and streamlined into one objective.

Lifeline utilities and emergency services are now addressed in the natural hazards policy suite. The focus of the objective and amended policy suite is now on all infrastructure. This does not result in any substantive change to the content or intent of the objectives. The amended objective meets the sustainable management purpose of the RMA.

8.4.2 Evaluation of changes to proposed provisions

Section 8.6 of the Recommendation Report recommends amendments to the infrastructure provisions in the PRPS.

The recommended amendments are the most appropriate way to achieve the amended objective on infrastructure. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions regarding reverse sensitivity and the structure and ease of use of the infrastructure policy suites. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> The amendments to Policy 3.4.2 better provide for the management of reverse sensitivity effects on existing land uses. Including navigation infrastructure and defence facilities as infrastructure with national and regional significance provides these activities with additional protection in accordance with Policy 3.5.3. Amending the reverse sensitivity provision in Policy 3.5.3 to avoid reverse sensitivity effects on significant infrastructure to the extent reasonably possible provides it with more effective protection. 	<ul style="list-style-type: none"> The requirement to avoid, remedy or mitigate adverse effects of infrastructure activities on existing land uses may result in increased costs for infrastructure providers. The strengthening of the reverse sensitivity provision in Policy 3.5.3 may limit the establishment of some activities where these may result in reverse sensitivity effects on significant infrastructure.
SOCIAL	
<ul style="list-style-type: none"> The amended policies better provide for the infrastructure needs of people and communities. 	<ul style="list-style-type: none"> The strengthening of the reverse sensitivity provision in Policy 3.5.3 may limit the establishment of some activities where these may result in reverse sensitivity effects on significant infrastructure.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> The amendments to relocate Policies 3.4.1, 3.4.3 and 3.4.4 to other policy suites and to combine the remaining infrastructure provisions into one policy suite for all infrastructure is a more efficient way to structure the PRPS. The amendments to the principal reasons improve the effectiveness of the provisions by explaining the range of infrastructure and infrastructure providers and the importance of infrastructure for social and economic wellbeing. 	

8.5 Energy

8.5.1 Objective assessment

RELEVANT OBJECTIVE:

- 3.6 Energy supplies to Otago’s communities are secure and sustainable.

No changes are recommended to the objective.

8.5.2 Evaluation of changes to proposed provisions

Section 8.5 of the Recommendation Report recommends amendments to the energy provisions in the PRPS.

The recommended amendments are the most appropriate way to achieve the objective relating to energy. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> • The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions and would not give effect to the NPS Renewable Electricity Generation 2011 and the NPS for Electricity Transmission 2008. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> • The amendments to Policies 3.6.1 and 3.6.2 will give effect to the NPS for Renewable Electricity Generation 2011. Supporting the transition to renewable energy and away from non-renewable energy will have positive effects on the environment. 	<ul style="list-style-type: none"> • The development of new renewable electricity generation activities and community scale electricity generation activities may have adverse effect on the environment that will need to be considered through the resource consent process.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> • The amendments to Policies 3.6.1 and 3.6.2 will give effect to the NPS for Renewable Electricity Generation 2011. This supports the investigation, identification and development of new renewable electricity generation activities. 	<ul style="list-style-type: none"> • No change.
SOCIAL	
<ul style="list-style-type: none"> • The amendments to Policies 3.6.1 and 3.6.2 will give effect to the NPS for Renewable Electricity Generation 2011. This supports the development of community scale renewable electricity generation. 	<ul style="list-style-type: none"> • The development of new renewable electricity generation activities and community scale electricity generation activities may have adverse social effects that will need to be considered in the resource consent process.
CULTURAL	

<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> The development of new renewable electricity generation activities and community scale electricity generation activities may have adverse cultural effects that will need to be considered in the resource consent process.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> The amendments to Policy Suite 3.6 and additional definitions improve the efficiency and effectiveness of the provisions by giving effect to the NPS for Renewable Electricity Generation 2011, the NPS for Electricity Transmission 2008 and s7(j) of the RMA regarding the benefits derived from renewable energy. The amendments to the principal reasons and explanation make the policies more effective by providing more context about the range of energy sources and the need to encourage renewable energy generation. 	

8.6 Urban Design

8.6.1 Objective assessment

<p>RELEVANT OBJECTIVES:</p> <ul style="list-style-type: none"> 3.7 Urban areas are well designed, sustainable and reflect local character. 3.8 Urban growth and development is well designed, reflects local character and integrates effectively with adjoining urban and rural environments

Deleting Objective 3.7 and inserting the words ‘reflects local character’ into Objective 3.8 meets the purpose of the RMA by providing for a more streamlined and cohesive document, while maintaining the intent of the original objectives.

The term ‘and development’ ensures that Objective 3.8 applies to all development, not just new growth areas.

8.6.2 Evaluation of changes to proposed provisions

Section 8.7 of the Recommendation Report recommends amendments to the urban design provisions in the PRPS.

The recommended amendments are the most appropriate way to achieve the objective relating to urban design. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions and would not simplify the provisions. 	
BENEFITS	COSTS
ENVIRONMENTAL	

<ul style="list-style-type: none"> Refining Policy 3.7.2 to focus on sensitive water management provides better direction on low impact design. Adding “and maintain” to Policy 3.7.4 helps ensure access to public spaces has ongoing support. 	<ul style="list-style-type: none"> No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
SOCIAL	
<ul style="list-style-type: none"> Deleting ‘especially the disadvantaged’ from Schedule 6, 3a) clarifies that the intent is to provide opportunities for all people. 	<ul style="list-style-type: none"> Schedule 6 provides less emphasis to the needs of the ‘disadvantaged’.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> The amendments make the policy more effective by clarifying its intent and content and simplifying it. This achieves better integrated management. Deleting Provisions 3.7.1 a) – f) and 3.8.1 i), and incorporating those matters into Schedule 6 reduces duplication and complexity in the document. This will improve ease of use. Amendments to the language of Policies 3.7.2 - 3.7.4 remove unneeded text, making them more understandable and readable. Relocating the remaining provisions to Objective 3.8 ensures that the related policies on growth and urban design are considered together. 	

8.7 Growth

8.7.1 Objective assessment

RELEVANT OBJECTIVES:

- 3.8 Urban growth and development is well designed, reflects local character and integrates effectively with adjoining urban and rural environments

Deleting Objective 3.7 and inserting the words ‘reflects local character’ into Objective 3.8 meets the purpose of the RMA by providing for a more streamlined and cohesive document, while maintaining the intent of the original objectives.

The term ‘and development’ ensures that Objective 3.8 applies to all development, not just new growth areas.

8.7.2 Evaluation of changes to proposed provisions

Section 8.8 of the Recommendation Report recommends amendments to the Growth provisions in the PRPS.

The recommended amendments are the most appropriate way to achieve the objective relating to growth. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> Increasing the timeframe in Policy 3.8.1 from 10 years to 20 years is more practical, and will result in better environmental outcomes through improved long term planning. Amending Method 4.2.4 to require structure plans for private plan changes will ensure that the environmental effects of the plan change will be considered in a comprehensive way. 	<ul style="list-style-type: none"> No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> Amending Policy 3.8.1 to include reverse sensitivity will ensure the effects of growth and development on existing activities is considered. Amending Policy 3.8.2 and deleting Schedule 8 will make territorial authorities responsible for managing their growth boundaries. This will reduce the cost and time of plan changes. 	<ul style="list-style-type: none"> Amending Method 4.2.4 may result in increased costs for private plan changes.
SOCIAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> District plans may be more susceptible to unanticipated private plan changes outside the district growth boundaries.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> The amendments to Policy 3.8.2 and deleting Schedule 8 will improve the efficiency of the PRPS because it will remove the need to undertake a change to the PRPS if that plan change is outside a growth area. The amendments remove duplication, increase clarity and improve ease of use which will improve the efficiency of the PRPS. 	

8.8 Waste, Hazardous Substances and Contamination

8.8.1 Objective assessment

RELEVANT OBJECTIVE:

- 3.9 Hazardous substances, contaminated land and waste materials do not harm human health or the quality of the environment in Otago.

Objective 3.9 is amended to include contaminated land to better reflect the content of Policy Suite 3.9.

8.8.2 Evaluation of changes to proposed provisions

Section 8.2 of the Recommendation Report recommends amendments to the waste, hazardous substances and contaminated land provisions in the PRPS.

The recommended amendments are the most appropriate way to achieve the amended objective. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> • The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions, regarding the structure and ease of use of Policy Suite 3.9. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> • An additional regional council method in Method 6 to investigate land for the purpose of identifying contaminated or potentially contaminated land will result in more contaminated land being identified and remediated. This will have positive environmental benefits. • Additions to Method 7 to develop waste management and minimisation plans, joint waste management and joint hazardous substances management strategies will result in more effective management of adverse environmental effects. 	<ul style="list-style-type: none"> • Amending Provision 3.9.2 c) to 'avoiding, remedying or mitigating adverse effects on the environment and other values' will mean that not all adverse effects on the environment will be required to be avoided. • Amending Provision 3.9.4 to require 'contaminated land' to be remediated, instead of all land will mean that not all land that is adversely affected by contaminants will be remediated.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> • Amending Policy 3.9.4 to require 'contaminated land' to be remediated, instead of all land will ensure that only land with significant adverse effects from contaminants will be remediated. This will reduce the need to unnecessarily remediate other land. 	<ul style="list-style-type: none"> • No change.

<ul style="list-style-type: none"> • Additions to Method 7 to develop waste management and minimisation plans, joint waste management and joint hazardous substances management strategies may result in a more streamlined approach. This avoids duplication of functions resulting in cost saving for councils and resource users. 	
SOCIAL	
<ul style="list-style-type: none"> • An additional regional council method to Method 6 to investigate land for the purpose of identifying contaminated or potentially contaminated land will result in more contaminated land being identified and remediated. This will have positive effects on health and safety. 	<ul style="list-style-type: none"> • No change.
CULTURAL	
<ul style="list-style-type: none"> • No change. 	<ul style="list-style-type: none"> • No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> • Separating out the policies on waste, hazardous substances and contaminated land improves the efficiency and effectiveness of Policy Suite 3.9. • A clearer differentiation of management responsibilities in the methods will result in the more efficient delivery of functions across city, district and regional councils. 	

9 Use and Enjoyment of the Environment

9.1 Public Access

9.1.1 Objective assessment

RELEVANT OBJECTIVE:

- 4.1 Public access to areas of value to the community is maintained or enhanced.

No changes are recommended to the objective.

9.1.2 Evaluation of changes to proposed provisions

Section 9.1 of the Recommendation Report recommends amendments to the public access provisions in the PRPS.

The recommended changes are the most appropriate way to achieve the public access objective. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions and would fail to give effect to the RMA and the NZCPS. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> The enhancement element of Policy 4.1.1 has been given greater weight where this provides public access to the natural environment. This aligns the policy with s6(d) of the RMA. 	<ul style="list-style-type: none"> No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> Adding d) to Policy 4.1.1 will provide lawfully established activities protection from public access where access may adversely affect their operational requirements. This aligns with Policy 19 of the NZCPS which imposes similar restrictions to protect established activities in the coastal environment. 	<ul style="list-style-type: none"> No change.
SOCIAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> Public access in limited areas may be restricted due to the operational requirements of lawfully established activities. This approach is consistent with the RMA and NZCPS.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> Public access in limited areas may be restricted due to the operational requirements of lawfully established activities. This approach is consistent with the RMA and NZCPS.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> The amendments make the policy more effective by giving effect to the RMA and NZCPS and achieving the purpose of Objective 4.1. Editorial amendments to Policy 4.1.1 and the principal reason and explanation improve its efficiency and effectiveness by simplifying and clarifying the provisions. 	

9.2 Historic Heritage

9.2.1 Objective assessment

RELEVANT OBJECTIVES:

- 4.2 Historic heritage resources are recognised and contribute to the regions character and sense of identity
- 2.1 The values of Otago's natural ~~and physical~~ resources are recognised,

maintained and enhanced

Objective 2.1 has been amended so that it applies to natural resources only.

No changes are recommended to Objective 4.2.

9.2.2 Evaluation of changes to proposed provisions

Section 9.2 of the Recommendation Report recommends amendments to the historic heritage provisions in the PRPS.

The recommended amendments are the most appropriate way to achieve the objectives relating to historic heritage. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions and would not adequately protect historic heritage from inappropriate subdivision, use and development. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> Including a broader range of historic heritage characteristics in Policy 4.2.1 on historic heritage themes contributes to the environmental, social and cultural wellbeing of the people and communities. Amendments to Schedule 7 showing that the criteria are not exhaustive will, over time, provide more consistency in historic heritage identification and assessment across the region. Amending Method 4.1.9 to require city and district councils to use heritage alert layers will assist in the early identification of areas that may contain important historic heritage. Adding significant historic heritage to a) in policies 3.5.2, 4.3.6 and 4.5.6 on nationally and regionally significant infrastructure and mining and petroleum activities recognises and protects historic heritage in accordance with s6 of the RMA. 	<ul style="list-style-type: none"> No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> Amending Method 4.1.9 to use 'advice notes' regarding accidental discovery protocols instead of 'conditions' will 	<ul style="list-style-type: none"> Adding significant historic heritage to a) in policies 3.5.2, 4.3.6 and 4.5.6 on nationally and regionally significant

<p>streamline resource consent implementation and avoid duplication of process with the accidental discovery protocols in the Heritage New Zealand Pouhere Taonga Act 2014.</p>	<p>infrastructure and mining and petroleum activities may mean that mining, petroleum and infrastructure activities will need to avoid locating in areas containing significant historic heritage if practicable.</p>
SOCIAL	
<ul style="list-style-type: none"> • Including a broader range of historic heritage characteristics in Policy 4.2.1 on historic heritage themes contributes to the environmental, social and cultural wellbeing of the people and communities. • Amending Method 4.1.9 to require city and district councils to use heritage alert layers will assist in the early identification of areas that may contain important historic heritage. • Adding significant historic heritage to a) in Policies 3.5.2, 4.3.6 and 4.5.6 on nationally and regionally significant infrastructure and mining and petroleum activities recognises and protects historic heritage in accordance with s6 of the RMA. 	<ul style="list-style-type: none"> • No change.
CULTURAL	
<ul style="list-style-type: none"> • Including a broader range of historic heritage characteristics in Policy 4.2.1 on historic heritage themes contributes to the social and cultural wellbeing of the people and communities. • Amending Method 4.1.9 to require city and district councils to use heritage alert layers will assist in the early identification of areas that may contain important historic heritage. • Adding significant historic heritage to a) in Policies 3.5.2, 4.3.6 and 4.5.6 on nationally and regionally significant infrastructure and mining and petroleum activities recognises and protects historic heritage in accordance with s6 of the RMA. 	<ul style="list-style-type: none"> • No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> • Amendments to Schedule 7 clarify that the identification of historic heritage is based on but not limited to the schedule criteria. This improves the effectiveness of the schedule by clarifying how to use it. • Ensuring that the soil mantle can be disturbed if an archaeological authority is obtained by Heritage New Zealand aligns Policy 2.1.5 with the Heritage New Zealand Pouhere Taonga Act 2014. 	

9.3 Management of Land for Economic Activities

9.3.1 Objective assessment

RELEVANT OBJECTIVE:

- 4.3 Sufficient land is managed and protected for economic production.

No amendments are recommended to the objective.

9.3.2 Evaluation of changes to proposed provisions

Section 9.3 of the Recommendation Report recommends amendments to the land use provisions in the PRPS.

The recommended amendments are the most appropriate way to achieve the objectives relating to land use. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> • The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> • No change. 	<ul style="list-style-type: none"> • No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> • Adding town centres to Policy 4.3.4 will ensure that all commercial centres are managed to support economic and social wellbeing. 	<ul style="list-style-type: none"> • No change.
SOCIAL	
<ul style="list-style-type: none"> • No change. 	<ul style="list-style-type: none"> • No change.
CULTURAL	
<ul style="list-style-type: none"> • No change. 	<ul style="list-style-type: none"> • No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> • Deleting Policy 4.3.3 improves the efficiency of the policy suite by reducing repetition. 	

9.4 Managing Land Use in Dry Catchments

9.4.1 Objective assessment

RELEVANT OBJECTIVES:

- 4.3 Sufficient land is managed and protected for economic production.

No amendments are recommended to the objective.

9.4.2 Evaluation of changes to proposed provisions

Section 9.4 of the Recommendation Report recommends amendments to the land use change in dry catchments provisions in the PRPS.

The recommended changes are the most appropriate way to achieve the economic production objective. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> • The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions regarding the uncertainty about the role of tussock in capturing and retaining precipitation. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> • No change. There is no risk from deleting tussock as a consideration in Policy 4.3.2. The protection of tussock grassland is provided for in Policies 2.1.6, 2.2.1, 2.2.2 and Schedule 5. The information and reasons to include tussock in Policy 4.3.2 are uncertain. • Amending Policy 4.3.2 to apply specifically to plantation forestry will ensure that in dry catchments, conversion to forestry will be managed to protect water quantity from significant adverse effects. 	<ul style="list-style-type: none"> • No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> • Reduced administration costs for local authorities as new land use controls regarding the conversion of tussock grassland are no longer required. 	<ul style="list-style-type: none"> • There will be additional administration costs for the regional council to control land use conversion to plantation forestry. This is in accordance with the ORC's functions and duties under RMA s30.
SOCIAL	
<ul style="list-style-type: none"> • No change. 	<ul style="list-style-type: none"> • No change.
CULTURAL	
<ul style="list-style-type: none"> • No change. 	<ul style="list-style-type: none"> • No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> • The amendments make the PRPS more efficient by deleting unnecessary provisions relating to tussock conversion, and reducing duplication within the PRPS. 	

- Editorial changes to Policy 4.3.2 improve its efficiency and effectiveness by simplifying and clarifying the provisions.

9.5 Efficient Resource Use

9.5.1 Objective assessment

RELEVANT OBJECTIVES:

- ~~4.4 Otago's communities can make the most of the natural and built resources available for use~~

Objective 4.4 and the associated issue and principal reasons and explanations have been deleted, as all the policies that were in Policy Suite 4.4 have been relocated to other sections of the PRPS. The appropriate use and development of resources is provided for throughout the PRPS. This objective is therefore unnecessary and is not required to achieve the purpose of the RMA.

9.6 Discharges

9.6.1 Objective assessment

RELEVANT OBJECTIVES:

- 4.5 Adverse effects of using and enjoying Otago's natural and ~~built environment~~ physical resources are minimised.

Objective 4.5 has been amended to align with the language in the RMA. This clarifies the purpose of the objective to more appropriately achieve the sustainable management purpose of the RMA.

9.6.2 Evaluation of changes to proposed provisions

Section 9.6 of the Recommendation Report recommends changes to the discharges provisions in the PRPS.

The recommended changes are the most appropriate way to achieve the objectives relating to discharges. The reasons for this are summarised in the table below.

OPTIONS
<ul style="list-style-type: none"> • The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions and would not be consistent with the effects-based approach generally used in the PRPS.

BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> The amendments to Policy 4.5.1 allow some objectionable discharges to occur, provided their effects can be appropriately managed. The policy required avoidance of all objectionable discharges. This change results in the potential for some adverse environmental effects to occur where they are not significant.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> The amendments to Policy 4.5.1 allow for economic activities involving objectionable discharges to be undertaken, providing they meet the requirements of the policy to avoid significant adverse effects, and avoid, remedy or mitigate other adverse effects. 	<ul style="list-style-type: none"> No change.
SOCIAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> The amendments to Policy 4.5.1 allow some objectionable discharges to occur, provided their effects can be appropriately managed. The original policy required avoidance of all objectionable discharges. This change results in the potential for some adverse environmental effects to occur where they are not significant.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> The amendments to Policy 4.5.1 allow some objectionable discharges to occur, provided their effects can be appropriately managed. The original policy required avoidance of all objectionable discharges. This change results in the potential for some adverse environmental effects to occur where they are not significant
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> The amendments to the policy increase the efficiency and effectiveness of the PRPS, by ensuring it is consistent with case law. Although there is a potential risk of increased adverse environmental, social and cultural effects, the policy seeks to manage these appropriately, which is consistent with the RMA and other policies within the PRPS. 	

9.7 Management of Adverse Effects

9.7.1 Objective assessment

RELEVANT OBJECTIVES:

- 4.5 Adverse effects of using and enjoying Otago's natural and ~~built environment~~ physical resources are minimised
- 2.2 Otago's significant and highly valued resources are identified and protected and enhanced to maintain their distinctiveness

The terms used in Objective 4.5 have been amended so that all natural and physical resources are addressed by the policy suite.

No change has been made to Objective 2.2.

9.7.2 Evaluation of changes to proposed provisions

Section 9.7 of the Recommendation Report recommends changes to the management of adverse effects provisions in the PRPS.

The recommended changes are the most appropriate way to achieve the objectives relating to management of adverse effects. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> • The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions, particularly those that requested a precautionary approach be applied to the management of natural and physical resources. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> • Adding a new policy to Policy Suite 4.5 to apply a precautionary approach where adverse effects are uncertain but potentially significant will ensure that adverse environmental effects are appropriately managed in accordance with sustainable management. • The amendments to the issue in Policy Suite 4.5 provide better recognition of how resource use may affect natural resources. 	<ul style="list-style-type: none"> • No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> • No change. 	<ul style="list-style-type: none"> • No change.
SOCIAL	
<ul style="list-style-type: none"> • The amendments to the principal 	<ul style="list-style-type: none"> • No change.

reasons and explanation in Policy Suite 4.5 provide better recognition of how resource use contributes to the wellbeing of people and communities.	
CULTURAL	
• No change.	• No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> • Providing for a precautionary approach is an effective way to manage adverse effects. • Amending 'gas' to 'petroleum' will improve the effectiveness of the provisions to be in accordance with the RMA definition of 'mineral' and the Crown Mineral Act 1991 definition of 'petroleum'. 	

9.8 Biosecurity and Pests

9.8.1 Objective assessment

RELEVANT OBJECTIVES:
<ul style="list-style-type: none"> • 4.5 Adverse effects of using and enjoying Otago's natural and built environment <u>natural and physical resources</u> are minimised • 2.2 Otago's significant and highly valued resources are identified and protected and enhanced to maintain their distinctiveness

The terms used in Objective 4.5 have been amended to clarify that all natural and physical resources are addressed by the policy suite. This is consistent with the purpose of the RMA.

No change has been made to Objective 2.2.

9.8.2 Evaluation of changes to proposed provisions

Section 9.8 of the Recommendation Report recommends changes to the biosecurity and pests provisions in the PRPS.

The recommended changes are the most appropriate way to achieve the objectives relating to biosecurity and pests. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> • The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions and would not provide adequate protection from pests. 	
BENEFITS	COSTS
ENVIRONMENTAL	
• Adding 'water quantity' and	• No change.

<p>'landscapes, seascapes and natural character' to the list of resources and values that require safeguarding from pest species in Policy 4.5.5 will ensure adverse effects on these matters are appropriately managed.</p> <ul style="list-style-type: none"> • Adding 'pest control' to Policies 2.2.2 and 2.2.15 will help achieve Objective 2.2 by protecting significant and highly valued resources from pests. • An amendment to Method 7.4 will ensure the adverse effects on outstanding natural features, landscapes, seascapes and highly valued landscapes and features are considered in the development of a Pest Management Strategy. 	
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> • No change. 	<ul style="list-style-type: none"> • No change.
SOCIAL	
<ul style="list-style-type: none"> • Adding 'Provide information and education about the control of pest species' to Method 8.1.1 will ensure appropriate support is offered to assist people and communities in the management of pests. 	<ul style="list-style-type: none"> • No change.
CULTURAL	
<ul style="list-style-type: none"> • No change. 	<ul style="list-style-type: none"> • No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> • The amendments to the pest provisions make the PRPS more efficient and effective by ensuring the adverse effects of pest species on the environment are controlled. 	

9.9 Offsetting

9.9.1 Objective assessment

RELEVANT OBJECTIVES:

- 4.5 Adverse effects of using and enjoying Otago's ~~natural and built environment~~ natural and physical resources are minimised
- 3.5 Infrastructure of ~~national and regional significance~~ is managed and developed in a sustainable way

The terms used in Objective 4.5 have been amended to clarify that all natural and physical resources are addressed by the policy suite. This is consistent with the purpose of the RMA.

The objectives for infrastructure and services and infrastructure of regional and national significance have been simplified and streamlined into one objective.

Lifeline utilities and emergency services are now addressed in the natural hazards policy suite. The focus of the objective and amended policy suite is now on all infrastructure. As this does not result in any substantive change to the content or intent of the objectives, the amended objective continues to meet the sustainable management purpose of the RMA.

9.9.2 Evaluation of changes to proposed provisions

Section 9.9 of the Recommendation Report recommends changes to the offsetting provisions in the PRPS.

The recommended changes are the most appropriate way to achieve the objectives relating to biosecurity and pests. The costs and benefits of the proposed provisions are outlined below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions and would not align with best practice guidelines for offsetting. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> The combination and amendment of Policies 4.5.7 and 4.5.8 makes offsetting an available option for all activities. Additional methods have been added to Methods 3.1 and 4.1 to ensure that the offsetting provisions are implemented in regional and district plans, resulting in better environmental outcomes. 	<ul style="list-style-type: none"> The amendments to the offsetting provisions in Policies 4.5.7 and 4.5.8 and provisions 3.5.2 e) and 4.5.6 j) are less prescriptive. This change is required because offsetting cannot be legally compelled.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> There may be some additional costs for activities that are required to offset.
SOCIAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> The amendments more effectively provide for offsetting by clarifying when and how it should be used. The requirement to offset may involve a cost for some activities; however the changes will increase consistency with best practice guidelines for offsetting and result in better environmental outcomes. 	

10 Introduction, Schedules, Roles and Responsibilities, and Appendices

10.1 Introduction

Amendments are made to the Introduction Chapter to simplify and clarify it. No assessment of these changes is required in accordance with s32AA of the RMA as the Introduction Chapter does not contain objectives, policies or methods.

10.2 Methods

10.2.1 Objective assessment

Not applicable.

10.2.2 Evaluation of changes to proposed provisions

Section 10.2 of the Recommendation Report recommends changes to the methods in the PRPS.

The recommended changes are the most appropriate way to achieve the objectives of the PRPS. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions, or improve the clarity and ease of use. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> The amendments to Method 6.3.1 ensure state of the environment monitoring and reporting is undertaken in accordance with s35 of the RMA. 	<ul style="list-style-type: none"> No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> Relocating Method 8.1.3 a) to Method 8.1.4 may reduce administration costs for some councils. 	<ul style="list-style-type: none"> No change.
SOCIAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.

EFFICIENCY & EFFECTIVENESS
<ul style="list-style-type: none"> • Removing repetitive and duplicated content and correcting errors and inaccuracies makes the methods easier to read and understand. • Cross referencing the methods to their related policies improves the efficiency of the document. • The amendment to Method 7.4 improves the alignment between the Regional Land Transport Plan and PRPS.

10.3 Anticipated Environmental Results

10.3.1 Objective assessment

Not applicable.

10.3.1 Evaluation of changes to proposed provisions

Section 10.3 of the Recommendation Report recommends changes to the Anticipated Environmental Results (AERs) in the PRPS.

The recommended changes are the most appropriate way to achieve the objectives of the PRPS. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> • The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions, or improve the clarity and ease of use. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> • Including new AERs for waste, hazardous substances and contaminated sites will clarify the environmental results anticipated from the objectives and policies. 	<ul style="list-style-type: none"> • No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> • Deleting the AER 'indicators' and 'how indicators may be measured' reduces unnecessary administration costs for regional, city and district councils and other agencies, where those indicators are not an effective way of monitoring the PRPS. 	<ul style="list-style-type: none"> • The new method in Method 6.4.1 to develop indicators and measures for AERs may increase administration costs for the ORC, but will ensure that the PRPS is efficiently and effectively monitored.
SOCIAL	
<ul style="list-style-type: none"> • No change. 	<ul style="list-style-type: none"> • No change.
CULTURAL	

• No change.	• No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> • Re-formatting the AER section of the PRPS improves ease of use. • Adding and amending the AERs so that they are consistent with the objectives and policies of the PRPS improve its effectiveness. • Removal of indicators and how they can be measured satisfies submitter concerns about the practicality and ease of use of the 'indicators' and 'how indicators may be measured', while the requirement that the regional council develop appropriate indicators and measures within 12 months will provide a more robust monitoring framework. 	

10.4 Schedule 3

10.4.1 Objective assessment

Not applicable.

10.4.2 Evaluation of changes to proposed provisions

Section 10.4 of the Recommendation Report recommends changes to Schedule 3 in the PRPS.

The recommended changes are the most appropriate way to achieve the objectives of the PRPS. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> • The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the issues raised in submissions about the purpose and usefulness of Schedule 3. 	
BENEFITS	COSTS
ENVIRONMENTAL	
• No change.	• No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
• No change.	• No change.
SOCIAL	
• No change.	• No change.
CULTURAL	
• No change.	• No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> • Deleting Schedule 3 improves the efficiency of the PRPS as it removes a schedule that does not relate to a PRPS issue. 	

10.5 Roles and Responsibilities and Glossary

10.5.1 Objective assessment

Not applicable.

10.5.2 Evaluation of changes to proposed provisions

Section 10.5 of the Recommendation Report recommends changes to the Roles and Responsibilities and Glossaries sections of the PRPS, where submissions on these matters have not been addressed elsewhere in the Recommendation Report.

The recommended changes are the most appropriate way to achieve the objectives of the PRPS. The reasons for this are summarised in the table below.

OPTIONS	
<ul style="list-style-type: none"> The options available are do nothing or amend the provisions as requested in submissions. To do nothing would not address the submissions seeking clarification of the roles and responsibilities of regional, city and district councils. 	
BENEFITS	COSTS
ENVIRONMENTAL	
<ul style="list-style-type: none"> Clarified roles and responsibilities help to ensure that responsibilities for environmental management are properly discharged. 	<ul style="list-style-type: none"> No change.
ECONOMIC, INCLUDING OPPORTUNITIES FOR ECONOMIC GROWTH AND EMPLOYMENT	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
SOCIAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
CULTURAL	
<ul style="list-style-type: none"> No change. 	<ul style="list-style-type: none"> No change.
EFFICIENCY & EFFECTIVENESS	
<ul style="list-style-type: none"> The amendments to the Roles and Responsibilities section improve the efficiency and effectiveness of the PRPS by clarifying what local authority is responsible for the matters in ss62(1)(h) and (i) of the RMA. Adding the introductory text to the Glossary clarifies that glossary terms are specific to understanding the objectives and policies in the PRPS. 	