

**1 Lynnette A. Spence**

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Support	Let common sense help you decide whatever is best to prepare for the worst, and hope for the best.	I'm thankful when you look after the environment.

**2 E Peter Walker and Mrs R L Walker**

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
170	Management of adverse effects	Policy 4.5.3 - Applying emission standards on domestic fuel burners	Did not specify	Allow wood burning fires and log burners if wood is dry.	Decreasing number of open wood burning fires or log burners in Christchurch has had no effect on the number of people being admitted to respiratory wards.

**3 George Ritchie**

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
212	Method 8 - Education and Information	Method 8.1.2 - Information from regional council - compulsory	Did not specify	Would like to see the ORC holding a "weed management" booklet, identical to "Weed Manager" by the Department of Conservation (Ref: Iris pseudacorus, Salix fragilis).	Spread of invasive species and impacts on indigenous biota.

**4 Jasmine Hunter**

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Did not specify	Start to reduce or eliminate burning of coal at Dunedin businesses or residential houses and encourage people within our communities not to burn general rubbish (including plastic items) in their household burners.	Burning coal as fuel and other toxic items affects health and survival of the environment.
165	Making the most of available resources	Policy 4.4.3 - Encouraging environmental enhancement	Did not specify	Encourage farmers and other landowners to control gorse and broom on their properties.	<ul style="list-style-type: none"> <li>• Weeds multiply and spread to neighbouring residential properties.</li> <li>• Weeds are unsightly, planting native trees would be preferable.</li> </ul>

**5 Father Andrew Lewis**

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
257	Matters beyond scope	Beyond the scope - general	Not Applicable	Manufacture user-friendly, budget priced sisal range of ropes for local and national use.	Difficulty in finding rope to raise the national flag in one piece for signalling without knots.

**6 B. F. McLachlan**

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
257	Matters beyond scope	Beyond the scope - general	Not Applicable	Fix the road at Taylors Creek Bridge, Ocean View.	There is a bump that creates noise disturbance for neighbouring property owners when vehicles go over it.

**7 G. F. Dowling**

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Not Applicable	Do not regulate good farm land into parks or non-grazable parks, denying that land for livestock and productive agriculture.	<ul style="list-style-type: none"> <li>• Land being considered is private land and regulation may impact on landowners' ability to provide for their family and livestock.</li> <li>• Normal farm management and improved practices are mainstay of farm production.</li> <li>• Efficiencies gained through stored water and partial irrigation for food production critical.</li> <li>• Use of land for livestock and productive agriculture is the backbone of rural communities and ORC rating income.</li> </ul>

**8 Alan Sandri**

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
257	Matters beyond scope	Beyond the scope - general	Not Applicable	• Stop rating people who will never use the stadium - or will never gain any benefit from it.	<ul style="list-style-type: none"> <li>• The stadium benefits only a few people at ratepayers cost.</li> <li>• Ratepayers should not be forced to pay for something they do not</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				• Adopt "user pays".	want or do not need.

### 9 Doug Browning

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
170	Management of adverse effects	Policy 4.5.3 - Applying emission standards on domestic fuel burners	Did not specify	That homes with existing multi-burners can continue to use them.	<ul style="list-style-type: none"> <li>• Homes with multi-burners will become outnumbered in the future, and voice not heard.</li> <li>• Multi-burners provide healthy warm homes in cold Dunedin winters.</li> </ul>

### 10 John Pope

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Did not specify	<ul style="list-style-type: none"> <li>• Avoid excessive dislocation of services, congestion and ensure respect and cooperation.</li> <li>• Plan to strive for a harmonious relationship between tourism, residential and commercial development.</li> </ul>	<ul style="list-style-type: none"> <li>• Enormous expansion is forecast for visitor numbers &amp; expected needs of each group (residents, tourists, business, etc) vary considerably.</li> <li>• Serious planning will assist Otago to develop, expand and retain its beauty.</li> </ul>
217	Method 11 - Advocacy and Facilitation	Method 11 - Advocacy and Facilitation	Did not specify	Consider the establishment of an expert group to reflect on these issues (services, development and tourism).	<ul style="list-style-type: none"> <li>• Enormous expansion is forecast for visitor numbers &amp; expected needs of each group (residents, tourists, business, etc) vary considerably.</li> <li>• Serious planning will assist Otago to develop, expand and retain its beauty.</li> </ul>

### 11 Mrs Joy Green

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Support	Support for heritage buildings, specifically St John's Church, Herbert.	<ul style="list-style-type: none"> <li>• Significant places don't have to be huge, and many are not in towns.</li> <li>• Oamaru has largest collection of heritage buildings for any area in the country.</li> <li>• Heritage buildings are an increasingly important resource for tourism.</li> </ul>
148	Historic heritage	Policy suite 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Support	Support for retention, access, parking and facilities might be a start.	<ul style="list-style-type: none"> <li>• Significant places don't have to be huge, and many are not in towns.</li> <li>• Oamaru has largest collection of heritage buildings for any area in the country.</li> <li>• Heritage buildings are an increasingly important resource for tourism.</li> </ul>

### 12 Christopher Mark Menzies

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
93	Climate change	Policy suite 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Amend	Remove "this figure must be taken into account when future management decisions are made"	No reason given.

### 13 Michael Harris

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Did not specify	The ORC should get with a solid programme regarding air quality in Arrowtown.	Number of exceedences of national safety standard for air quality in Arrowtown are 50 since 2012 and was worst of 38 airsheds monitored by MfE but there have been no prosecutions. Source Mountain Scene - Thursday 28 May.

### 14 John and Liz McKenzie

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Whole Regional Policy Statement (general support)	Support	In support of the Proposed RPS.	<ul style="list-style-type: none"> <li>• Encapsulates our values and aspirations.</li> <li>• Recognises and respects Otago's first people.</li> <li>• Shows a desire to ensure high quality natural resources and</li> </ul>

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					ecosystems. • Has focus on community.

### 15 Agrissentials Mosgiel

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Did not specify	<ul style="list-style-type: none"> <li>• ORC needs to introduce measures to protect this treasure (soil).</li> <li>• We need to move away from the "chemical age".</li> </ul>	<ul style="list-style-type: none"> <li>• All life is dependent upon soil, water and sunshine.</li> <li>• Soil is easily managed, given the right tools.</li> <li>• We need to look after our soils, they provide us with food and income.</li> </ul>

### 16 Anderson & Co Resource Management

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Amend	Make amendments to the Proposed RPS as required to carry out the provisions in other superior RMA documents.	Proposed RPS is not in accordance with superior documents (New Zealand Coastal Policy Statement and King Salmon Decision).
50	Highly valued natural resources - the coastal environment	Policy 2.2.8 - Identifying areas of high and outstanding natural character in the coastal environment	Amend	<ul style="list-style-type: none"> <li>• Policy 2.2.8 should say: "Identifying both areas of high and outstanding natural character in the coastal environment and areas of the coastal environment where particular activities and forms of subdivision and development are inappropriate, and may be inappropriate without the consideration of effects through a resource consent application, notice of requirement for designation or Schedule 1 of the Act process, and provide protection from inappropriate subdivision, use and development in those areas through objectives, policies and rules."</li> <li>• Make similar amendments to other parts of the Proposed RPS as required to carry out the provisions in other superior RMA documents.</li> </ul>	<ul style="list-style-type: none"> <li>• Proposed RPS is not in accordance with superior documents (New Zealand Coastal Policy Statement and King Salmon Decision).</li> <li>• Refers to New Zealand Coastal Policy Statement Policy 7, Strategic Planning.</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Make amendments to the Proposed RPS as required to carry out the provisions in other superior RMA documents.	Proposed RPS is not in accordance with superior documents (New Zealand Coastal Policy Statement policy 7 and King Salmon Decision)."

### 17 Taranaki Smith

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Support	I support these values and kaitiakitaka.	These values are about care of the environment and cultural equality.
116	Urban design	Policy suite 3.7 - Urban areas are well designed, sustainable and reflect local character	Did not specify	ORC should promote small towns such as Palmerston as places for affordable living, innovation and self sufficiency.	<ul style="list-style-type: none"> <li>• Small towns can absorb people because resources are on hand to promote sustainable living, e.g. vacant land, cheaper houses.</li> <li>• Increases in the number of residents will result in more economical use of council infrastructure from increased rates.</li> </ul>
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Support	I support extra care being taken in these areas with more work done to revegetate such areas and to slow water runoff.	These efforts will preserve and enhance dry areas as well as conserve river flows downstream.

### 18 Martin O'Brien

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Did not specify	I like rivers clean and drains cleaned out.	No reason given.
80	Natural hazard risk	Policy suite 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Did not specify	I see city [being located] up [on] higher ground from floods.	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
97	Infrastructure - general	Policy suite 3.4 - Good quality infrastructure and services meet community needs	Did not specify	<ul style="list-style-type: none"> <li>• Better and wider roads, including in Central Otago, and from Lawrence to Alexandra and Queenstown.</li> <li>• I would like a train link from Dunedin City to Airport, and buses in the next few years.</li> <li>• New bus services from Roslyn to Mornington on Highgate, into town, to Forsyth Barr Stadium, and to Dunedin Airport.</li> <li>• Cheap bus rides from and to Dunedin.</li> <li>• Help people to get on buses all around Dunedin, Otago and Southland.</li> <li>• Bigger planes like the A380 coming in to Dunedin and Invercargill Airports, Queenstown is too small for bigger planes.</li> <li>• New airport at Alexandra.</li> </ul>	No reason given.
154	Land management for economic production	Policy suite 4.3 - Sufficient land is managed and protected for economic production	Did not specify	Would like Dunedin to grow with new hotels and motels, including at the airport	No reason given.

### 19 Bruce Lambie

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Support	Need to protect wetlands.	They are very important in water conservation and water retention.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Support	<ul style="list-style-type: none"> <li>• Need to significantly reduce rural burn offs by farmers.</li> <li>• Ban or at a minimum severely restrict burning off by rural landowners.</li> </ul>	Burnoffs happen in winter and spring through much of Otago, are frequently massive, and have a very detrimental effect on air quality and the environment.
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Support	Need to protect tussock grasslands.	<ul style="list-style-type: none"> <li>• These are iconic to Otago.</li> <li>• They are a very important factor in water conservation as they significantly help in water retention.</li> </ul>

### 20 Dr Mike Jennings

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Overall approach	Whole Regional Policy Statement (general opposition)	Oppose	The ORC publicly withdraws this document, and then formally re-writes it with its true agenda included in an intelligible format.	The Proposed RPS appears to set in place a very loose framework to engage in a tacit agreement with ratepayers, whilst being dangerously short on specifics, such as which Iwi partners are involved?
7	Chapter B1 - Kai Tahu values	Chapter B1 - general requests	Oppose	RPS should not be addressing specific treaty issues	<ul style="list-style-type: none"> <li>• Specific treaty issues are totally and fully outside the Mandate of the ORC, both legally and morally to address. It requires further extensive public submissions before the ORC should even be allowed to address these publicly with regard to resources.</li> <li>• As some European New Zealanders are descendants of the British, the original treaty parties, their claims to resources as equal partners of the treaty are not at all established in this document.</li> <li>• Affording privileges to one partner through ORC submission processes, based purely upon race alone, sets a dangerous precedence, and must be resolved urgently, for the benefit of all ratepayers.</li> </ul>
154	Land management for economic production	Policy suite 4.3 - Sufficient land is managed and protected for economic production	Amend	Restoration of full mineral prospecting and mining rights under the Treaty must be acknowledged and recognised by the ORC for all treaty partners.	<ul style="list-style-type: none"> <li>• A case in point to loss of access to resources by this party [European New Zealanders descendants of British] is the 'miners right'. This access right to minerals has been removed from this population, without consultation or consent, and represents a loss of privilege and cultural mana under the Treaty.</li> <li>• The ORC has already moved into making substantial concessions</li> </ul>

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					historically in public agreements with recreational suction dredgers in Otago. This represents a cultural activity, which is presently under threat.
257	Matters beyond scope	Beyond the scope - general	Amend	Include a review of ratepayers mineral prospecting rights within Otago in this or the next public submission.	<ul style="list-style-type: none"> <li>• A case in point to loss of access to resources by this party [European New Zealanders descendants of British] is the 'miners right'. This access right to minerals has been removed from this population, without consultation or consent, and represents a loss of privilege and cultural mana under the Treaty.</li> <li>• The ORC has already moved into making substantial concessions historically in public agreements with recreational suction dredgers in Otago. This represents a cultural activity, which is presently under threat.</li> </ul>

### 21 Annabeth Cohen

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	<ul style="list-style-type: none"> <li>• Would like the ORC mandate that city and regional buses have their exhaust pipes on the top of the bus rather than the bottom.</li> <li>• Would like regulations put on exhaust that Greg's factory puts out in Dunedin (particularly on the coffee smelling exhaust).</li> <li>• Would like the ORC eliminate Coal Fired Power in Otago.</li> <li>• Would like the levels of toxicity of Greg's emissions assessed, monitored and reported on to the public.</li> </ul>	<ul style="list-style-type: none"> <li>• Exhaust fumes from buses are a health hazards for cyclists and pedestrians.</li> <li>• Greg's factory exhaust puts out a terrible coffee smell.</li> <li>• It is at the very least odour pollution and should be taken seriously.</li> <li>• Burning coal is dangerous to the people's health as well as dangerous for the future of the planet. Coal is the dirtiest and most unhealthy of all the fossil fuels.</li> </ul>
108	Energy	Policy suite 3.6 - Energy supplies to Otago's communities are secure and sustainable	Did not specify	<ul style="list-style-type: none"> <li>• ORC makes a plan to transition off of coal and onto renewables.</li> </ul>	<ul style="list-style-type: none"> <li>• Burning coal is dangerous to the people's health as well as dangerous for the future of the planet. Coal is the dirtiest and most unhealthy of all the fossil fuels.</li> <li>• Better than transitioning to gas, as the common argument would offer.</li> </ul>

### 22 E. Loehr-Haenig, J. D. Nieveen

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
170	Management of adverse effects	Policy 4.5.3 - Applying emission standards on domestic fuel burners	Amend	<ul style="list-style-type: none"> <li>• Coal fires should be outlawed for all, starting immediately.</li> <li>• New houses being built should not be allowed to install coal heating.</li> <li>• Existing houses should be made to replace coal fires within a specified time frame.</li> </ul>	<ul style="list-style-type: none"> <li>• On cold days, the smell of coal fires in town is disgusting and damages our health while new houses are still being built with coal heating (e.g. Waiholo).</li> </ul>

### 23 G.L. Steel

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
207	Method 7 - Strategies and Plans (non-RMA)	Method 7.4 - Pest management strategy	Did not specify	Monitor and manage Old Man's Beard along the Clutha from Beaumont to Balclutha.	<ul style="list-style-type: none"> <li>• Concerned about the spread of Old Man's Beard from the banks of the Clutha river further up the blue mountain.</li> <li>• Does not mind it choking out willows, but wonders what it could do on the mountain.</li> <li>• If Council can monitor the weed on private land in Dunedin it should address the situation along the Clutha.</li> </ul>

### 24 Karin Bowen

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Add: "continued oversight of water quality throughout Otago with initiatives to maintain	Community concern that land use changes result in decrease in quality of water in rivers and lakes. Oversight and management

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				current water quality levels."	essential to prevent deterioration.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Add: "Continued efforts will be made to improve air quality in areas where air quality is poor."	Significant investment has been made by ORC and homeowners to improve airshed 1 areas with little improvement. Further effort must be made to get a return on that investment and improve air quality.

### 25 Glen Callanan

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
257	Matters beyond scope	Beyond the scope - general	Amend	<ul style="list-style-type: none"> <li>Invercargill &amp; Dunedin hospitals to stay, the rest to be scrapped or downsized.</li> <li>Central Otago rowing club moved to be at Dairy Creek</li> <li>CODC to consider a starting point for the Clyde Community Plan</li> </ul>	None given.

### 26 Willowridge Developments Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
115	Objectives on resilience, health and safety	Objective 3.7 - Urban areas are well designed, sustainable and reflect local character	Oppose	<ul style="list-style-type: none"> <li>Delete "and reflect local character" from objective 3.7 or,</li> <li>Replace "reflect" with "considerate of", or words of like effect</li> </ul>	the use of the word 'reflect' does not provide for new and innovative layouts and styles of development.
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete Schedule 6	Schedule 6 is too detailed and is beyond the remit of a regional council. The detail is more appropriately dealt with at a district level and is likely to duplicate district plan content. Some of the points are ambiguous, such as 1g) impact of design on people's health, and 3a) to provide opportunities for all, especially the disadvantaged.
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Oppose	Delete Policy 3.7.3(b) or generalised i.e. 'insulating to a high standard'	Policy 3.7.3(b) encourages insulation greater than required under building legislation. This may create additional cost and cause confusion.
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Oppose	Delete Policy 4.3.4	Does not provide for other commercial areas such as Andersons Bay road in Dunedin or Three Parks in Wanaka. This policy could be contradictory to district plans and could stifle commercial development in urban areas.

### 27 Warwick Hobbs

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Did not specify	Acknowledgement and disclosure what sustainability means to the ORC	No apparent relentless pursuit of sustainable practice.
207	Method 7 - Strategies and Plans (non-RMA)	Method 7.4 - Pest management strategy	Did not specify	To provide the public with a definitive control for Lagarosyphon which is safe. Invite public opinions to facilitate other options.	Lagarosyphon management in Lake Dunstan and other lakes etc.

### 28 Clutha District Council

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Support	No change.	The objectives and policies for this key outcome currently reflect CDC practices.
12	Principles of Te Tiriti of Waitangi	Policy suite 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Support	No change.	The objectives and policies for this key outcome currently reflect CDC practices.
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are	Support	No change.	The objectives and policies for this key outcome currently reflect CDC practices.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		sustained			
17	Kai Tahu values, rights, interests and customary resources	Policy suite 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Support	No change.	The objectives and policies for this key outcome currently reflect CDC practices.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Clear relationship between policy and methods to identify who is responsible for implementing this policy.	There are no corresponding methods for this policy, other than Method 3.1.4, which does not address the policy. Method 4.1 is generic to all policies, so it is not clear if this is a regional or district council function (or both).
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Remove items a), b) and c) as these are repeated in Schedule 4. This policy could be reworded similar to policy 2.2.3	Repetition of material is not required.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Amend	If Policies 2.2.5 & 2.2.6 are retained, use different schedules for categorising the different landscapes (outstanding vs. special amenity).	It will achieve clarity of the different characteristics associated with each type of landscapes.
39	Natural resource value management - general	Policy 2.1.8 - Recognising the values of natural character in the coastal environment	Support	No change, other than addition of a reference to this Policy in Method 4.	Coastal Councils are working with the ORC to recognise these values.
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Support	No change.	Reflects current approach of Clutha District Council.
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend policy by replacing "managing" with "protecting".	This better reflects the intent of the policy, the purpose of the RMA and Council's approach to this issue.
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend policy by replacing "managing" with "protecting".	This better reflects the intent of the policy, the purpose of the RMA and Council's approach to this issue.
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Oppose	<ul style="list-style-type: none"> <li>Remove policy and associated reference in Method 4.2.2</li> <li>Alternatively, if the policy is to remain, amend method by changing "will" to "may" so implementation becomes optional.</li> </ul>	<ul style="list-style-type: none"> <li>The policy exceeds the requirements of the RMA. CDC has undertaken a landscape study and consultation with landowners will be based on identified outstanding landscapes.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Oppose	<ul style="list-style-type: none"> <li>Remove policy and associated reference in Method 4.2.2.</li> <li>Alternatively, if the policy is to be retained: <ul style="list-style-type: none"> <li>amend method by changing "will" to "may" so implementation becomes optional.</li> <li>use a different schedule to identify features associated with special amenity landscapes to achieve the clarity of different characteristics associated with each.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The policy exceeds the requirements of the RMA. CDC has undertaken a landscape study and consultation with landowners will be based on identified outstanding landscapes.</li> </ul>
49	Highly valued natural resources - the coastal environment	Policy 2.2.7 - Identifying the landward extent of the coastal environment	Support	No change, other than to include reference to this policy in Method 4.2.2.	These policies reflect the New Zealand Coastal Policy Statement and Otago's coastal councils are working with the ORC to achieve them.
50	Highly valued natural resources - the coastal environment	Policy 2.2.8 - Identifying areas of high and outstanding natural character in the coastal environment	Support	No change, other than to include reference to this policy in Method 4.2.2.	These policies reflect the New Zealand Coastal Policy Statement and Otago's coastal councils are working with the ORC to achieve them.
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Support	No change, other than to include reference to this policy in Method 4.2.2.	These policies reflect the New Zealand Coastal Policy Statement and Otago's coastal councils are working with the ORC to achieve them.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	<ul style="list-style-type: none"> <li>Set out how Policy 2.2.15 will be implemented in the methods.</li> <li>Policy 2.2.15 d) is supported.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 2.2.15 is dependent on ORC undertaking research to inform Policy 2.2.14. It is not clear how Policy 2.2.15 will be implemented by district councils in the absence of this research.</li> </ul>

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					<ul style="list-style-type: none"> <li>Policy 2.2.15 d) recognises the existing situation of some urban areas and the constraints to their further expansion.</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Reduce and condense down to key issues if at all needed.	Policies are repetitive and do not greatly assist in resource management. Many of the matters are addressed through other policies and are not required.
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Oppose	Reduce and condense down to key issues if at all needed.	Policies are repetitive and do not greatly assist in resource management. Many of the matters are addressed through other policies and are not required.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Oppose	<ul style="list-style-type: none"> <li>Remove objective 3.1</li> <li>Alternatively, if to be retained, substantially reword to focus on the key resilience issues such as greater self-sufficiency.</li> </ul>	<ul style="list-style-type: none"> <li>The matters identified are commendable, but too broad and open to interpretation and challenge - for example does the availability of natural resources include fossil fuels?</li> <li>Technological risks are often unknown.</li> </ul>
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Oppose	<ul style="list-style-type: none"> <li>Remove policy 3.1.1.</li> <li>Alternatively, if retained, substantially reword to focus on the key resilience issues such as greater self-sufficiency.</li> </ul>	<ul style="list-style-type: none"> <li>The matters identified are commendable, but too broad and open to interpretation and challenge - for example does the availability of natural resources include fossil fuels?</li> <li>Technological risks are often unknown.</li> </ul>
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Consider changing 'minimised' to 'managed' or equivalent.	The word 'minimised' does not align well with supporting policies.
82	Natural hazard risk	Policy 3.2.2 - Assessing natural hazard likelihood	Did not specify	Ensure timeframe of 100 years is appropriate for all hazards.	Timeframe may not be appropriate for all hazards, e.g. seismic related hazards.
93	Climate change	Policy suite 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Amend	Address policy gap in policy suite to achieve Objective 3.3.	Supporting policies do not address the preparedness element of Objective 3.3.
95	Climate change	Policy 3.3.2 - Adapting to, or mitigating the effects of, climate change	Amend	Consider rewording 3.3.2.c) to address potential adverse effects of carbon sequestration from pest species, such as wilding pines.	Need to address potential conflict with other policies e.g. Policy 2.1.6.
96	Objectives on resilience, health and safety	Objective 3.4 - Good quality infrastructure and services meet community needs	Support	No change.	Note that Long Term Plans also play a significant role in achieving this policy.
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Support	No change.	Council provides much of the infrastructure relied upon by communities
107	Objectives on resilience, health and safety	Objective 3.6 - Energy supplies to Otago's communities are secure and sustainable	Support	No change.	This objective is critical for the functioning of the region.
109	Energy	Policy 3.6.1 - Using existing renewable electricity generation structures and facilities	Support	Support in principle, but check the need for this policy.	<ul style="list-style-type: none"> <li>Given the current disaggregated electricity supply market this policy is not achievable.</li> <li>While commendable, most existing facilities will be operating at or near capacity.</li> <li>Intent may be misused.</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Support	No change.	This policy contributes to achieving other policies around resilience and reducing demand for fossil fuels.
114	Energy	Policy 3.6.6 - Reducing long term demand for fossil fuels	Amend	Amend part b) ii. to include "where available" after "public transport".	Not all urban areas are serviced by public transport and this would be consistent with b) i.
115	Objectives on resilience, health and safety	Objective 3.7 - Urban areas are well designed, sustainable and reflect local character	Support	No change.	Council supports this Objective as it helps achieve other outcomes.
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	<ul style="list-style-type: none"> <li>Remove items a) to f)</li> <li>Could reword in manner similar to Policy 2.2.3.</li> </ul>	<ul style="list-style-type: none"> <li>Items a) to f) as these are repeated in Schedule 6.</li> <li>Repetition of material is not required.</li> </ul>
119	Urban design	Policy 3.7.2 - Encouraging use of	Support	Conditional support for Policy 3.7.2 based on	<ul style="list-style-type: none"> <li>Conditional support is based on amendment of Policy 3.7.1 as</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		low impact design techniques		amendment of Policy 3.7.1 as requested.	requested. <ul style="list-style-type: none"> <li>Policy 3.7.2 b) does not align with of Policy 3.7.1 c) and offers a lower threshold of hazard treatment.</li> </ul>
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend policy 3.7.3 as follows: "Designing for warmer <u>and more energy efficient</u> buildings"	<ul style="list-style-type: none"> <li>Strengthen to also encourage the use of active solar energy, such as solar panels or solar hot water heating.</li> <li>CDC's Building Department has noticed an increase in the use of solar systems, particularly in more remote areas where reticulated electricity costs are high.</li> <li>Encouraging domestic solar energy use can increase household resilience in times of power outages, reduce the reliance on combustion based heating that contribute to lower air quality, and can reduce demand for power nationally</li> </ul>
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Amend	Relook at wording around 'integrates effectively'.	Urban growth occurs in a variety of ways and it can be argued that rural residential areas act as a good buffer between urban and rural zones, whereas it can also be argued that a clean edge of urban bordering rural land is also appropriate.
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	<ul style="list-style-type: none"> <li>Amend Policy 3.8.1 b) ii as follows – "Avoid, <u>where possible</u>, additional costs that arise from unplanned infrastructure expansion"</li> <li>Delete Policy 3.8.1 e) "Ensuring efficient use of land"</li> </ul>	<ul style="list-style-type: none"> <li>It is not always possible to avoid the costs of unplanned infrastructure expansion, especially as a result of a private plan changes.</li> <li>Policy 3.8.1 e) is immeasurable and does not assist the policy. Furthermore, it cuts into private property rights and reduces choice.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Amend	Delete reference to 'Schedule 8' and Schedule 8 itself.	<ul style="list-style-type: none"> <li>Having an unpopulated Schedule 8 doesn't create certainty, so no need to include it.</li> <li>Schedule 8 can only be populated by way of a plan change, which is cumbersome and can create duplication of processes for both councils involved, as well as parties to the processes.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Remove Schedule 8	<ul style="list-style-type: none"> <li>Having an unpopulated Schedule 8 doesn't create certainty, so no need to include it.</li> <li>Schedule 8 can only be populated by way of a plan change, which is cumbersome and can create duplication of processes for both councils involved, as well as parties to the processes.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<p>Reword Policy 3.8.3 as follows:</p> <ul style="list-style-type: none"> <li>b) iii "reverse sensitivity effects on rural productive activities can be avoided <u>where possible</u>; and..."</li> <li>Remove d) "Avoid creating competing demand for water or other resources."</li> </ul>	<ul style="list-style-type: none"> <li>Unsure how Policy 3.8.3 b) iii can be achieved as reverse sensitivity is difficult to manage in all cases.</li> <li>Policy 3.8.3 d) is ambitious as demand for resources is often competitive and cannot always be avoided.</li> </ul>
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Support	No change.	CDC supports this Objective as it has important consequences for the District.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Remove reference to "the environment" from the policy.	<ul style="list-style-type: none"> <li>The policy goes beyond the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health in that it also seeks to protect the environment.</li> <li>The Council is unclear of the implications of this, both for its activities and for those of ratepayers.</li> </ul>
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Oppose	Remove policy.	<ul style="list-style-type: none"> <li>CDC considers this policy is contrary to other policies, such as those that are supporting industrial activity that has the ability to contaminate.</li> <li>It is also not included in the methods and does not correlate well to method 4.1.7</li> </ul>
144	Objectives on use and enjoyment of natural and built environment	Objective 4.1 - Public access to areas of value to the community is maintained or enhanced	Support	No change.	CDC supports this Objective and provides for it in the current District Plan.

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146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Support	No change.	CDC supports this Objective and provides for it in the current District Plan.
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Support	No change.	
149	Historic heritage	Policy 4.2.1 - Recognising heritage themes	Amend	Amend to include other heritage elements.	CDC notes this is only a snapshot of some heritage elements that was provided by Heritage NZ. The Council feels that many other important elements are excluded and have suggested these previously.
150	Historic heritage	Policy 4.2.2 - Identifying historic heritage	Amend	<ul style="list-style-type: none"> <li>Remove items a) - c) as these are repeated in Schedule 7 (with additions).</li> <li>Could be reworded in manner similar to Policy 2.2.3.</li> </ul>	Repetition of material not required.
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for economic production	Amend	Amend objective to better reflect its intent, such as "Land reliant on natural resources is managed to provide for the sustainable use of these resources."	The Council struggles with the wording of this objective as its current wording is overly restrictive.
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Oppose	Remove policy.	<ul style="list-style-type: none"> <li>The matters addressed in the policy are largely covered elsewhere.</li> <li>The policy is not needed in a RPS as it is a district plan matter.</li> </ul>
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Support	No change.	This policy correctly deals with a natural resource issue and land use change that may affect it.
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Oppose	Remove policy.	<ul style="list-style-type: none"> <li>The policy states the obvious and does not add any value to the RPS or for city and district councils that can manage this issue.</li> <li>It is not needed in a RPS as it is a city/district plan matter.</li> </ul>
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Oppose	Remove policy.	<ul style="list-style-type: none"> <li>The policy is not needed in a RPS as it is a city/district plan matter.</li> <li>Part d) does not fit within the scope of the policy.</li> </ul>
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Oppose	Remove policy.	The policy is not needed in a RPS as it is a city/district plan matter.
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Support	No change.	This policy correctly deals with a natural resource issue, the sensitivities around it and land use change that may affect it.
161	Objectives on use and enjoyment of natural and built environment	Objective 4.4 - Otago's communities can make the most of the natural and built resources available for use	Amend	Amend to better align with the supporting policies, such as "Otago's communities recognise the limited nature of the resources and seek to improve the efficiency of use"	The Council generally supports the intent of the objective, however the wording of it needs to better reflect the intent as detailed in the policies.
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	Amend "b) Requiring the development or upgrade of infrastructure that increases use efficiency <u>where the use can be managed</u> "	<ul style="list-style-type: none"> <li>Council is concerned that the end use of water from its supplies is largely outside of its control.</li> <li>While it can advocate for greater water use efficiency, it is limited under current legislation in how it can control this.</li> </ul>
164	Making the most of available resources	Policy 4.4.2 - Encouraging waste minimisation	Support	Support and potentially strengthen policy to include greater requirements on higher waste generators.	The Council supports the hierarchy approach adopted by the policy, however it may better achieve waste minimisation if larger generators of waste are required to follow these steps.
165	Making the most of available resources	Policy 4.4.3 - Encouraging environmental enhancement	Support	Support and potentially strengthen to offer incentives where enhancement is undertaken, such as rates remission (a current tool available).	<ul style="list-style-type: none"> <li>The Council has a contestable biodiversity fund in place that partially achieves this policy.</li> <li>Environmental enhancement is required across many natural systems and should be elevated by including incentives to carry out enhancement.</li> </ul>
166	Objectives on use and enjoyment of natural and built environment	Objective 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Support	No change.	The objective captures an important issue that Council supports.
171	Management of adverse effects	Policy 4.5.4 - Minimising soil erosion	Support	Support and potentially strengthen to include soil degradation and loss from intensive	<ul style="list-style-type: none"> <li>Council is aware of intensive grazing practices that lead to soil degradation and ultimately soils loss from runoff.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				stocking	<ul style="list-style-type: none"> <li>The policy could include provision for buffers or other mechanisms to reduce the impact of this.</li> </ul>
172	Management of adverse effects	Policy 4.5.5 - Controlling the introduction and spread of pest plants and animals	Support	No change.	The Council supports the intent of this policy and is aware of the threats pest species present to the district.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	<ul style="list-style-type: none"> <li>Remove part a) from the policy as it is repeated in Policy 4.3.6 a).</li> <li>A subsequent change to part b) is also required or it can be removed.</li> </ul>	The policy repeats an earlier policy in part.
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend policy, such as: "a) The activities causing those effects have a functional necessity to locate in <u>areas of significant indigenous vegetation and significant habitats of indigenous fauna</u> ; and b) Those effects cannot be avoided; and c) Those effects do not <u>compromise the rarity or distinctiveness of the indigenous biodiversity as set out in Schedule 5.</u> "	<ul style="list-style-type: none"> <li>Council supports the concept of offsetting.</li> <li>The policy should pick up the key aspects of why offsetting may not be appropriate.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Amend policy, such as: "b) The offset is undertaken <u>within the same ecological district as the location of the loss, or within the next ecological district.</u> " "d) The <u>ecological offset is made permanent, or for fauna, lasts as long as the impact of the loss.</u> "	<ul style="list-style-type: none"> <li>The Council supports the concept of offsetting, but the policy should be reworked to better capture the value of offsetting so that it achieves the desired outcome.</li> <li>Council would prefer to see offsetting occur in the same ecological district if possible and with greater permanence for indigenous flora.</li> </ul>
177	Roles and responsibilities	Roles and responsibilities	Amend	Delete roles and responsibilities section	This merely repeats the RMA and is not needed. If the RMA changes, then this may become out of date.
178	Methods	Methods - general	Amend	Methods need to be relooked at once the objectives and policies are redone as there are many gaps.	As noted in parts of our submission, there are some references in Methods 4 and 7 in particular that are missing.
192	Method 4 - City and District Plans	Method 4 - City and District Plans	Amend	Method 4 should refer to both: <ul style="list-style-type: none"> <li>Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes, and</li> <li>Policy 2.1.8 Recognising the values of natural character in the coastal environment</li> </ul>	Coastal Councils are working with the ORC to recognise these values.
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	<ul style="list-style-type: none"> <li>Remove reference to Policy 2.2.5 from Method 4.2.2 if Policies 2.2.5 and 2.2.6 are deleted.</li> <li>Alternatively, if the policies are to remain then make the implementation of them optional through "may" rather than "will".</li> </ul>	Policies 2.2.5 and 2.2.6 exceed the requirements of the RMA. However if they are to be retained CDC seek that their implementation becomes optional.
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend Method 4.2.2 to give reference to Policies 2.2.7, 2.2.8 and 2.2.9.	These policies reflect the New Zealand Coastal Policy Statement and Otago's coastal councils are working with the ORC to achieve them.
197	Method 6 - Research, Monitoring and Reporting	Method 6 - Research, Monitoring and Reporting	Amend	Method 6 needs to be updated in relation to the Anticipated Environmental Results and Monitoring Programme.	<ul style="list-style-type: none"> <li>It is not apparent how this will be done and by whom. For example, what will be the measure of quality?</li> <li>Need to clarify what the indicator values are and who will be monitoring these, in particular:                AER 2.1 – Regular monitoring of the state (extent and quality) of outstanding and highly significant resources                AER 2.3 – Regular monitoring of natural character indicator values for Otago's coastal environment.                AER 2.4 – Regular monitoring of soil health indicators and erosion measures.                AER 2.5 – All three indicators.</li> </ul>
203	Method 7 - Strategies and Plans	Method 7 - Strategies and Plans	Amend	• Amend method 7 to refer to Policy suite 3.9.1	Method 7 is silent on how these policies will be implemented, for

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	(non-RMA)	(non-RMA)		to 3.9.7. • Include Regional Plan Waste as a method.	example through a Regional Waste Plan.
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Amend	Include a Biodiversity Strategy under Method 7 to give effect to Policy 2.1.6	The Council supports Policy 2.1.6's intent, but seeks that the ORC develop a biodiversity strategy for the region and take a lead role in this area. Councils have put resources into biodiversity protection and enhancement, however, local resources are limited and a more regional approach might see better integration towards improving the management of the region's biodiversity.
269	Objectives on high quality natural resources	Introduction to Objective 2.1	Amend	The wording beneath the objective needs amending to better reflect the intent of the objective, rather than outlining some examples of value conflicts.	The wording beneath the objective does not add any clarification; rather it just provides example statements, which are given. There needs to be clear reasons why values need to be recognised, maintained and enhanced (where possible).

### 29 Egg Producers Federation of New Zealand

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	An additional sub-clause be added to Policy 2.1.1 : " <u>Policy 2.1.1g) - Ensure that the reasonable needs of existing water users for drinking water (including stock drinking water) can be met.</u> "	<ul style="list-style-type: none"> <li>• Supports the recognition that Otago's economy depends on its natural resources, such as water for food production.</li> <li>• Agrees with the intention of Policy 2.1.1.</li> <li>• Stock drinking water is not specifically provided for under this policy.</li> <li>• The availability of water is a fundamental issue for rural production activities.</li> <li>• Stock drinking water is explicitly provided for under s14(3)(b) of the RMA</li> </ul>
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Add subclause to Policy 2.1.4: " <u>d) - Enable rural production activities in appropriate locations by allowing for minor and localised degradation of amenity.</u> "	<ul style="list-style-type: none"> <li>• Supports the recognition that there are a range of air quality values which need to be managed.</li> <li>• Policy 2.1.4(c) is too broad and does not recognise that a range of amenity values exist.</li> <li>• Air discharge affecting amenity is typical of rural activities and a different level of amenity is anticipated and appropriate in rural environments.</li> <li>• Important to recognise that rural production activities, such as intensive poultry farming, have the potential to generate air discharge effects such as odour and dust but these are generally acceptable in a rural environment.</li> </ul>
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Replace "soil" by "land" throughout the Policy	<ul style="list-style-type: none"> <li>• Agrees with the intention of managing, maintaining and retaining soils, and of identifying and managing highly valued soil resources, as soil is a finite resource.</li> <li>• However, the productive capacity of rural land is not solely based on soil fertility and also depends on soil structure, water availability, topography and climate as defined in the Land Use Capability Survey Handbook prepared by Landcare New Zealand (2009).</li> <li>• Rural production includes non-soil based activities, (e.g. intensive poultry farming and horticulture activities), which may use sheds or greenhouses, which need well drained, flat rural land in order to operate, but do not solely rely on soil fertility.</li> <li>• It is important to protect the overall land resource including the soil and land with other characteristics that make it suitable for a range of rural production activities.</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	Replace "soil" by "land" throughout the Policy	<ul style="list-style-type: none"> <li>• Agrees with the intention of managing, maintaining and retaining soils, and of identifying and managing highly valued soil resources, as soil is a finite resource.</li> <li>• However, the productive capacity of rural land is not solely based on soil fertility and also depends on soil structure, water availability, topography and climate as defined in the Land Use Capability Survey Handbook prepared by Landcare New Zealand (2009).</li> </ul>

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					<ul style="list-style-type: none"> <li>Rural production includes non-soil based activities, (e.g. intensive poultry farming and horticulture activities), which may use sheds or greenhouses, which need well drained, flat rural land in order to operate, but do not solely rely on soil fertility.</li> <li>It is important to protect the overall land resource including the soil and land with other characteristics that make it suitable for a range of rural production activities.</li> </ul>
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Replace "soil" by "land" throughout the Policy	<ul style="list-style-type: none"> <li>Agrees with the intention of managing, maintaining and retaining soils, and of identifying and managing highly valued soil resources, as soil is a finite resource.</li> <li>However, the productive capacity of rural land is not solely based on soil fertility and also depends on soil structure, water availability, topography and climate as defined in the Land Use Capability Survey Handbook prepared by Landcare New Zealand (2009).</li> <li>Rural production includes non-soil based activities, (e.g. intensive poultry farming and horticulture activities), which may use sheds or greenhouses, which need well drained, flat rural land in order to operate, but do not solely rely on soil fertility.</li> <li>It is important to protect the overall land resource including the soil and land with other characteristics that make it suitable for a range of rural production activities.</li> </ul>
95	Climate change	Policy 3.3.2 - Adapting to, or mitigating the effects of, climate change	Amend	Add a sub-clause to Policy 3.3.2 as follows: <u>Policy 3.3.2.d) Acknowledging that some activities are more resilient and able to adapt to the effects of climate change.</u>	<ul style="list-style-type: none"> <li>Policies do not reflect Council's acknowledgment that the effects of climate change and sea level rise are not uniform and will result in different social and environmental costs for those activities which are affected. Policies to strengthen these intentions are necessary.</li> <li>Non-habitable buildings / activities have different resilience levels in comparison to more vulnerable activities such as habitable buildings and can therefore adapt to these changes.</li> <li>Policies which encourage and enable the future establishment and expansion of non-residential activities should be acknowledged as it will continue to contribute to the region's economy with low social and environmental effects.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Replace "soil" by "land" throughout the Policy	<ul style="list-style-type: none"> <li>Agrees with the intention of managing, maintaining and retaining soils, and of identifying and managing highly valued soil resources, as soil is a finite resource.</li> <li>However, the productive capacity of rural land is not solely based on soil fertility and also depends on soil structure, water availability, topography and climate as defined in the Land Use Capability Survey Handbook prepared by Landcare New Zealand (2009).</li> <li>Rural production includes non-soil based activities, (e.g. intensive poultry farming and horticulture activities), which may use sheds or greenhouses, which need well drained, flat rural land in order to operate, but do not solely rely on soil fertility.</li> <li>It is important to protect the overall land resource including the soil and land with other characteristics that make it suitable for a range of rural production activities.</li> </ul>
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for economic production	Support	Support	Agrees with the aim of Objective 4.3 to ensure that land is managed and protected for economic production.
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Support	Add the following sub-clause to Policy 4.3.1: " <u>f) Restricting new development to appropriate locations to minimise conflict between incompatible land uses.</u> "	<ul style="list-style-type: none"> <li>Supports Policy 4.3.1 which restricts the establishment of activities that may lead to reverse sensitivity.</li> <li>Lawfully established rural productive activities, such as poultry farms, are often threatened by the encroachment of more sensitive activities, such as dwellings and places of assembly, which have the ability to hamper or curtail its operation.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Replace "soil" by "land" throughout the Policy	<ul style="list-style-type: none"> <li>• Agrees with the intention of managing, maintaining and retaining soils, and of identifying and managing highly valued soil resources, as soil is a finite resource.</li> <li>• However, the productive capacity of rural land is not solely based on soil fertility and also depends on soil structure, water availability, topography and climate as defined in the Land Use Capability Survey Handbook prepared by Landcare New Zealand (2009).</li> <li>• Rural production includes non-soil based activities, (e.g. intensive poultry farming and horticulture activities), which may use sheds or greenhouses, which need well drained, flat rural land in order to operate, but do not solely rely on soil fertility.</li> <li>• It is important to protect the overall land resource including the soil and land with other characteristics that make it suitable for a range of rural production activities.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Replace "soil" by "land" in the Method	<ul style="list-style-type: none"> <li>• Agrees with the intention of managing, maintaining and retaining soils, and of identifying and managing highly valued soil resources, as soil is a finite resource.</li> <li>• However, the productive capacity of rural land is not solely based on soil fertility and also depends on soil structure, water availability, topography and climate as defined in the Land Use Capability Survey Handbook prepared by Landcare New Zealand (2009).</li> <li>• Rural production includes non-soil based activities, (e.g. intensive poultry farming and horticulture activities), which may use sheds or greenhouses, which need well drained, flat rural land in order to operate, but do not solely rely on soil fertility.</li> <li>• It is important to protect the overall land resource including the soil and land with other characteristics that make it suitable for a range of rural production activities.</li> </ul>
232	Anticipated Environmental Results	AER 2.4 - The quality of Otago's soils is maintained or enhanced	Amend	<ul style="list-style-type: none"> <li>• Amend the 1st indicator as follows: " There is (...) of Otago's <del>soils</del> <u>highly valued land</u>."</li> <li>• Replace "soil" with "land" throughout the remaining statements of AER 2.4.</li> </ul>	<ul style="list-style-type: none"> <li>• Agrees with the intention of managing, maintaining and retaining soils, and of identifying and managing highly valued soil resources, as soil is a finite resource.</li> <li>• However, the productive capacity of rural land is not solely based on soil fertility and also depends on soil structure, water availability, topography and climate as defined in the Land Use Capability Survey Handbook prepared by Landcare New Zealand (2009).</li> <li>• Rural production includes non-soil based activities, (e.g. intensive poultry farming and horticulture activities), which may use sheds or greenhouses, which need well drained, flat rural land in order to operate, but do not solely rely on soil fertility.</li> <li>• It is important to protect the overall land resource including the soil and land with other characteristics that make it suitable for a range of rural production activities.</li> </ul>
249	Glossaries	Glossary	Amend	<p>Amend as follows:</p> <p>"Highly valued <del>soils</del> <u>land</u> - <u>Land Soils</u> valued for <del>their</del> <u>its</u> significance, including:</p> <p>a. Versatility for primary production, such as highly versatile <del>soils</del> <u>land</u>;</p> <p>etc."</p> <p>and</p> <p>"Highly versatile <del>soils</del> <u>land</u> - Land classified as Land Use Capability I or II in the New Zealand Land Resource Inventory"</p>	<ul style="list-style-type: none"> <li>• Agrees with the intention of managing, maintaining and retaining soils, and of identifying and managing highly valued soil resources, as soil is a finite resource.</li> <li>• However, the productive capacity of rural land is not solely based on soil fertility and also depends on soil structure, water availability, topography and climate as defined in the Land Use Capability Survey Handbook prepared by Landcare New Zealand (2009).</li> <li>• Rural production includes non-soil based activities, (e.g. intensive poultry farming and horticulture activities), which may use sheds or greenhouses, which need well drained, flat rural land in order to operate, but do not solely rely on soil fertility.</li> <li>• It is important to protect the overall land resource including the soil and land with other characteristics that make it suitable for a range of rural production activities.</li> </ul>

**30 Brian Turner**

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Whole Regional Policy Statement (general support)	Support	Resist attempts to alter or reject major parts of the proposed RPS.	<ul style="list-style-type: none"> <li>• We are on the brink of the sixth mass extinction, which is being driven by humans (J. Zalasiewicz, Guardian Weekly)</li> <li>• We have responsibilities towards next generations, but also towards Nature, and we ought to see Nature "as a community" to which we belong and not treat it as a suite of commodities to be exploited with impunity (Aldo Leopold, A Sand County Almanac)</li> <li>• Recent studies comparing the woods where Walden (Thoreau) is set as Thoreau described them and as they are today is illuminating and saddening. Thoreau wrote "Most men, it seems to me, do not care for Nature, and would sell their share in all her beauty, as long as they may live, for a stated sum - many for a glass of rum. Thank God, men cannot as yet fly, and lay waste the sky as well as the earth!"</li> <li>• What is termed "growth" is unsustainable. There are limits, exponential growth is an impossibility, and can only have one end.</li> <li>• Dr Trebor Hancock identified the "ecological determinants of health" as "clean air and water, food, materials, fuel, the great cycles of water, nitrogen and phosphorus; detoxification of wastes, climate stability, and others." Those are threatened by the massive and still growing human-induced global ecological changes now underway.</li> <li>• An increasing number of economists and scientists challenge the way we measure growth and progress; we'd be better off adopting something like the Genuine Progress Indicator, instead of the Gross Domestic Product.</li> <li>• The three Laws of Sustainability, which are the law of limits to growth, the second law of thermodynamics, which exposes the danger of increased energy consumption, and the law of self-organisation, have been cast aside (Tom Wessels, The Myth of Progress: Toward a Sustainable Future).</li> <li>• Humanity is still battling to find ways of altering consciousness away from 'things' galore, techno trinketry and disposable galore.</li> <li>• Central Otago is decreasingly the World of Difference that is advertised, as its difference was the lack of visual pollution on most of its hills and mountain ranges.</li> <li>• "We need to set aside land from our use (...) to prove ourselves that we can do it (...). The battle for the future is (...) between those who are willing to engineer every organism for (...) our Economy, and those who are willing to say there is something other than us that counts" (B. McKibben, Wandering Home).</li> <li>• "The more energetically we pursue our individually, socially isolated right to "life, liberty and the pursuit of happiness", the deader the social and natural worlds become (Curtis, White, Harper's, April 2006).</li> </ul>

**31 John Park**

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Did not specify	Ensure people can use the river for recreation.	On the north bank of the Kakanui River, some property owners claim the boundary is in the centre of the tidewater estuary and they restrict access.

**32 Environment Southland**

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Whole Regional Policy Statement (general support)	Support	Support	Well presented and easy to comprehend; the format, with the addition of needs, combined methods and environmental results and indicators

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Add a new method: <u>Method 7.3.5 - Identifying the region's Nationally and Regionally important transport infrastructure within the Regional Land Transport Plan</u> .	works well and avoids duplication. <ul style="list-style-type: none"> <li>Method 7.3 does not include reference to Nationally or Regionally significant infrastructure - Needs strengthening to ensure the Regional Land Transport Plan identifies the region's Nationally or Regionally significant infrastructure.</li> <li>Southland's freight, tourist and domestic transport needs are dependent on Otago's transport infrastructure.</li> <li>Otago Regional Council and Environment Southland combined resources in the development of an Otago / Southland Regional Land Transport Plan during the 2014/2015 year.</li> <li>Environment Southland, in conjunction with NZTA, developed a GIS-based model to identify the strategically important transport infrastructure. The model could be extended to include Otago to give a combined strategic network across the two regions.</li> <li>This will assist in preparing a more cohesive and effective Regional Land Transport Plan in the future.</li> </ul>
206	Method 7 - Strategies and Plans (non-RMA)	Method 7.3 - Regional Land Transport Plan	Amend	Add a new method: <u>Method 7.3.5 - Identifying the region's Nationally and Regionally important transport infrastructure within the Regional Land Transport Plan</u> .	<ul style="list-style-type: none"> <li>Method 7.3 does not include reference to Nationally or Regionally significant infrastructure - Needs strengthening to ensure the Regional Land Transport Plan identifies the region's Nationally or Regionally significant infrastructure.</li> <li>Southland's freight, tourist and domestic transport needs are dependent on Otago's transport infrastructure.</li> <li>Otago Regional Council and Environment Southland combined resources in the development of an Otago / Southland Regional Land Transport Plan during the 2014/2015 year.</li> <li>Environment Southland, in conjunction with NZTA, developed a GIS-based model to identify the strategically important transport infrastructure. The model could be extended to include Otago to give a combined strategic network across the two regions.</li> <li>This will assist in preparing a more cohesive and effective Regional Land Transport Plan in the future.</li> </ul>

### 33 Angus Mackay

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	<ul style="list-style-type: none"> <li>Greater/faster (ORC measured &amp; recorded) growth of riparian planting zones on water outlets from ALL farms in Otago.</li> <li>Farmers should be given incentives to buy into the project and follow such schemes as being used in Taranaki.</li> <li>Where possible nurseries who specialize in native plants should be recommended for the planting process.</li> </ul>	<ul style="list-style-type: none"> <li>To improve the water-quality of our rivers significantly in line with other more advanced regions e.g. Taranaki.</li> <li>Improve the scenery of our landscape and increase local biodiversity &amp; habitats for our bird-life and other wild-life.</li> <li>Financial incentives for farmers will bring more of the less environmentally interested farmers into the process.</li> <li>Specialist native planting nurseries will provide the expertise and advice required to provide the right mix of native plants to promote a NZ local ecosystem in a riparian environment.</li> </ul>
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	<ul style="list-style-type: none"> <li>More access to the countryside across farmland, akin to the UK model of "mutual respect" between farmer and public.</li> <li>Farmers should receive incentives from the ORC to open up their farms.</li> <li>Allow the development of bridleways, paths and hedgerows/ trees (which will encourage greater biodiversity).</li> <li>Public should show respect to the land and have control over dogs (i.e. obey the law of common sense).</li> </ul>	<ul style="list-style-type: none"> <li>Makes NZ scenery more interesting and accessible to public - too much bush/trees have been stripped away for the sake of commercial gain.</li> <li>Rejuvenation (even just via hedgerows is better than nought). Aids biodiversity.</li> <li>Incentives required to bring less interested farmers into the movement.</li> <li>Makes public appreciate countryside more and what farmers contribute.</li> </ul>



### 34 Shayne and Tracy Kirk

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Support	Support.	It seeks reduction of the potential for adverse health and nuisance effects.
64	Natural systems and interdependencies	Policy 2.3.5 - Applying an integrated management approach for airsheds	Support	Support.	It seeks reduction of the potential for adverse health and nuisance effects.
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Strengthen to include reference to amenity values, and to make it clear that the development of waste facilities should occur in industrial areas and avoid residential areas in urban environments.	Seeks the avoidance of hazardous substances and materials on the health and safety of people.
129	Hazardous substances and waste	Policy suite 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Waste provisions should be improved to make it very clear that industry and residential land use are in conflict and do not mix.	Seeks the avoidance of hazardous substances and materials on the health and safety of people.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Strengthen to include reference to amenity values, and to make it clear that the development of waste facilities should occur in industrial areas and avoid residential areas in urban environments.	Seeks the avoidance of hazardous substances and materials on the health and safety of people.
135	Hazardous substances and waste	Policy 3.9.6 - Encouraging use of best management practices for hazardous substance use	Amend	Strengthen to include reference to amenity values, and to make it clear that the development of waste facilities should occur in industrial areas and avoid residential areas in urban environments.	<ul style="list-style-type: none"> <li>• Own an accommodation business in a residential area close to a resource recovery centre. Owners and customers suffer adverse effects from activities occurring on that site.</li> <li>• Concerned about future plans for a transfer station.</li> <li>• Oppose the location of waste activities and facilities in or near residential areas.</li> </ul>
136	Hazardous substances and waste	Policy 3.9.7 - Encouraging services for hazardous substances collection, recycling and disposal	Amend	Strengthen to include reference to amenity values, and to make it clear that the development of waste facilities should occur in industrial areas and avoid residential areas in urban environments.	<ul style="list-style-type: none"> <li>• Own an accommodation business in a residential area close to a resource recovery centre. Owners and customers suffer adverse effects from activities occurring on that site.</li> <li>• Concerned about future plans for a transfer station.</li> <li>• Oppose the location of waste activities and facilities in or near residential areas.</li> </ul>
167	Management of adverse effects	Policy suite 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Support	Support.	<ul style="list-style-type: none"> <li>• Own an accommodation business in a residential area close to a resource recovery centre. Owners and customers suffer adverse effects from activities occurring on that site.</li> <li>• Concerned about future plans for a transfer station.</li> <li>• Oppose the location of waste activities and facilities in or near residential areas.</li> </ul>

### 35 Alec Saunders

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Support	Would like to see aspects of Objectives 2.1, 2.2 and 2.3 enhanced.	It is vital that our water resources are of high quality and pose no risks for maintaining aquatic species, fishing, drinking, swimming and other aquatic activities.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Add an additional paragraph: (g) " <u>Avoid and mitigate the adverse effects of construction, effluent, farming, forestry, mining and other practices that may introduce contaminants and damage conservation values</u> "	<ul style="list-style-type: none"> <li>• While the policy specifies pests, for example, it does not include degradation caused by human activities, some of which can reduce or destroy the values that the policy is attempting to enhance and preserve.</li> <li>• It is vital that our water resources are of high quality and pose no risks for maintaining aquatic species, fishing, drinking, swimming and other aquatic activities.</li> </ul>
32	Natural resource value	Policy 2.1.2 - Managing for the	Amend	Add a new paragraph to Policy 2.1.2:	<ul style="list-style-type: none"> <li>• While the policy specifies pests, for example, it does not include</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	management - general	values of beds of rivers and lakes, wetlands, and their margins		<u>"(m) Avoid and mitigate the adverse effects of construction, effluent, farming, forestry, mining and other practices that may introduce contaminants and damage conservation values".</u>	degradation caused by human activities, some of which can reduce or destroy the values that the policy is attempting to enhance and preserve. <ul style="list-style-type: none"> <li>It is vital that our water resources are of high quality and pose no risks for maintaining aquatic species, fishing, drinking, swimming and other aquatic activities.</li> </ul>
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Add to Policy 2.1.3: (i) <u>"Avoid and mitigate the adverse effects of construction, effluent, farming, forestry, mining and other practices that may introduce contaminants and damage conservation values".</u>	<ul style="list-style-type: none"> <li>While the policy specifies pests, for example, it does not include degradation caused by human activities, some of which can reduce or destroy the values that the policy is attempting to enhance and preserve.</li> <li>It is vital that our water resources are of high quality and pose no risks for maintaining aquatic species, fishing, drinking, swimming and other aquatic activities.</li> </ul>

### 36 Margaret Katon

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Do more about out of date fires and burning of rubbish	<ul style="list-style-type: none"> <li>Those seeking to keep the air clean face higher costs for heating, whereas others can pollute the air and benefit from lower heating costs.</li> <li>People have other options than fires to avoid cold homes.</li> <li>However, those people affected by breathing problems cannot do anything about how they are affected by pollution.</li> </ul>

### 37 Central Otago District Council

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Whole Regional Policy Statement (general support)	Support	Support the majority of provisions contained in the PRPS, unless stated otherwise in submission.	No reason given.
6	Overall approach	Schedule 3 - Significance threshold	Oppose	Delete Schedule 3.	<ul style="list-style-type: none"> <li>A standard mechanism for assessing significance of adverse effects is a de facto rule and is inappropriate in the RPS.</li> <li>The mechanism will impose ongoing costs as local resource consents will have to address all the matters in Schedule 3.</li> <li>There is a danger of omission by focusing on the matters listed in Schedule 3.</li> <li>Significance of adverse effects must have regard to the relevant provisions of the RMA and plans and the environment under consideration.</li> </ul>
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Explain how the attributes have been determined and align with Schedule 4.	It is unclear how the attributes have been determined and the attributes in policy 2.1.7 are inconsistent with Schedule 4.
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Delete 2.2.2 c)	The standard mechanism for assessing significance of adverse effects is a de facto rule; the clause is unnecessary and inappropriate.
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend Policy 2.2.3 as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes <del>using the attributes as detailed in Schedule 4.</del> "	The compulsion to use attributes in Schedule 4 is inappropriate.
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Delete 2.2.4 c)	The standard mechanism for assessing significance of adverse effects is a de facto rule; the clause is unnecessary and inappropriate.
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend Policy 2.2.5 as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the	The compulsion to use attributes in Schedule 4 is inappropriate.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				environment, but which are not outstanding <del>using the attributes detailed in Schedule 4.</del> "	
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Delete policy 2.2.6 c).	The standard mechanism for assessing significance of adverse effects is a de facto rule; the clause is unnecessary and inappropriate.
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	Refer to "highly valued soils".	Terminology should be consistent with the Glossary.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	<ul style="list-style-type: none"> <li>Refer to "highly valued soils".</li> <li>Delete Policy 2.2.15 c).</li> </ul>	<ul style="list-style-type: none"> <li>Terminology should be consistent with the Glossary.</li> <li>The standard mechanism for assessing significance of adverse effects is a de facto rule; the clause is unnecessary and inappropriate.</li> </ul>
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Delete <del>including hazards of low likelihood and high consequence.</del>	Concepts of likelihood and consequence are too wide ranging and beyond the expertise available to territorial local authorities.
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Delete Policy 3.8.1 f).	Requiring the use of low or no emission heating systems in buildings is a matter that relates to ORC functions and is not one for territorial authorities to be involved in.
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Explicitly acknowledge statutory function of ORC to control use of land for soil conservation and to implement this function in the context of rural land use intensification.	<ul style="list-style-type: none"> <li>ORC has statutory function to control use of land for soil conservation (s30(1)(c)(i)).</li> <li>The ORC has the relevant expertise in this area which territorial authorities do not.</li> </ul>
150	Historic heritage	Policy 4.2.2 - Identifying historic heritage	Amend	Delete <del>using the following attributes, detailed in Schedule 7.</del> "	<ul style="list-style-type: none"> <li>The compulsion to use attributes in Schedule 7 is inappropriate.</li> <li>Unnecessarily restricts flexibility on how to manage historic heritage at the District level.</li> </ul>
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	<ul style="list-style-type: none"> <li>Amend Policy 4.2.3 a) as follows: "Recognising that some places or areas are known <del>or strongly suspected of containing</del> <u>to contain</u> archaeological sites, wahi tapu or wahi taoka which could be of significant historic or cultural value".</li> <li>Delete Policy 4.2.3 e).</li> <li>Amend Policy 4.2.3 f) as follows: "Remediating, when adverse effects on other values cannot be avoided <del>or mitigated</del>".</li> </ul>	<ul style="list-style-type: none"> <li>The reference to recognising some places as strongly suspected of containing archaeological sites is inappropriate and too loose.</li> <li>The standard mechanism for assessing significance of adverse effects is a de facto rule; the clause is unnecessary and inappropriate in the context of the policy.</li> <li>Reference should be made to mitigation to complement Policy 4.2.3(g)</li> </ul>
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Oppose	Delete Policy 4.3.2.	Managing land use change in dry catchments to avoid any significant reduction in water yield is inappropriate.
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend method 3.1.4 as follows: <ul style="list-style-type: none"> <li>Include reference to Policies 2.2.14 and 2.2.15 in the opening paragraph;</li> <li>Add a Method 3.1.4 j): "<u>Implement Policies 2.2.14 and 2.2.15 in the context of rural land use intensification.</u>"</li> </ul>	The method is deficient as it should acknowledge the statutory function of the ORC to control the use of land for soil conservation (s30(1)(c)(i) of the RMA).
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Amend Method 4.1 as follows: <ul style="list-style-type: none"> <li>City and district plans <del>will</del> <u>may</u> set objectives, policies and methods to implement policies in the RPS as they relate to the City or District Council areas of responsibility.</li> <li>Delete Method 4.1.1 b)</li> <li>Delete Method 4.1.2</li> <li>Delete Method 4.1.4</li> </ul>	<ul style="list-style-type: none"> <li>The method is too directive and compels territorial authorities to comply with all the policies in the RPS. This will have significant cost implications and may lead to inappropriate outcomes at a local level, particularly in the context of historic heritage (Policy 4.2.2).</li> <li>It is uncertain what "recently identified natural hazards" are.</li> <li>A requirement to impose conditions on the type of heating systems allowed in the cold climate of Central Otago is inappropriate and unnecessary.</li> <li>A requirement to manage land use in dry catchments where this will impact water yield is inappropriate and unnecessary given the quantity of tussock covered land in Central Otago.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend Method 4.2.1 as follows: "City or district councils <del>will</del> <u>may</u> implement Policies 3.2.2 and 3.2.3 when undertaking natural hazard assessments".	<ul style="list-style-type: none"> <li>The method is too directive and assessing the likelihood and consequences in terms of Policy 3.2.2 and 3.2.3 is beyond the expertise of territorial authorities.</li> <li>The method is too directive and compels territorial authorities to</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>Amend Method 4.2.2 as follows: "City or district councils <del>will</del> <u>may</u> implement Policies 2.2.1, 2.2.3, 2.2.5 and 2.2.8 to assess the values of places of potential significance to inform the decision making process".</li> <li>Delete Method 4.2.4.</li> </ul>	<p>comply with RPS policies 2.2.1, 2.2.3, 2.2.5 and 2.2.8. CODC has completed landscape categorisation plan changes and does not wish to review process and incur associated costs.</p> <ul style="list-style-type: none"> <li>Method 4.2.4 will impose significant costs on territorial authorities by requiring them to undertake structure plans for large scale land use change. Structure plans are best prepared by private interests promoting plan changes.</li> </ul>
195	Method 4 - City and District Plans	Method 4.3 - Monitoring and reviewing district plans	Amend	Amend Method 4.3.1 as follows: "City and district councils will monitor and review <del>regional district and city</del> plans to give effect to its responsibilities under the RMA."	The reference to "regional plans" is an error.
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Support	<ul style="list-style-type: none"> <li>Retain Method 6.1.2</li> <li>Delete Method 6.1.3 b)</li> <li>Retain Method 6.1.3 c)</li> </ul>	<ul style="list-style-type: none"> <li>6.1.2 - The identification of ONL, ONF and SALs is appropriate provided the attributes relevant to such identification are determined at a local level.</li> <li>6.1.3 b) - A requirement for territorial local authorities to manage water quantities in dry catchments and areas of tussock grasslands is inappropriate and unnecessary.</li> <li>6.1.3 c) - The method is consistent with ORC statutory functions to control lands use for soil conservation (s30(1)(c)(i)).</li> </ul>
199	Method 6 - Research, Monitoring and Reporting	Method 6.2 - Research	Amend	<p>Amend Method 6.2.1 as follows:</p> <ul style="list-style-type: none"> <li>6.2.1 d) i) - The inventory and mapping of Otago's soil resources <u>and their suitability for rural land use intensification.</u></li> <li>6.2.1 d) ii) - The location and extent of <del>high class and versatile</del> <u>highly versatile</u> soil in Otago.</li> <li>6.2.1 h) - Retain Method 6.2.1 h)</li> <li>6.2.1 j) - Retain Method 6.2.1 j)</li> </ul> <p>Amend Methods 6.2.2 &amp; 6.2.3 as follows: "Regional, city and district councils <del>will</del> <u>may</u>:"</p>	<ul style="list-style-type: none"> <li>Method 6.2.1 d) i) The method needs to go further to refer to investigating and providing guidance on the use of Otago's soil resources for rural land use intensification. This is consistent with ORC's statutory functions under RMA S30(1)(c)(i).</li> <li>Method 6.2.1 d) ii) Terminology for soils is inconsistent with the RPS glossary.</li> <li>Method 6.2.1 h) It is appropriate for the ORC to support district councils with information on natural hazards.</li> <li>Method 6.2.1 j) It is appropriate for the ORC to make information on the expected effects of climate change available.</li> <li>Methods 6.2.2 &amp; 6.2.3 are too directive and are likely to impose costs on local communities.</li> </ul>
200	Method 6 - Research, Monitoring and Reporting	Method 6.3 - State of Environment Reporting	Oppose	Delete Method 6.3.1.	Method 6.3.1 is superfluous as it duplicates the duty in Section 35(2) of the RMA.
201	Method 6 - Research, Monitoring and Reporting	Method 6.4 - RMA plan effectiveness reporting	Oppose	Delete Method 6.4.1.	Method 6.4.1 is superfluous as it duplicates the duty in Section 35(2) of the RMA.
202	Method 6 - Research, Monitoring and Reporting	Method 6.5 - Plan implementation reporting	Oppose	Delete Method 6.5.2.	Method 6.5.2 is superfluous as it duplicates the duty in Section 35(2A) of the RMA.
207	Method 7 - Strategies and Plans (non-RMA)	Method 7.4 - Pest management strategy	Amend	Inserting 7.4.1 a) <u>iv) Have propensity for wilding tree spread.</u>	The pest management strategy should address the control of trees with a propensity for wilding tree spread.
213	Method 8 - Education and Information	Method 8.1.3 - Information from city and district councils - compulsory	Amend	<ul style="list-style-type: none"> <li>Delete Method 8.1.3 a) or clearly state that city and district councils "may" collate and make information available.</li> <li>Delete Method 8.1.3 b).</li> <li>Delete Method 8.1.3 c).</li> </ul>	<ul style="list-style-type: none"> <li>Method 8.1.3 a) is too directive and is likely to impose costs on the local community.</li> <li>Methods 8.1.3 b) and c) are superfluous as they duplicate the duty under s44A fo the Local Government Official Information and Meetings Act 1987.</li> </ul>
215	Method 9 - Funding	Method 9 - Funding	Amend	Delete reference to district councils from Method 9.1.1.	The reference to district councils establishing funds and funding community groups and projects is inappropriate in the context of the RPS and may raise unwarranted expectations for funding by the community.
216	Method 10 - Service Provision	Method 10 - Service Provision	Oppose	Delete Method 10.1.1.	The method is superfluous and states the obvious.
221	Method 11 - Advocacy and Facilitation	Method 11.1.4 - Promotion by city and district councils - compulsory	Amend	Delete Methods 11.1.4 a) and b).	<ul style="list-style-type: none"> <li>Method 11.1.4 a) is inappropriate as it may not be necessary in all instances to promote the use of elements that reflect local character. This is not a regional issue.</li> <li>Method 11.1.4 b) is inappropriate, unnecessary and not a regional issue.</li> </ul>
223	Method 11 - Advocacy and	Method 11.2.1 - Facilitation by	Amend	Amend Method 11.2.1 as follows: Regional,	Method 11.2.1 is too directive and is likely to impose costs on the local

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	Facilitation	regional, city and district councils - compulsory		city and district councils <del>will</del> <u>may</u> :	community.
253	Other comments	Structure of the document & useability - general	Amend	Present the relevant objectives, policies and methods together.	For ease of use.
259	Overall approach	Regionally significant issues	Amend	State the significant resource management issues for the Otago region.	<ul style="list-style-type: none"> <li>The RPS fails to state the significant resource management issues for the Otago region, and hence fails to achieve the purpose of the RMA 1991.</li> <li>In the absence of those issues, the PRPS advances policies and methods which are best determined at a local and not regional level.</li> </ul>
301	Objectives on use and enjoyment of natural and built environment	Introduction to Objective 4.5	Amend	In the second introductory paragraph of Objective 4.5 make the following changes: delete <del>Section 2.3</del> and replace with <u>Objective 2.2</u> .	Reference to Section 2.3 is incorrect.

### 38 M L Soal

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Did not specify	<ul style="list-style-type: none"> <li>Refrain from any further interference with control of land use.</li> <li>There should be no policy double covering restrictions on use of legally purchased land.</li> </ul>	<ul style="list-style-type: none"> <li>This is already suffocated enough with the District plan.</li> <li>It is not the council's prerogative to cause land holders excessive costs regarding land use / change.</li> <li>RMA states that criteria exist for land use with regard to "economic, social...etc". This is just another attempt to acquire control of land use by resource consent.</li> <li>What is "significant" is highly subjective.</li> <li>Council's idea of significant may differ from mine or anyone else's.</li> </ul>
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Did not specify	<ul style="list-style-type: none"> <li>Refrain from any further interference with control of land use.</li> <li>There should be no policy double covering restrictions on use of legally purchased land.</li> </ul>	<ul style="list-style-type: none"> <li>This is already suffocated enough with the District plan.</li> <li>It is not the council's prerogative to cause land holders excessive costs regarding land use / change.</li> <li>RMA states that criteria exist for land use with regard to "economic, social...etc". This is just another attempt to acquire control of land use by resource consent.</li> </ul>

### 39 William George Lloyd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
7	Chapter B1 - Kai Tahu values	Chapter B1 - general requests	Amend	Remove all references to Kai Tahu values rights and interests; kaitiakitaka, also the Treaty of Waitangi, the Waitangi Tribunal and any specified or unspecified privileges to those claiming some Maori blood.	<ul style="list-style-type: none"> <li>Under the Treaty of Waitangi, the chiefs gave up their territories and government.</li> <li>Queen Victoria's letters patent confirm that that Sovereignty was legally obtained.</li> <li>Neither document gave special rights to any part of the population.</li> <li>We all became British subjects, given the same rights, no more no less, irrespective of race, colour or creed.</li> </ul>

### 40 Otago Peninsula Biodiversity Group

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Support	Concur with this objective.	No reason given.
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Support	We support this policy.	No reason given.
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Support	<ul style="list-style-type: none"> <li>Objective largely repeats the philosophies and intent of Objective 2.1, albeit with different wording. The differing emphasis, and level of detail, could be explained more clearly in the</li> </ul>	Clarification of the emphasis and level of details will benefit readers unfamiliar with RPS terminology.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Preamble to this (and other) sections. • Concur with this objective as written.	
42	Highly valued natural resources - indigenous biodiversity	Policy 2.2.1 - Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna	Support	Strongly support Policy 2.2.1, identifying areas of significant indigenous flora and habitats of indigenous fauna.	No reason given.
43	Highly valued natural resources - indigenous biodiversity	Schedule 5 - Criteria for the assessment of significant indigenous vegetation and habitat of indigenous fauna	Support	• Applaud the inclusion of these criteria in the RPS: the ORC should make all efforts to see these applied in all subordinate plans and policies across Otago. • This Schedule may be the place to include criteria for environmental offsetting.	No reason given.
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	• Support the tenor of "management" of areas of significant vegetation and faunal habitat • Amend policy, or insert another policy, giving the criteria or circumstances under which the aims of protection and enhancement can be over-ridden for economic or other purposes. • Add to this Policy clause e) from Policies 2.2.4 and 2.2.6.	• It is not possible to "protect and enhance" an area of vegetation or a habitat, and at the same time impose adverse effects on that area. Adverse effects by definition cannot protect, and mitigating those effects will not enhance the vegetation or habitat. • Controlling pest species (both floral and faunal) is essential in maintaining and enhancing areas of significant biodiversity and habitat.
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Support	We support this objective.	No reason given.
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Support	Concur with these policies.	No reason given.
161	Objectives on use and enjoyment of natural and built environment	Objective 4.4 - Otago's communities can make the most of the natural and built resources available for use	Support	Generally support this objective.	No reason given.
165	Making the most of available resources	Policy 4.4.3 - Encouraging environmental enhancement	Support	Strongly support this policy.	Many of the clauses and sub-policies reinforce the current activities and strategic aims of the OPBG.
167	Management of adverse effects	Policy suite 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Support	Generally concur with these policies.	No reason given.
172	Management of adverse effects	Policy 4.5.5 - Controlling the introduction and spread of pest plants and animals	Amend	• Strongly support this policy. • Insert an additional sub-policy requiring specific plant and animal pest species to be identified in all planning documents that are subordinate to this RPS.	• This policy is fundamental to the aims and activities of the OPBG. • In the past, action on some pest species has been conspicuously lacking, as not all pests have been identified as such, or their significance has been downplayed in spite of ardent advocacy by concerned groups or individuals.
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Subject the concept of offsetting to the most stringent criteria, which could be spelled out in detail in this section or in an Appendix.	We recognise that offsetting has been used as a tool in the past to allow (or force) development in inappropriate areas or habitats, although the concept is not universally accepted and may be seriously flawed (e.g. Walker et al. 2009).
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	• Subject the concept of offsetting to the most stringent criteria, which could be spelled out in detail in this section or in an Appendix. • Amend sub-policy d) by removing the qualifying "if practicable".	• We recognise that offsetting has been used as a tool in the past to allow (or force) development in inappropriate areas or habitats, although the concept is not universally accepted and may be seriously flawed (e.g. Walker et al. 2009). • There is little point in having a temporary offset when the ecosystem damage is permanent.
177	Roles and responsibilities	Roles and responsibilities	Amend	Clarify the role of Central Government and concerned departments (e.g. the Department of	For the avoidance of doubt about responsibilities.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Conservation) in maintaining indigenous biodiversity.	
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	The identification of significant indigenous vegetation or faunal habitat (beyond wetlands, the coast, lakes and rivers) should be undertaken by Regional, City and District councils in concert.	<ul style="list-style-type: none"> <li>The distribution of responsibilities as given under method 6.1.2 may not be realistic. The DCC (for example) may not have the ability or financial resources to identify and survey such ecologically important areas to the degree of detail or thoroughness required to implement policies such as 2.2.2.</li> <li>Such joint responsibility is already accepted for management of coastal margins, rivers, lakes and wetlands (refer PRPS p. 93).</li> <li>This was also a conclusion drawn on p. 23 of the Section 32 Evaluation Report of the PRPS.</li> </ul>
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Amend	Include developing and implementing a Biodiversity Strategy in this RPS, and give it equal status with the Pest Management Strategy.	<ul style="list-style-type: none"> <li>The ORC 2014-2015 Annual Plan, the draft Long Term Plan, and the Review of the current RPS all referred to development of a Biodiversity Strategy.</li> <li>OPBG has already submitted on these documents, strongly supporting the ORC in developing such a strategy.</li> <li>No clear reason why it has been omitted from this method.</li> </ul>
207	Method 7 - Strategies and Plans (non-RMA)	Method 7.4 - Pest management strategy	Amend	Amend wording to state that ORC "will", rather than "may" commit to also developing a pan-regional pest management strategy.	<ul style="list-style-type: none"> <li>Pest management strategy will now highlight the effect of pests on areas of significant indigenous biodiversity and habitat.</li> <li>The 2014-2015 Annual Plan seems to already commit ORC to doing this.</li> </ul>
215	Method 9 - Funding	Method 9 - Funding	Amend	Make a commitment from ORC to providing financial support to community groups and projects.	We recognise that this RPS cannot commit or require City and District councils to do this.
224	Method 11 - Advocacy and Facilitation	Method 11.2.2 - Facilitation by regional council - compulsory	Amend	Endorse the commitment to facilitating the control of pest species.	List of noxious plant and animal pest species is long. Query the mention of wilding pines alone.
229	Anticipated Environmental Results	AER 2.1 - The extent of, and values of, significant and highly valued natural resources and heritage in Otago are protected or enhanced	Amend	<ul style="list-style-type: none"> <li>Agree with indicators and possible measures to confirm that Otago's natural values and resources are protected and enhanced.</li> <li>Add specific policy clarifying which organisations will be responsible for the establishment and maintenance of the public inventories of the outstanding and significant features in question.</li> </ul>	Concerned that the PRPS merely states that the indicators "can" be measured – not that they "will" be measured.
233	Anticipated Environmental Results	AER 2.5 - The health and diversity of Otago's ecosystems is maintained or enhanced	Amend	<ul style="list-style-type: none"> <li>Identify which organisations are to be responsible for this monitoring.</li> <li>State whether those responsibilities are to be delegated to Regional Plans, Annual Plans or other regulations.</li> </ul>	<ul style="list-style-type: none"> <li>The PRPS merely states that the indicators "can" be measured – not that they "will" be measured.</li> <li>Without specific identification of which organisations are to be responsible for this monitoring, this Anticipated Outcome may be just window dressing.</li> </ul>
251	Other comments	Implementation	Amend	Require that policies and strategies which aim to protect and enhance conservation of indigenous vegetation and biodiversity values are both implemented and enforced.	No reason given.
265	Chapter B2 - High quality natural resources	Outcome 2 and introduction	Amend	Preamble to the chapter lists economy first. Natural resources and ecosystems should be given higher priority.	Without natural resources and ecosystems, there is no economy. But natural resources and ecosystems are not only there to keep the economy going or for human benefit: we merely exploit them.
266	Objectives on high quality natural resources	Need 2.1	Amend	Amend to acknowledge that the ecosystem services and resources do not just exist for human benefit.	Without natural resources and ecosystems, there is no economy. But natural resources and ecosystems are not only there to keep the economy going or for human benefit: we merely exploit them.
267	Objectives on high quality natural resources	Need 2.2	Amend	Rephrase to acknowledge that "these matters" are fundamental to the continual survival of all species, not just to people and their "economic advantage".	Without natural resources and ecosystems, there is no economy. But natural resources and ecosystems are not only there to keep the economy going or for human benefit: we merely exploit them.
269	Objectives on high quality natural resources	Introduction to Objective 2.1	Amend	Amend as follows: " <u>both direct and</u> indirect consequences"	<ul style="list-style-type: none"> <li>Without natural resources and ecosystems, there is no economy. But natural resources and ecosystems are not only there to keep the</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					economy going or for human benefit: we merely exploit them. <ul style="list-style-type: none"> <li>Land use does not only have "indirect consequences" on biodiversity: wholesale clearing of native vegetation is not indirect.</li> </ul>
270	Objectives on high quality natural resources	Introduction to Objective 2.2	Amend	We suggest that the differing emphasis, and level of detail of this objectives, as compared with Objective 2.1, be explained more clearly in the Preamble to this (and other) sections.	<ul style="list-style-type: none"> <li>Without natural resources and ecosystems, there is no economy. But natural resources and ecosystems are not only there to keep the economy going or for human benefit: we merely exploit them.</li> <li>Objective 2.2 largely repeats the philosophies and intent of Objective 2.1. Clarification of the emphasis and level of details will benefit readers unfamiliar with RPS terminology.</li> </ul>

#### 41 Herbert Heritage Group

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	<ul style="list-style-type: none"> <li>Amend Policy 2.1.1 a) as follows: <del>Support healthy ecosystems in all Otago aquifers, Protect and maintain healthy ecosystems, and restore degraded ecosystems, in all Otago aquifers,</del> and rivers, lakes, wetlands, and their margins;</li> <li>Amend Policy 2.1.1 l) as follows: Protect important recreation values <u>including the ability to swim, fish, and gather food</u>;</li> </ul>	<ul style="list-style-type: none"> <li>Horrified at the degradation of our rivers.</li> <li>No longer able to swim and drink from rivers such as the Kakanui, where took his family swim in and picnic by, 20 years ago.</li> <li>The Waitaki District Council's biodiversity strategy shows that something needs to be done ow to prevent species extinction and restore ecosystems.</li> </ul>
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	<ul style="list-style-type: none"> <li>Amend Policy 2.1.3(h) as follows: Protect important recreation values <u>including the ability to swim, fish, and gather food</u>;</li> </ul>	No reason given.
114	Energy	Policy 3.6.6 - Reducing long term demand for fossil fuels	Amend	<ul style="list-style-type: none"> <li>Amend name of Policy 3.6.6 as follows: Reducing <del>long term</del> demand for fossil fuels.</li> <li>Amend Policy 3.6.6 as follows: Reduce the <del>long term</del> demand for fossil fuels from Otago's communities, by:</li> </ul>	No reason given.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	<p>Add methods to specify that City and District Plans will set objectives, policies and methods to implement policies 2.1.6 &amp; 2.2.2, by including provisions to:</p> <ul style="list-style-type: none"> <li>Manage indigenous vegetation clearance using case by case assessments to determine whether an area of indigenous vegetation or habitat is significant and warrants protection.</li> <li>Include appropriate regulatory methods that control the clearance or modification of, indigenous vegetation and habitats of indigenous fauna.</li> <li>Require ecological assessments to accompany a resource management proposal or plan for an activity or development that may affect areas of indigenous vegetation and habitats of indigenous fauna.</li> </ul>	The Waitaki District Council's biodiversity strategy shows that something needs to be done ow to prevent species extinction and restore ecosystems.
259	Overall approach	Regionally significant issues	Amend	<ul style="list-style-type: none"> <li>Insert a "Significant Resource Management Issues for Otago" section between Part A and Part B.</li> <li>Include: <ul style="list-style-type: none"> <li>Water over-allocation and degradation - both water quality and quantity;</li> <li>Biodiversity loss and habitat degradation;</li> <li>Coastal ecosystem health (especially that of</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Horrified at the degradation of our rivers.</li> <li>No longer able to swim and drink from rivers such as the Kakanui, where family swam and picnicked by 20 years ago.</li> <li>The Waitaki District Council's biodiversity strategy shows that something needs to be done now to prevent species extinction and restore ecosystems.</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				estuaries and wetlands); - Climate change impacts (especially sea level rise); as significant resource management issues for Otago.	

#### 42 Phil Murray

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Support	Strongly support this outcome and the general thrust of Objectives 2.1 to 2.3.	No reason given.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	<ul style="list-style-type: none"> <li>• Include a clearer definition of "good water quality" in Policy 2.1.1(f)</li> <li>• Delete "important" from Policy 2.1.1(l)</li> </ul>	<ul style="list-style-type: none"> <li>• As proposed, "good water quality" seems to be an undefined quality. Some standard or description of the meaning of "good" would give more confidence.</li> <li>• All recreation values should be protected.</li> <li>• As worded, Policy 2.1.1(l) may result in accepting water bodies to degrade, if those water bodies are not recognised as important for recreation.</li> <li>• Uncertainty around what water bodies the Council considers as containing important recreation values: the ORC staff do not recognise the Manuherikia as being important for recreation and yet it is a significant river for local kayakers and for locals swimming in the summer.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Add clause: "Maintain and enhance their recreation value"	Rivers' recreation values are often very dependent on good management of their beds and margins.
80	Natural hazard risk	Policy suite 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Policies should identify the underlying causes of natural hazards and seek to manage resources in a way that reduces natural hazard risk including climate change.	No reason given.
93	Climate change	Policy suite 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Amend	Include policies that address the cause of climate change and reduce emission that affect the climate.	<ul style="list-style-type: none"> <li>• Proposed policies inadequate as do not address the causes of climate change.</li> <li>• It is necessary and appropriate that climate change be addressed at all levels of government.</li> </ul>
167	Management of adverse effects	Policy suite 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Amend	Require controls on land use change to intensive farming, including dairy or dairy support, in sensitive catchments such as the Manuherikia Valley.	<ul style="list-style-type: none"> <li>• Policies 4.5.1 (Avoiding objectionable discharges) and 4.5.2 (Applying an adaptive management approach) inadequately address the adverse effects of land uses, as this approach has proved inadequate in the past.</li> <li>• Overseer not designed for the purpose for which it is being used (predict N).</li> <li>• Holding individual land users to account will not be possible with the likely levels of monitoring available.</li> <li>• The regime relies on retrospectively enforcing limits.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Include in Method 3.1.4 actions that directly control and direct land use intensification by applying standards and limits such as those applied in Horizons and Bay of Plenty Regional Plans.	Method 3.1.4 does not directly address the major threats to freshwater values to achieve Policy 2.1.1, that being land use intensification, particularly to dairying.
207	Method 7 - Strategies and Plans (non-RMA)	Method 7.4 - Pest management strategy	Amend	Regional Pest [Strategies] including rules should be adopted to achieve Outcome 2, along with supporting strategies and plans and the early implementation of Method 8.	No reason given.
230	Anticipated Environmental Results	AER 2.2 - Otago's water bodies support healthy ecosystems, are safe for swimming, and maintain	Amend	Include as an indicator: "Otago rivers are safe for swimming".	<ul style="list-style-type: none"> <li>• People's ability to safely swim in rivers is one of the most readily understood and appreciated water quality indicator.</li> <li>• Increased number of rivers where people have stopped swimming</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		their natural form and character			(e.g. the Taieri) because of health risks. • Very concerned the Manuherikia will head in the same direction.

### 43 Airways Corporation of New Zealand Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Submitter seeks additional policies that adequately recognise the built environment as a physical resource to support Objective 2.1.	<ul style="list-style-type: none"> <li>• Policies focus largely on natural resources.</li> <li>• The assets of Airways as part of the built environment are also a physical resource with a very important value in terms of the function they perform for the community.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend e: Protect infrastructure corridors <u>and networks</u> for infrastructure needs, now and for the future.	<ul style="list-style-type: none"> <li>• Is not clear what 'infrastructure corridors' refers to.</li> <li>• Navigable airspace and airport approach surfaces are essential for safe operation of aircraft and airports, but are not clearly visible or identifiable.</li> <li>• Not all infrastructure is located in corridors, but operated as a network such as Airways' network of navigation installations.</li> </ul>
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend e: Ports, <u>and airports and navigation infrastructure.</u>	The policy has overlooked critical features such as navigation installations, which are not always located at airports.
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	Amend e: Protecting infrastructure corridors <u>and networks</u> for infrastructure needs, now and for the future.	<ul style="list-style-type: none"> <li>• Supportive of policy intent, particularly b and c.</li> <li>• Is not clear what 'infrastructure corridors' refers to.</li> <li>• Navigable airspace and airport approach surfaces are essential for safe operation of aircraft and airports, but are not clearly visible or identifiable.</li> <li>• Not all infrastructure is located in corridors, but operated as a network such as Airways' network of navigation installations.</li> </ul>
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Support	Retain.	<ul style="list-style-type: none"> <li>• Policy recognises that some industrial activities can create reverse sensitivity effects.</li> <li>• Discharges to air can have adverse effects upon aircraft safety which submitter seeks to eliminate.</li> <li>• Aircraft stability and safety can be affected by high velocity vertical discharges, and can impact pilot visibility.</li> <li>• Concerned that there is no recognition of this in the RPS.</li> </ul>
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Amend	Amend: c) Odorous or conspicuous discharges <u>- or Discharges that have adverse effects on aircraft safety.</u>	<ul style="list-style-type: none"> <li>• Discharges can have other effects than those mentioned.</li> <li>• While it could be argued a discharge affecting aircraft stability or visibility could be classed as 'objectionable', such matters could be more explicitly highlighted.</li> </ul>
249	Glossaries	Glossary	Support	Retain, particularly support i and j [in the definition of infrastructure].	Airways supports the retention and definition of infrastructure proposed.
258	Other comments	Consequential amendments & other amendments providing relief	Amend	[Provide] such further or consequential relief as may be necessary to fully give effect to the relief sought in this submission.	No reason given.

### 44 Bus Users Support Group Otepoti-Dunedin (Bus Go Dunedin)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Support	Recommend public transport using clean, modern buses as a means of achieving this policy.	
93	Climate change	Policy suite 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Amend	Include positive steps to reduce the contribution by Otago people and industry on human-influenced global warming, including encouraging the use of public transport as one contribution to a low-carbon economy.	Disappointed the idea of preventing climate change is neglected.
96	Objectives on resilience, health and safety	Objective 3.4 - Good quality infrastructure and services meet community needs	Amend	<ul style="list-style-type: none"> <li>• Support objective.</li> <li>• Include public transport as a solution to good quality infrastructure.</li> </ul>	

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Support	Support.	To ensure the public transport network is considered whenever planning decisions are made.
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Support	Support.	To keep public transport decision making as a key consideration in planning. To achieve this public transport also needs to be included in the definition of infrastructure.
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Support	<ul style="list-style-type: none"> <li>• Support objective.</li> <li>• Add long distance passenger transport services in the quoted list of examples of infrastructure of national and regional significance in the introduction to this objective..</li> </ul>	
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Add " <u>g) networks of passenger transport services between towns and cities</u> "	
114	Energy	Policy 3.6.6 - Reducing long term demand for fossil fuels	Support	<ul style="list-style-type: none"> <li>• Support the inclusion of public transport as a means to help achieve this policy.</li> <li>• Amend b)iii. to "Having high design standards for pedestrian <del>and cyclist</del> , cyclist and public transport users' safety and amenity;"</li> </ul>	
116	Urban design	Policy suite 3.7 - Urban areas are well designed, sustainable and reflect local character	Amend	Include public transport as a solution to making better urban areas.	
118	Urban design	Schedule 6 - Urban form and design	Support	Support and commend the inclusion of "(d) creates transport networks that are safer."	
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend Policy 3.7.4 as follows: "Design public spaces, including streets and open spaces, to meet the reasonable access and mobility needs of all sectors within the community, including the young <del>and those with mobility</del> , <u>the aged, families, and those with mobility, sensory or cognitive impairments.</u> "	
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Support	Support policy	Support policy however, note its success in ensuring that public transport infrastructure is efficiently extended alongside urban growth also depends upon public transport being included in the definition of 'Infrastructure'.
249	Glossaries	Glossary	Amend	Amend the definition of infrastructure to include: " <u>m) a network of public transport stops, passenger shelters and facilities linked by local or long-distance public transport services operating on public transport routes</u> "	<ul style="list-style-type: none"> <li>• Support many of the policies referring to infrastructure and its integration to communities.</li> <li>• Unclear that the importance given to infrastructure planning includes public transport.</li> <li>• Public transport is crucial to the development of sustainable communities. Best way to enable this is for public transport to be included in the definition of infrastructure.</li> <li>• Would ensure public transport decision making is a key consideration in planning, through Policy 3.4.2.</li> <li>• Would make Policy 3.8.1 ensure that public transport infrastructure is efficiently extended alongside urban growth.</li> </ul>
285	Objectives on resilience, health and safety	Introduction to Objective 3.4	Amend	Amend introduction to Objective 3.4 to include public transport.	Support Objective 3.4.
286	Objectives on resilience, health and safety	Introduction to Objective 3.5	Amend	Amend introduction to Objective 3.5 to include <u>long distance passenger transport services</u> in the quoted list of examples of infrastructure of national and regional significance.	Support Objective 3.5

#### 45 Michael Rawlinson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
31	Natural resource value	Policy 2.1.1 - Managing for	Support	Support health freshwater habitat and	

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	management - general	freshwater values		sustainability.	
167	Management of adverse effects	Policy suite 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Amend	Encourage and incentivise less intensive farming practices.	High stocking rates that rely on imported feed lead to high nutrient losses and greater financial risk (Water Quality in New Zealand, June 2015, Parliamentary Commissioner for the Environment).
178	Methods	Methods - general	Amend	Replant riparian strips that are damaged by floods following excessive killing and removal of riparian vegetation.	Previously deep, shaded pools on the Waikouaiti are now shallow, unshaded and silty due to erosion caused by a combination of floods and excessive vegetation removal. These pools are now useless as insect and fish habitat.

#### 46 Jenny Olsen

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
178	Methods	Methods - general	Amend	<p>Include the following method in Section C: <u>Method 12 International Trade and Investment Agreements</u></p> <p><u>In order to protect the ability of the Regional Council to follow the policies contained in this Statement, now and in the future, the Otago Regional Council encourages the government to conclude negotiations on the Trans Pacific Partnership and other Free Trade Agreements in a way that provides net positive benefits for the Otago Region and New Zealand, that is, provided the Partnership and Agreements achieve the following objectives:</u></p> <p><u>i. Continues to allow the Otago Regional Council and other Councils, if they so choose, to adopt procurement policies that provide for a degree of local preference: to choose whether particular services or facilities are provided in house, by council-controlled organisations (CCOs) or by contracting out; or to require higher health and safety, environmental protection, employment rights and conditions, community participation, animal protection or human rights standards than national or international minimum standards;</u></p> <p><u>ii. Maintains good diplomatic and trade relations and partnerships for Otago and New Zealand with other major trading partners not included in the agreement including with China;</u></p> <p><u>iii. Provides substantially increased access for our agriculture exports, particularly those from the Otago region into the US Market;</u></p> <p><u>iv. Does not undermine PHARMAC, raise the cost of medical treatments and medicines or threaten public health measures, such as tobacco control;</u></p> <p><u>v. Does not give overseas investors or suppliers any greater rights than domestic investors and suppliers such as through introducing Investor-State Dispute Settlement, or reduce our ability to control overseas investment or finance;</u></p> <p><u>vi. Does not expand intellectual property rights and enforcement in excess of current law;</u></p>	<ul style="list-style-type: none"> <li>Trade and investment agreements can have profound effects on the local environment and economy by allowing activities by overseas investors that would be contrary to the intentions stated in the RPS.</li> <li>The Trans Pacific Partnership contains Investor State Dispute Settlement (ISDS) clauses and many other elements which may be contrary to the intentions of the RPS.</li> <li>ISDS clauses give overseas investors rights to sue governments that deny them permission to invest, even if the investment results in an environmentally damaging activity.</li> <li>For this reason, it is important for the RC to formally state a position on the expectations of central government with respect to protecting the interests of the regions when negotiating such treaties.</li> <li>The points outlined in the proposed policy addition above are intended to ensure that any trade and investment agreement brings benefits to everyone in our region and protects our environment for the future.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>vii. <u>Does not weaken our public services, require privatisation, hinder reversal of privatisations, or increase the commercialization of Government or of Otago Regional Council or other local government organisations;</u></p> <p>viii. <u>Does not reduce our flexibility to support local economic and industry development and encourage good employment and environmental practices;</u></p> <p>ix. <u>Contains enforceable labour clauses requiring adherence to core International Labour Organisation conventions and preventing reduction of labour rights for trade or investment advantage;</u></p> <p>x. <u>Contains enforceable environmental clauses preventing reduction of environmental and biosecurity standards for trade or investment advantage;</u></p> <p>xi. <u>Has general exemptions to protect human rights, the environment, the Treaty of Waitangi, and New Zealand's economic and financial stability;</u></p> <p>xii. <u>Has been negotiated with real public consultation including regular public releases of drafts of the text of the agreement, and ratification being conditional on a full social, environmental, and economic impact assessment including public submissions.</u></p>	

#### 47 Lynne Stewart

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Support	Strongly support this outcome and the general thrust of Objectives 2.1 to 2.3.	No reason given.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	<ul style="list-style-type: none"> <li>• Include a clear definition of "good water quality" in Policy 2.1.1(f), to mean safe for human use, so our children and grandchildren will not be sick after swimming in our rivers, they will not get water poisoning;</li> <li>• Delete "important" from Policy 2.1.1(l)</li> </ul>	<ul style="list-style-type: none"> <li>• Some standard or description of the meaning of "good" would give more confidence.</li> <li>• All recreation values should be protected.</li> <li>• As worded, Policy 2.1.1(l) may result in accepting water bodies to degrade, if those water bodies are not recognised as important for recreation.</li> <li>• Uncertainty around what water bodies the Council considers as containing important recreation values: the ORC staff do not recognise the Manuherikia as being important for recreation and yet it is a significant river for local kayakers year round and for locals swimming in the summer.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	<p>Add clauses:</p> <ul style="list-style-type: none"> <li>• "<u>Maintain and enhance their recreation value;</u></li> <li>"</li> <li>• "<u>Maintain and enhance the ecological biodiversity of the river and riversides.</u>"</li> </ul>	Rivers' recreation values are often very dependent on good management of their beds and margins.
80	Natural hazard risk	Policy suite 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Policies should identify the underlying causes of natural hazards and seek to manage resources in a way that reduces natural hazard risk including climate change.	No reason given.
93	Climate change	Policy suite 3.3 - Otago's communities are prepared for	Amend	Include policies that address the cause of climate change and reduce CO2 emissions.	• Proposed policies inadequate as do not address the causes of climate change.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		and able to adapt to the effects of climate change			<ul style="list-style-type: none"> <li>It is necessary and appropriate that climate change be addressed at all levels of government.</li> </ul>
167	Management of adverse effects	Policy suite 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Amend	<ul style="list-style-type: none"> <li>Require controls on land use change to intensive farming, including dairy or dairy support, in sensitive catchments such as the Manuherikia Valley.</li> <li>Controls such as the fencing of riversides as well as riparian planting of a good (20 metres) width.</li> </ul>	<ul style="list-style-type: none"> <li>Policies 4.5.1 (Avoiding objectionable discharges) and 4.5.2 (Applying an adaptive management approach) inadequately address the adverse effects of land uses, as this approach has proved inadequate in the past, and has led to significant public cost for restoration.</li> <li>Land use controls would be more credible than relying on farmers filling out Overseer to remain within discharge limits. Relying on government funding and farmers to change farming practices is unsustainable.</li> <li>Overseer not designed for the purpose for which it is being used (predict N), and is not good enough yet as a model.</li> <li>Holding individual land users to account will not be possible with the likely levels of monitoring available.</li> <li>The public does not have the funds to clean up the rivers.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Include in Method 3.1.4 actions that directly control and direct land use intensification by applying standards and limits such as applied in Horizons and Bay of Plenty Regional Plans.	<ul style="list-style-type: none"> <li>Method 3.1.4 does not directly address the major threats to freshwater values to achieve Policy 2.1.1, that being land use intensification, particularly to dairying.</li> <li>Otago does not have the population to pay for our lakes to be cleaned up after dairying.</li> </ul>
207	Method 7 - Strategies and Plans (non-RMA)	Method 7.4 - Pest management strategy	Amend	Regional Pest [Strategies] including rules should be adopted to achieve Outcome 2, along with supporting strategies and plans and the early implementation of Method 8.	No reason given.
230	Anticipated Environmental Results	AER 2.2 - Otago's water bodies support healthy ecosystems, are safe for swimming, and maintain their natural form and character	Amend	Include as an indicator: "Otago rivers are safe for human use, safe for swimming".	<ul style="list-style-type: none"> <li>People's ability to safely swim in rivers is one of the most readily understood and appreciated water quality indicator.</li> <li>Increased number of rivers where people have stopped swimming (e.g. the Taieri) because of health risks.</li> <li>Very concerned the Manuherikia will head in the same direction.</li> <li>Seeing the Central Otago Whitewater's first slalom, at the Alexandra Blossom Festival, compromised because of unsafe water quality would be outrageous. Worse would be to see children and grandchildren getting sick with water poisoning.</li> </ul>

#### 48 J.C.F. Rowley

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
94	Climate change	Policy 3.3.1 - Adapting to, or mitigating the effects of, sea level rise	Did not specify	<ul style="list-style-type: none"> <li>Recognise that even if presumption is correct, the effects may be less or much less than a metre.</li> </ul>	<ul style="list-style-type: none"> <li>ORC role is to help mitigate adverse effects, not accept them.</li> <li>Use engineering solutions e.g. The Netherlands.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Did not specify	Regional Councils have no authority to override or oversee District Councils.	No reason given.
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Did not specify	The solution is water harvesting - build dams.	The issue is not one of managing or restricting land use.

#### 49 Central Otago Wilding Conifer Control Group

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Support	Support.	Strongly support the notion that the social and economic wellbeing of Otago's people and communities strongly relies on the quantity and quality of Otago's natural resources.
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Support	Support.	Support the general tenor of these policies. Grateful to see ecosystem and indigenous biodiversity values (Policy 2.1.6) and natural features and landscapes (Policy 2.1.7) recognised.
36	Natural resource value	Policy 2.1.6 - Managing for	Support	Support.	Strongly support. Grateful to see clause h, which would include the

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	management - general	ecosystem and indigenous biodiversity values			need to address wilding conifer spread.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Support	Support.	Strongly support the recognition of the various attributes from which landscape is derived.
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Support	Support.	Note and support items a) - f).
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Support	Support.	Note and support policy.
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Support	Support.	Note and support e).
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Support	Support.	Note and support.
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Support	Support.	Note and support e).
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Support	Support.	Note and support d).
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Support	Support.	Strongly support recognition of this and the need to work with district councils in a co-ordinated approach to achieve these objectives.
80	Natural hazard risk	Policy suite 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Policies should, in addition to what is proposed, identify the underlying causes of natural hazards and support the reduction of natural hazard risk.	<ul style="list-style-type: none"> <li>• Many natural hazards we face have been created or exacerbated by actions or inactions - they're not all entirely "natural".</li> <li>• The spread of wilding conifers in dry parts of Central Otago is significantly increasing the natural fire hazard.</li> <li>• Policy heading does not lead to identifying and addressing underlying causes of natural hazards and treats "natural hazards" as unavoidable. As a consequence, it provides no feedback to the planning process which may lead to reducing natural hazards.</li> </ul>
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Could read as follows: Identifying natural hazards <u>and their causes</u>	<ul style="list-style-type: none"> <li>• Many natural hazards we face have been created or exacerbated by actions or inactions - they're not all entirely "natural".</li> <li>• The spread of wilding conifers in dry parts of Central Otago is significantly increasing the natural fire hazard.</li> <li>• Policy heading does not lead to identifying and addressing underlying causes of natural hazards and treats "natural hazards" as unavoidable. As a consequence, it provides no feedback to the planning process which may lead to reducing natural hazards.</li> </ul>
82	Natural hazard risk	Policy 3.2.2 - Assessing natural hazard likelihood	Amend	Could read as follows: "Assessing natural hazard likelihood <u>and trends</u> ".	<ul style="list-style-type: none"> <li>• Many natural hazards we face have been created or exacerbated by actions or inactions - they're not all entirely "natural".</li> <li>• The spread of wilding conifers in dry parts of Central Otago is significantly increasing the natural fire hazard.</li> <li>• Policy heading does not lead to identifying and addressing underlying causes of natural hazards and treats "natural hazards" as unavoidable. As a consequence, it provides no feedback to the planning process which may lead to reducing natural hazards.</li> </ul>
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Could read as follows: "Avoiding <u>increasing</u> natural hazard risk <u>including</u> by :	<ul style="list-style-type: none"> <li>• Many natural hazards we face have been created or exacerbated by actions or inactions - they're not all entirely "natural".</li> <li>• The spread of wilding conifers in dry parts of Central Otago is</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<u>c) Adopting plan policies that reduce natural hazard risk.</u> <u>d) Managing the use and development of natural and physical resources in a way that does not contribute to increased natural hazard risk and climate change."</u>	significantly increasing the natural fire hazard. • Policy heading does not lead to identifying and addressing underlying causes of natural hazards and treats "natural hazards" as unavoidable. As a consequence, it provides no feedback to the planning process which may lead to reducing natural hazards.
165	Making the most of available resources	Policy 4.4.3 - Encouraging environmental enhancement	Support	Support.	Strongly support.
172	Management of adverse effects	Policy 4.5.5 - Controlling the introduction and spread of pest plants and animals	Support	Support this policy.	No reason given.
207	Method 7 - Strategies and Plans (non-RMA)	Method 7.4 - Pest management strategy	Amend	The RPS provide specific direction on the review of the Regional Pest Management [Strategy] such as follows: <u>Regional Plans will set objectives, policies and methods for achieving Policies 2.1.6, 2.1.7, 2.2.2, 2.2.3, 2.2.4, 2.2.5, 2.2.6, 2.2.13, 3.2, 4.4.3 and 4.5.5 in part by addressing the issue of wilding conifer spread through the Regional Pest Management [Strategy].</u>	It would provide a stronger statement of intent if more specific direction, of how the council intends addressing the adverse effects of pest plants, particularly wilding conifers, is recognised in RPS policies.
207	Method 7 - Strategies and Plans (non-RMA)	Method 7.4 - Pest management strategy	Amend	Method 7.4 to include a clause: The regional council will: a) ... iv) <u>Have an adverse effect on significant landscape values.</u>	Pest plants, particularly wilding conifers are recognised in the RPS as having adverse effects on a number of values important to the Otago community including landscape values. This should be recognised in this section.
207	Method 7 - Strategies and Plans (non-RMA)	Method 7.4 - Pest management strategy	Did not specify	Regional pest (strategies) that include rules in line with that currently being developed by the working group under MPI should be adopted to achieve [Objective 2.1] along with supporting strategies and plans.	No reason given.
210	Method 8 - Education and Information	Method 8 - Education and Information	Did not specify	Early implementation of Method 8, education and information.	No reason given.

### 50 Anna Hughes

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Did not specify	Wording around protection of our natural resources and ecosystem services needs to be stronger.	This is a core objective of regional councils - the protection and sustainable (not just efficient) use of natural resources and ecosystem services. Stronger wording and commitment to provisions stated in the PRPS would guide the ORC practices to better outcomes in terms of "high quality natural resources and ecosystems" and "resilient, safe and healthy" communities, now and into the future.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	<ul style="list-style-type: none"> <li>The ORC need to take a stronger stance on air pollution, particularly in the form of CO2 from the burning of fossil fuels.</li> <li>Burning of coal for heating needs to be phased out.</li> </ul>	<ul style="list-style-type: none"> <li>This was evident in the Clutha district during a cold snap this winter when air quality for residents was particularly low.</li> <li>This form of pollution is also contributing to climate change for future generations.</li> <li>The ORC are in a position to encourage economic development in the area of heating, utilising any forest byproducts and other technologies through primary industry.</li> <li>Stronger wording and commitment to provisions stated in the PRPS would guide the ORC practices to better outcomes in terms of "high quality natural resources and ecosystems" and "resilient, safe and healthy" communities, now and into the future.</li> </ul>
93	Climate change	Policy suite 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Amend	<ul style="list-style-type: none"> <li>Instead of phrases like "The effects of climate change over the next 100 years should be considered.", would like to see a stronger stance such as "The effects of climate change</li> </ul>	<ul style="list-style-type: none"> <li>There seems to be a strong emphasis on adaptation and mitigation.</li> <li>Climate change is of no benefit to future Otago residents, we're all part of a global community.</li> <li>For future generations it is essential that the ORC focus on</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				over the next 100 years will be responsibly addressed." <ul style="list-style-type: none"> <li>• Include statements that show thinking and action is based on the interconnections of our global world and inter-generationally.</li> <li>• The ORC must put measures in place to decrease Otago's contribution to climate change - such as a cheaper and more extensive public transport system within and between main centres, divestment from fossil fuels, diversifying use of rural land to decrease water pollution and contribution to climate change from dairy and provide greater economic resilience into the future.</li> </ul>	decreasing human contribution to climate change in the Otago Region and advocate for this to happen nationally too. <ul style="list-style-type: none"> <li>• Displaced people worldwide will be flocking to more temperate climates and we will be in a position of accommodating a greater number of people or defending our shores.</li> <li>• Stronger wording and commitment to provisions stated in the PRPS would guide the ORC practices to better outcomes in terms of "high quality natural resources and ecosystems" and "resilient, safe and healthy" communities, now and into the future.</li> </ul>
129	Hazardous substances and waste	Policy suite 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Did not specify	The ORC needs stricter controls/policing of private rural landfills and the burning of waste on rural properties.	<ul style="list-style-type: none"> <li>• These issues contribute to water pollution, poor air quality and contaminated soils for future owners of properties.</li> <li>• Stronger wording and commitment to provisions stated in the Proposed Regional Policy Statement would guide the ORC practices to better outcomes in terms of "high quality natural resources and ecosystems" and "resilient, safe and healthy" communities, now and into the future.</li> </ul>
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Amend	Any changes of land use that reduce available water in Otago's dry and vulnerable catchments <b>MUST BE MINIMISED</b> - not just "carefully considered."	Strong likelihood of severe droughts and floods due to climate change.
210	Method 8 - Education and Information	Method 8 - Education and Information	Did not specify	[Provide] education on core objectives.	<ul style="list-style-type: none"> <li>• Apart from a few community and school-based stream care workshops there seems to be very little in the way of education on ORC core objectives. A society educated on how to take action to address the issues that are RPS objectives will lead to better outcomes.</li> <li>• Stricter rules and policing of pollutants must go hand in hand with positive, future-focused education. Environment Southland and Northland Regional Council both have extensive and effective education programmes. I encourage the ORC to look to these councils as role models of effective education.</li> </ul>

### 51 The Southern District Health Board

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	A Health in All Policies (HiAP) approach to be utilised with several themes applicable to all RPS policy areas. For example sustainability, climate change, urban growth and growth boundaries, to be considered in all policies, rather than having these addressed as separate points.	To assist in fulfilling RPS visions.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Supports with following amendment to 2.1.1 i): Retain the quality and reliability of existing drinking water supplies <u>supply sources, improve catchment and groundwater quality in areas where there is likely demand for sources in future;</u>	Whilst water treatment technology can be used to address reduced raw water quality for drinking water, it is better to prioritise the protection and improvement of potential raw water sources
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Support and add following clauses: <ul style="list-style-type: none"> <li>• (i) <u>ensure that coastal elements (built environment including such features as wharves, boat ramps and recreational areas)</u></li> </ul>	<ul style="list-style-type: none"> <li>• The effect of coastal waters on localised structures (in relation to climate change) cannot be ignored in the RPS.</li> <li>• Untreated stormwater discharges into coastal waters have been taken for granted over past century.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<u>are designed to be resistant to the effects of global warming and in particular rises in sea level.</u> • (k) <u>ensure that where at all practicable to do so, stormwater discharges in the coastal environment are treated to the point that the effect of the discharge on the environment is no more than minor.</u>	<ul style="list-style-type: none"> <li>• Technology is available which would improve discharge quality from our towns and city.</li> <li>• The ORC should be forward looking, rather than focusing on the status quo.</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Support with the following amendments: "a) Avoiding significant adverse effects, including cumulative effects, on those values which contribute to the water body or wetland being outstanding (such as the effects of nutrient enrichment through land use and possible algal blooms); and".	An example would be helpful to further clarify what is being stated.
62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Support	Support.	Submitter fully supports policy for a fully integrated approach to freshwater that incorporates the effects of land management on water quality.
63	Natural systems and interdependencies	Policy 2.3.4 - Applying an integrated management approach for the coastal environment	Support	Support.	Submitter fully supports this policy
92	Objectives on resilience, health and safety	Objective 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Support	Support.	Submitter is fully supportive of this objective as written.
114	Energy	Policy 3.6.6 - Reducing long term demand for fossil fuels	Amend	Amend Policy 3.6.6 by adding the following clause: <u>d) Reduce the need for freight by promoting local economies for food and produce;</u> <u>i) foster the uptake of new technologies for more efficient energy uses, or renewable or lower emission transport fuels such as electric rail.</u> <u>ii) develop a carefully planned and equitable strategy to phase out the use of fossil fuels for home heating. This will included transitioning the housing stock to improved housing efficiency and increasing the use of renewable energy for heating.</u>	<ul style="list-style-type: none"> <li>• Promoting active transport options, favouring alternative lower emission fuels (renewable energy sources), and promoting alternative energy sources such as electric and hybrid electric vehicles, is likely to lessen the reliance on fossil fuels and reduce the incidence of road injuries/ fatalities.</li> <li>• Lower emission transport fuels and home heating will also have positive effect on health of communities through improved air quality.</li> <li>• When embracing new technologies it is important to consider their sustainability, for example some biofuels are not low emission when land conversion is included in the analysis.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Support policy but seek following amendments to Policy 3.8.1 f) ii) <del>Vulnerable to degradation given the local climatic and geographical context</del> <u>Encourage all existing urban buildings to transition to low or no-emission heating systems ;</u>	<ul style="list-style-type: none"> <li>• The blanket approach may create further inequality on communities without the means to supplement new or retrofitted equipment.</li> <li>• It is important that urban growth planning considers the impact to the whole urban environment, not just where the development is occurring.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend Policy 3.8.3 c) as follows: Avoid unplanned demand for provision of infrastructure, including domestic water supply and waste disposal; and <u>for agencies to work together to ensure there is a coordinated approach to the development of infrastructure.</u> <u>i) ensure that rural fragmentation considers the impact of road use to ensure that road safety is</u>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><u>maintained (minimising the risk of road traffic accidents) and active transport can be promoted.</u></p> <p><u>ii) ensure rural fragmentation is undertaken in a way that supports local economies that provide security for the region with primary industry and food.</u></p>	
130	Hazardous substances and waste	Policy 3.9.1 - Integrating management of hazardous substances and waste	Amend	<p>Amend Policy 3.9.1 to include the following statement:</p> <p><u>Promotion of an integrated approach to waste management will include the promotion and participation in (to facilitate compliance) National Stewardship schemes such as industry led stewardship programmes for the removal and recycling of used tyres.</u></p>	<ul style="list-style-type: none"> <li>As with other sections, we believe there are opportunities for more leadership from the regional council.</li> <li>This could largely be achieved by greater communication between agencies but primarily ORC and the territorial authorities (along with Public Health).</li> </ul>
136	Hazardous substances and waste	Policy 3.9.7 - Encouraging services for hazardous substances collection, recycling and disposal	Amend	<p>Amend Policy 3.9.7 to include the following statement:</p> <p><u>Promotion of an integrated approach to waste management will include the promotion and participation in (to facilitate compliance) National Stewardship schemes such as industry led stewardship programmes for the removal and recycling of used tyres.</u></p>	<ul style="list-style-type: none"> <li>As with other sections, we believe there are opportunities for more leadership from the regional council.</li> <li>This could largely be achieved by greater communication between agencies but primarily ORC and the territorial authorities (along with Public Health).</li> </ul>

## 52 New Zealand Defence Force

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Support	Retain this policy.	The policy appropriately recognises the functional needs of infrastructure of regional or national importance.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	<p>Amend Policy 3.5.1 as follows:</p> <p>"Recognise the national and regional significance of the following infrastructure: (...)</p> <p>f) Structures for transport by rail ; <u>and</u></p> <p>g) <u>Defence facilities.</u>"</p>	<ul style="list-style-type: none"> <li>Other regions' RPSs give specific recognition and protection to defence facilities.</li> <li>New Zealand Defence facilities play a significant role in both military training and civil and/or national defence operations and in supporting search and rescue operations and infrastructure support capabilities, and they are essential to enabling NZDF to fulfil its obligations under the Defence Act.</li> <li>Given the importance of NZDF's facilities in maintaining the nation's security, meeting international obligations, and providing for the well-being and safety of communities, it is appropriate for defence facilities to be explicitly recognised in Policy 3.5.1.</li> <li>The decision requested will provide for the management and protection of defence facilities via Policies 3.5.2 and 3.5.3.</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Support	Retain Policy 3.5.3 with the inclusion of defence facilities in Policy 3.5.1.	NZDF support explicit recognition of the need to protect significant infrastructure from reverse sensitivity effects which have the potential to curtail or constrain the operation of such infrastructure.
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>Amend the definition of infrastructure by adding "<u>defence facilities</u>" to the list.</li> <li>Clarify the definition of "reverse sensitivity" (e.g. "The potential for the operation of an existing lawfully established activity to be constrained or curtailed by the more recent establishment of other activities which are sensitive to the pre- existing activity.")</li> </ul>	<ul style="list-style-type: none"> <li>Decision requested for consistency with the requested amendments to Policy 3.5.1.</li> <li>The definition of reverse sensitivity within the RPS could be clearer.</li> </ul>
286	Objectives on resilience, health and safety	Introduction to Objective 3.5	Amend	Amend Objective 3.5's associated text as follows (or words to similar effect): " <u>Infrastructure of national and regional</u>	<ul style="list-style-type: none"> <li>With the exception of ports and airports, these provisions only provide for linear infrastructure as being regionally or nationally significant.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				significance, including roads, rail, electricity generation and transmission, <u>defence facilities</u> , and telecommunication etc."	• Other infrastructure e.g. defence facilities serve a critical regional and national function in "achieving community resilience" and should be recognised accordingly under Objective 3.5.

### 53 N G Trevathan

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Would like the RPS to recognise the social and economic importance of resource use with particular emphasis on how it will affect future production opportunities, especially farming.	Prescriptive nature of the RPS.

### 54 Waitaha Iwi

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Overall approach	Introduction - The Treaty Partner	Amend	<ul style="list-style-type: none"> <li>• Add text to end of first paragraph of Takata Whenua section (p.7): " <u>From the East Coast of the North Island</u> "</li> <li>• Add new second paragraph: " <u>However there are Waitaha who are also Takata Whenua for Otago and consider Rakaihautu their primary ancestor and have no interest in being labelled Ngai Tahu</u> "</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to the end of first paragraph adds accuracy.</li> <li>• If the Regional Council is to follow government directive to consult with tangata whenua they must include the many Waitaha who choose to follow the Tikanga and teachings of Rakaihautu.</li> <li>• Ngai tahu's claim to exclusivity over Te Wai Pounamu is based on a Maori Apellate Court decision, which did not consider Waitaha's status as takata whenua.</li> <li>• Waitaha have kept continuous Ahi Ka.</li> </ul>

### 55 Scope Resources Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Support	Retain Policy 4.3.4, with any minor amendments necessary in order to achieve the intent of this submission.	<ul style="list-style-type: none"> <li>• The Queenstown Lakes District is consistently one of the higher growth districts within New Zealand. Its population requires supporting commercial and business zoning in order to grow in a sustainable manner.</li> <li>• (d) enables smaller centres to support local needs. In Queenstown, the Coneburn proposed business and industrial area is well placed to provide work opportunities and services to Jacks Point's residents.</li> </ul>
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Support	Retain Policy 4.3.5, with any minor amendments necessary in order to achieve the intent of this submission.	<ul style="list-style-type: none"> <li>• Planning for industrial and business areas is essential: these zones have a lower monetary value per square metre than residential and commercial land, and are seldom the first choice when rezoning land for additional development.</li> <li>• There is a finite amount of land suitable for this zoning in Queenstown where much of the rural area is of high landscape value.</li> <li>• It is important to support landowners who wish to undertake industrial activities in suitable areas.</li> </ul>

### 56 Alliance Group Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Overall approach	Whole Regional Policy Statement (general opposition)	Amend	Withdraw the proposed RPS in the event that the amendments sought in the submission are not implemented.	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	Amend as follows: "Ensure that local authorities exercise their functions and powers, to: a) <del>Accord Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,</del> ... d) <del>Ensure Kai Tahu have the prerogative to:</del> Recognise and provide for Kai Tahu to identify	<ul style="list-style-type: none"> <li>• Maintaining good working relationship with Kai Tahu when dealing with resource management issues is already a requirement inherent within the RMAS6(e), 7(a) and 9.</li> <li>• Clause (a) does not appear to have an identified resource management purpose and should be deleted. It is inconsistent with the notification determination which focuses on the extent of effects, not the status of a party.</li> <li>• Clauses (d) and (e) require further amendment to better align with sections 6 and 7 of the RMA.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><u>their relationship with their ancestral lands, water, sites, wahi tapu and other taoka by:</u></p> <p>i. <u>Identify their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka;</u> and</p> <p>ii. <u>Determine how best to express that relationship;</u> and</p> <p>e) <u>Ensure Kai Tahu are able to Have regard to the exercise of kaitiakitaka; and ..."</u></p>	
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Kai Tahu values, <del>rights</del> and interests and customary resources are <del>sustained</del> <u>recognised and provided for</u> ."	<ul style="list-style-type: none"> <li>• A requirement to "recognise and provide for" Kai Tahu values will provide a broader framework for the management of these values.</li> <li>• Reference to "rights" should be deleted as the subsequent policies do not provide any further context around what specific "rights" are being referred to.</li> </ul>
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Support	Maintain objective as notified.	Concerned about how this objective will be applied in practice. For this objective to be useful it needs to be supported by additional policies that recognise, maintain and enhance physical resources.
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Include additional policies that recognise, maintain and enhance physical resources	Current policies are insufficient to achieve Objective 2.1 as they only address natural values and not physical values.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend as follows: "Recognise freshwater values, and manage freshwater, to: ... c) <u>Protect the values of</u> outstanding water bodies and wetlands; and ... j) <del>Protect</del> <u>provide for</u> Kai Tahu values; and k) <del>Provide for other cultural values; and ...</del> p) <u>Maintain the ability of existing infrastructure and industry that provides for the economic, health and safety and social wellbeing of the community, to operate within their design parameters and provide for appropriate upgrade and expansion of infrastructure and industry. Maintain the ability of water users to provide for the economic, health and safety and social wellbeing of the community.</u> "	<ul style="list-style-type: none"> <li>• Amend so that it suitably recognises and provides for the development and growth of infrastructure that relies on fresh water resources.</li> <li>• The policy also needs to recognise the use of freshwater in providing for the social and economic wellbeing of the community.</li> <li>• Enabling industry that relies on freshwater resources to only operate within the bounds of existing parameters discourages growth.</li> <li>• Better guidance is required as to how policies will be implemented and what outcome is intended.</li> <li>• Unclear what is intended by protecting Kai Tahu values and providing for other cultural values.</li> </ul>
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend the policy as follows: "Recognise coastal water values, and manage coastal water, to: ... f) <del>Protect</del> <u>Provide for</u> Kai Tahu values; and ... j) <u>Maintain the ability to use coastal water for infrastructure and by those providing for the economic, health and safety and social wellbeing of the community.</u> "	Alliance is concerned that this policy does not suitably recognise that the use of coastal water resources can also be essential to the economic and social wellbeing of the region.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend the policy as follows: "Recognise air quality values, and manage air quality, to: ... b) <del>Protect</del> <u>Provide for</u> Kai Tahu values; and"	It is not clear why Kai Tahu values are to be elevated above all other resource management issues relating to the management of air quality, in that they are required to be protected.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend the policy as follows: "Recognise soil values, and manage soils, to: ... g) <del>Protect</del> <u>Provide for</u> Kai Tahu values; and ... h) <del>Provide for other cultural values, and ...</del> m) <u>Maintain the ability to use soils for infrastructure and by those providing for the</u>	<ul style="list-style-type: none"> <li>• It is not clear why Kai Tahu values are to be elevated above all other resource management issues relating to the management of soil, in that they are required to be protected.</li> <li>• This policy does not suitably recognise that the use of soil resources can also be essential to the economic and social wellbeing of the region.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<u>economic, health and safety and social wellbeing of the community.</u> "	
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>This policy applies to all ecosystems, indigenous and otherwise, and has no regard to the significance of these ecosystems.</li> <li>As other policies provide for areas of significance this policy is not needed.</li> </ul>
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Amend	Amend as follows: "Otago's significant and highly-valued natural resources are identified, and protected <del>or enhanced</del> <u>from inappropriate use or development.</u> "	This objective is too restrictive and generic in that it seeks to "protect" all of Otago's significant and highly valued natural resources.
42	Highly valued natural resources - indigenous biodiversity	Policy 2.2.1 - Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: "Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna <u>at a regional level</u> ."	Alliance consider it appropriate that those areas within the region that are significant are identified at the regional level.
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: "Protect and <u>where appropriate</u> enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding <u>where practicable</u> adverse effects on those values which contribute to the area or habitat being significant; and ..."	It would be appropriate that this policy acknowledged that the "protection" of significant indigenous vegetation and habitats of significant fauna can also be achieved via appropriate mitigation and/or offset strategies.
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	<ul style="list-style-type: none"> <li>Amend the policy as follows: "Policy 2.2.3 Identifying outstanding natural features, landscapes and seascapes <u>at the regional level</u>."</li> <li>Consider remove this policy or Policy 2.1.7.</li> <li>Clarify wording</li> </ul>	<ul style="list-style-type: none"> <li>Support criteria in that they are consistent with case law and the National Coastal Policy Statement (NZCPS)</li> <li>Better guidance is needed from the regional authority to ensure local authorities apply the criteria consistently.</li> <li>District Councils should be guided by an assessment identifying outstanding landscapes and features at the regional level.</li> <li>Within Otago, landscape values differ remarkably, for example Queenstown Lakes has a number of outstanding and remarkable landscapes, whereas Oamaru has comparatively less and a landscape which has deemed to be of outstanding value in the Oamaru context might not be awarded such a status elsewhere in Otago e.g. Queenstown Lakes.</li> <li>Policy 2.2.3 reads essentially as a repeat of Policy 2.1.7.</li> <li>Unclear whether the policy will only apply to "outstanding natural landscapes" and "outstanding natural seascapes"</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Oppose	Delete this policy or amend clause a) as follows: "a) Avoiding <u>significant</u> adverse effects on those values which contribute to the significance of the natural feature, landscape or seascape; and"	<ul style="list-style-type: none"> <li>This policy seeks to combine a number of different resource management issues (section 6(a), 6(b) RMA, and policies 13 and 15 of the NZCPS) and directives, and the result is somewhat confused.</li> <li>Clause a) goes further than part 2 of the Act. It leaves no room to provide for important physical resources such as infrastructure or other activities common in areas of outstanding value.</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Policy 2.2.5 Identifying special amenity landscapes and highly valued natural features <u>at a regional level.</u> "	<ul style="list-style-type: none"> <li>It is appropriate to identify landscapes that have high amenity values.</li> <li>Following a regional wide landscape study, local authorities should be responsible for identifying such areas within their respective Districts.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Oppose	Delete this policy or rewrite to focus more on the maintenance of amenity landscapes.	<ul style="list-style-type: none"> <li>This policy seeks to protect landscapes and features that are not deemed to be "outstanding" in accordance with RMA S6(b).</li> <li>It is appropriate to manage the adverse effects on amenity values, but the focus of this policy should not be to "protect" such landscapes.</li> <li>Avoiding significant adverse effects establishes an inappropriately high threshold test.</li> </ul>
49	Highly valued natural resources - the coastal environment	Policy 2.2.7 - Identifying the landward extent of the coastal	Amend	<ul style="list-style-type: none"> <li>Amend to be consistent with Policy 1 of the NZCPS.</li> </ul>	<ul style="list-style-type: none"> <li>This policy is not fully consistent with Policy 1 of the NZCPS.</li> <li>The Otago RPS should be more definitive in identifying the extent</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		environment		<ul style="list-style-type: none"> <li>• Insert a map defining the extent of the coastal environment and amend to be consistent with the NZCPS.</li> </ul>	of the coastal environment in Otago.
50	Highly valued natural resources - the coastal environment	Policy 2.2.8 - Identifying areas of high and outstanding natural character in the coastal environment	Amend	<ul style="list-style-type: none"> <li>• Amend the policy to read: "Policy 2.2.8 Identifying areas of high and outstanding natural character in the coastal environment <u>at a regional level.</u>"</li> <li>• Identify at the regional level those areas of outstanding natural character in the coastal environment.</li> </ul>	<ul style="list-style-type: none"> <li>• It is appropriate and consistent with the NZCPS to identify areas of outstanding natural character in the coastal environment.</li> <li>• This should be undertaken as part of the development of the RPS.</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend clause a) as follows: "a) Avoiding <u>significant</u> adverse effects on those values which contribute to the outstanding natural character of an area; and"	<ul style="list-style-type: none"> <li>• This policy is generally consistent with giving effect to policy 13 of the NZCPS.</li> <li>• It should seek to avoid adverse effects that are more than minor or non-transitory, as per the discussion on the Supreme Court in the King Salmon case.</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>• It is appropriate to identify areas of high valued soil resource.</li> <li>• This policy appears to be an unnecessary duplication of the matters contained within Policy 2.1.5.</li> </ul>
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>• RMA requirement that the life supporting capacity of the soil resource is sustained, is not the same as requiring its protection and the avoidance of adverse effects.</li> <li>• It is not appropriate to apply the management regime established by the NZCPS on outstanding natural character and outstanding natural landscapes within the coastal environment to all resource aspects throughout the Region.</li> <li>• The policy repeats Policy 2.1.5, which is better worded as it refers to the maintenance of soil values.</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend this objective so it seeks to achieve the integrated management of the natural and physical resources of the region, including consideration of economic benefits.	<ul style="list-style-type: none"> <li>• The policies for this objective all relate to integrated management.</li> <li>• The human use and economic benefits from development of natural and physical resources also need to be considered.</li> <li>• The current drafting of the objective fails to achieve this as it only refers to natural resource systems.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>• The intended purpose or outcome of this policy is not clear.</li> <li>• It is inappropriate to try to manage resources in an integrated manner when only focusing on one resource.</li> <li>• Given the more specific policies that follow relating to the direction of integrated management on certain resource values Alliance submits that this policy should be deleted.</li> </ul>
62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Amend	Amend to recognise that in achieving integrated management the human use and economic values of the resource should also taken into account.	<ul style="list-style-type: none"> <li>• This directive is probably derived from the NPS for Freshwater.</li> <li>• The Proposed RPS provides no further guidance as to how 'freshwater objectives' are to developed, what matters should be considered and how they should be applied at the regional level.</li> <li>• More detailed and transparent guidance on these freshwater objectives is required if the obligations inherent within the NPS for Freshwater are to be achieved.</li> <li>• The human use (i.e. economic and community) values of resources should be clearly recognised and provided for in the integrated management of natural and physical resources</li> </ul>
63	Natural systems and interdependencies	Policy 2.3.4 - Applying an integrated management approach for the coastal environment	Amend	Amend to recognise that in achieving integrated management the human use and economic values of the resource should also taken into account.	The human use (i.e. economic and community) values of resources should be clearly recognised and provided for in the integrated management of natural and physical resources
64	Natural systems and interdependencies	Policy 2.3.5 - Applying an integrated management	Amend	Amend to recognise that in achieving integrated management the human use and economic	The human use (i.e. economic and community) values of resources should be clearly recognised and provided for in the integrated

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		approach for airsheds		values of the resource should also taken into account.	management of natural and physical resources
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Oppose	Delete Objective 3.1.	<ul style="list-style-type: none"> <li>This objective is too vague to be effective and meaningful in its implementation.</li> <li>It is not clear what is meant by "environmental constraint".</li> </ul>
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Oppose	Delete Policy 3.1.1.	<ul style="list-style-type: none"> <li>Reference to "environmental constraint" is ambiguous and should be removed.</li> <li>It is not at all clear how this policy will be implemented in practice and what this would mean for developments and activities throughout the region.</li> <li>The weighing of individual policies that provide for development and those that seek protection will ensure that environmental constraints are considered.</li> </ul>
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate to seek to minimise the risk from natural hazards to communities.
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate to identify natural hazards present within the Otago region.
82	Natural hazard risk	Policy 3.2.2 - Assessing natural hazard likelihood	Support	Retain the objective as notified (or similar wording to achieve relief).	<ul style="list-style-type: none"> <li>It is appropriate to assess the likelihood of natural hazard events occurring.</li> <li>The method places the onus on the ORC and territorial authorities to undertake this work: it would be inappropriate for every resource user to have to complete an individual natural hazard assessment.</li> </ul>
83	Natural hazard risk	Policy 3.2.3 - Assessing natural hazard consequence	Support	Amend policy to make it clear that the natural hazard assessment will be undertaken at a strategic level.	This assessment should be part of a higher level strategic assessment by the regional council.
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate that urban development takes place in a manner which takes into account the existing environment and minimises potential conflicts between incompatible activities.
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Support	Amend by: <ul style="list-style-type: none"> <li>Inserting the following clause between b) and c):  <u>" Avoiding urban development which constrains the ability of regionally significant infrastructure or industry to be developed and used due to adverse effects relating to reverse sensitivity or safety; and "</u> </li> <li>Renumbering clauses c) to h) accordingly.</li> </ul>	To effectively manage urban growth, conflicts and reverse sensitivity effects should be considered, particularly with respect to the encroachment of incompatible activities around key infrastructure assets and industrial providers that support the social and economic wellbeing of the community.
130	Hazardous substances and waste	Policy 3.9.1 - Integrating management of hazardous substances and waste	Support	Retain the objective as notified (or similar wording to achieve relief).	Because hazardous substances are managed by a number of different agencies an integrated approach will need to be adopted, taking into consideration the various roles and responsibilities at a national, regional and local level.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Oppose	Delete Policy 3.9.5.	<ul style="list-style-type: none"> <li>It is not clear what implications this policy might have on development throughout the region.</li> <li>Airports, ports, and other infrastructure and industrial activities are listed on the Ministry for the Environment's HAIL list.</li> <li>This policy could be interpreted to mean facilities that use hazardous substances will become contaminated sites and therefore should be avoided.</li> </ul>
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for economic production	Amend	Amend the objective as follows: " <u>Ensure that appropriate rural, commercial and industrial development is enabled to provide for the social, economic and cultural wellbeing of the</u>	<ul style="list-style-type: none"> <li>It is not clear from the objective what is intended to be achieved.</li> <li>The ensuing policies appear to enable the development of rural, commercial and industrial activities, however it is not clear from the drafting of this objective that this is what will be achieved.</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				community."	
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate to recognise and provide for the development and ongoing use of industrial activities that are essential to the economic and social wellbeing of the region.
166	Objectives on use and enjoyment of natural and built environment	Objective 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Oppose	Amend Objective 4.5 as follows: "Adverse effects <u>arising from the development use of Otago's natural and physical resources are avoided, remedied or mitigated</u> -of-using-and enjoying Otago's natural and built environment are minimised."	<ul style="list-style-type: none"> <li>• Reference to enjoyment is vague and subjective.</li> <li>• The objective should relate to the development and use of Otago's natural and physical resources.</li> <li>• It should also seek to avoid, remedy or mitigate adverse effects on such resources.</li> </ul>
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Oppose	Delete this policy or amend it as follows: "Avoiding <u>Managing</u> objectionable discharges Avoid <u>remedy or mitigate</u> discharges that are objectionable or offensive to takata whenua and the wider community, including: ... iv. In close proximity to mahika kai sites; <del>or</del> <del>c) Odorous or conspicuous discharges.</del> "	<ul style="list-style-type: none"> <li>• The policy fails to recognise that the discharge of human and animal waste can be acceptable to iwi and the wider community through appropriate treatment and disposal methods. It is inappropriate to require all such discharges be avoided.</li> <li>• The policy seeks to avoid odorous or conspicuous discharges that are objectionable or offensive to takata whenua and the wider community without regard to the nature of the discharge, the receiving environment, and any mitigation.</li> <li>• Community tolerance on whether a discharge is objectionable or offensive is variable. This is too subjective and as such inappropriate.</li> <li>• It does not specify the medium into which odorous or conspicuous discharges are to be avoided, for example whether it relates to discharges to air and/or to water.</li> </ul>
169	Management of adverse effects	Policy 4.5.2 - Applying an adaptive management approach	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate to recognise and enable the use of adaptive management regimes in dealing with adverse effects from activities.
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend policy as follows: "Enable offsetting of adverse effects on indigenous biodiversity values, <del>only</del> <u>including</u> when: ..."	<ul style="list-style-type: none"> <li>• It is useful to enable offsetting in certain situations.</li> <li>• It is unclear why the ability to offset adverse effects on indigenous biodiversity has been limited to activities with a functional necessity to locate in areas of significant biodiversity.</li> <li>• Alliance seeks to broaden the opportunities to consider offsetting.</li> </ul>
176	Management of adverse effects	Policy 4.5.9 - Offsetting for air quality	Amend	Amend policy as follows: "Provide for offsetting of adverse effects of discharges to air on ambient air quality, <del>only</del> <u>including</u> when:"	<ul style="list-style-type: none"> <li>• It is useful to enable offsetting in certain situations.</li> <li>• It is unclear why the ability to offset adverse effects has been limited to activities with a functional necessity to locate in areas of significant biodiversity.</li> <li>• Alliance seeks to broaden the opportunities to consider offsetting.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Add methods to require that: <ul style="list-style-type: none"> <li>• a region wide landscape/features and natural character assessment to determine areas of outstanding natural character, and outstanding landscape areas and features is carried out; and</li> <li>• a region wide assessment of significant indigenous vegetation and habitats of significant indigenous fauna is carried out.</li> </ul> These assessments could be carried out by the Regional Council, or as a collaborative effort between territorial authorities and the Regional Council.	Alliance considers it important the region's: <ul style="list-style-type: none"> <li>• outstanding natural landscapes and features,</li> <li>• areas of outstanding natural character (including in the coastal environment), and</li> <li>• significant indigenous vegetation and habitats of significant indigenous fauna;</li> </ul> are identified at a regional level.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Whole Regional Policy Statement (general support)	Support	Supported.	<p>Submitter supports the RPS, with some suggested amendments, as it provides appropriate guidance on:</p> <ul style="list-style-type: none"> <li>• The critical contribution of infrastructure and network utility operations to social, economic and cultural wellbeing and to health</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					and safety; <ul style="list-style-type: none"> <li>The technical and operational constraints of RNZ's facilities;</li> <li>The need to avoid "reverse sensitivity" effects on regionally significant network utilities.</li> </ul>
96	Objectives on resilience, health and safety	Objective 3.4 - Good quality infrastructure and services meet community needs	Support	Retain this objective as notified.	RNZ supports the recognition of the importance of good quality local and regional infrastructure.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Retain this policy with the following amendment (or words to similar effect): <u>e) Avoiding issues of land use incompatibility by preventing new activities from taking place in locations where those activities are likely to be sensitive to the effects from regionally or nationally significant infrastructure.</u>	<ul style="list-style-type: none"> <li>Strongly support this policy. The sites of RNZ's facilities were chosen carefully, for a particular combination of geographical, functional and technical reasons. It is appropriate that these functional needs are recognised.</li> <li>It is appropriate that a policy addressing integration of land use should specifically refer to the importance of development and new activities avoiding adverse effects on established infrastructure.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Support	Retain the policy as notified.	RNZ facilities are important to the local community as they provide a lifeline utility in cases of emergency. RNZ supports the recognition of this role.
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend the policy as indicated below: Policy 3.4.3 <del>Designing</del> <u>Provide for</u> lifeline utilities and facilities for essential or emergency services  <del>Design</del> <u>Provide for</u> lifeline utilities, and facilities for essential or emergency services, <del>to</del> <u>by</u> : a) Maintain <u>ing</u> their ability to function to the fullest extent possible, during and after natural hazard events; and b) Tak <del>e</del> <u>ing</u> into account their operational co-dependence with other lifeline utilities and essential services to ensure their effective operation.	<ul style="list-style-type: none"> <li>Support the recognition of the need to design lifeline utilities to ensure their maintenance and effective operation.</li> <li>However, it is also important to fully provide for the maintenance and effective operation of existing lifeline utilities.</li> </ul>
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	Amend a) as follows: "a) <del>Restricting</del> <u>Avoiding</u> the establishment of those activities that may result in reverse sensitivity effects; and..."	<ul style="list-style-type: none"> <li>RNZ supports the recognition of the need to protect lifeline utilities. This is a key issue for RNZ.</li> <li>In particular RNZ supports restricting the establishment of activities which give rise to the potential for reverse sensitivity effects.</li> <li>This policy applies only to the most important of public services: it would be appropriate to require the "avoidance" of activities that could result in reverse sensitivity effects (rather than only "restricting" such activities).</li> </ul>
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Support	Retain the policy as notified.	RNZ supports the policy direction recognising the importance of infrastructure of national or regional significance, such as RNZ's facilities.
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Support	Retain the policy as notified.	<ul style="list-style-type: none"> <li>RNZ supports the protection of infrastructure of national or regional importance.</li> <li>In particular, RNZ supports restricting the establishment of activities which give rise to the potential for reverse sensitivity effects.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Retain this policy with the following addition (or words to similar effect): " <u>e) Avoid the potential for reverse sensitivity effects on established activities.</u> "	<ul style="list-style-type: none"> <li>It is appropriate that this policy make specific reference to avoiding reverse sensitivity effects on established activities.</li> <li>Many rural activities (such as farming or horticulture, as well as infrastructure such as RNZ's facilities) generate effects that may be perceived as sensitive by certain new activities.</li> </ul>
238	Anticipated Environmental Results	AER 3.3 - Otago's infrastructure is safe, efficient and continues to operate through disruptive events	Amend	Add the following indicator: " <u>Lifeline utilities are protected from adverse effects, including from reverse sensitivity effects.</u> "	<ul style="list-style-type: none"> <li>RNZ considers that in order for this AER to be recognised, existing lifeline utilities as well as new infrastructure and lifeline utilities need to be considered.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> <li>The maintenance and effective operation of existing lifeline utilities should be included as an indicator of this AER.</li> </ul>
241	Anticipated Environmental Results	AER 3.6 - Otago's urban areas are compact and maximise the use of existing services and infrastructure	Amend	Retain the AER with the following amendment: "New urban developments are well connected to existing urban areas, services, and infrastructure, <u>while restricting the establishment of activities which give rise to the potential for reverse sensitivity effects.</u> "	RNZ supports the need for development in the region but considers the need to avoid reverse sensitivity effects should be emphasised.
249	Glossaries	Glossary	Support	Retain the definitions of "infrastructure" and "lifeline utilities" as notified.	RNZ supports the inclusion of the definitions of "infrastructure" and "lifeline utilities".
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Amend all references to "radio communication" or "radio communications" to "radiocommunication" or "radiocommunications".	<ul style="list-style-type: none"> <li>The terms "radio communication" and "radiocommunication" are both used.</li> <li>To improve clarity, only one term should be used, preferably "radiocommunications", as it is used in the definition of "Infrastructure" in the glossary.</li> </ul>
286	Objectives on resilience, health and safety	Introduction to Objective 3.5	Amend	Retain Objective 3.5 (p.59) but amend the introduction as follows: "Infrastructure of national and regional significance, including roads, rail, electricity generation and transmission, <del>and</del> telecommunication, <u>and radiocommunication</u> , are a part of a national network, and contribute to the economic and social wellbeing of the nation."	<ul style="list-style-type: none"> <li>RNZ's facilities are of national and regional significance. RNZ supports the direction in Objective 3.5 on managing infrastructure, and the importance of recognising the benefits of such infrastructure.</li> <li>For the avoidance of doubt, the introduction to the objective should also make reference to "radiocommunications".</li> </ul>

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Address the conflict which arises between the importance to the Otago region in having efficient and functioning ports at Dunedin and Port Chalmers, with the need to avoid adverse effects on significant environmental values.	The PRPS is deficient because of its failure to address this conflict.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Support	Retain the policy.	<ul style="list-style-type: none"> <li>These provisions are reasonable in that they seek to avoid "significant" adverse effects on identified values and provide the option for avoiding, remedying or mitigating "other" (i.e. lesser) adverse effects.</li> <li>This approach could be adopted elsewhere, where we have raised specific concerns about the use of the term "avoid" when it applies to any effect.</li> </ul>
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Support	Retain the policy.	<ul style="list-style-type: none"> <li>These provisions are reasonable in that they seek to avoid "significant" adverse effects on identified values and provide the option for avoiding, remedying or mitigating "other" (i.e. lesser) adverse effects.</li> <li>This approach could be adopted elsewhere, where we have raised specific concerns about the use of the term "avoid" when it applies to any effect.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Insert new policy: " <u>The avoidance of adverse effects required by policies 2.2.2, 2.2.4, 2.2.6, 2.2.9 and 2.2.11 does not prohibit any part of the operation or proposed development of activities related to the ports at Port Chalmers and Dunedin with any adverse effects from the ports' operations required to be either avoided, remedied or mitigated.</u> "	<ul style="list-style-type: none"> <li>Any policy which uses the term "avoiding" any effect without clearly specifying when other options can be applied (e.g. remedying or mitigating) provide an absolute prohibition on the specified adverse effect that is to be avoided.</li> <li>There needs to be an ability to overcome the absolute prohibition created by the word "avoiding" so that adverse effects of Port Otago's activities on the protected values can be balanced against the benefit to the community of such activities being carried out</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation	Oppose	[Clarify] Policy 2.2.2 to not prohibit any part of the operation or proposed development of	<ul style="list-style-type: none"> <li>The option to remediate or mitigate adverse effects where required is not sufficiently clear to avoid legal arguments over interpretation.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		and significant habitats of indigenous fauna		activities related to the ports at Port Chalmers and Dunedin.	<ul style="list-style-type: none"> <li>• It is unclear why b) would be necessary to meet RMA S6(e) as other values could presumably be anything.</li> <li>• It is unclear when d) and e) would apply.</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Oppose	[Clarify] Policy 2.2.4 to not prohibit any part of the operation or proposed development of activities related to the ports at Port Chalmers and Dunedin.	<ul style="list-style-type: none"> <li>• This policy is unclear and may potentially create uncertainty for the use and development of the port and related activities within the coastal environment.</li> <li>• It requires the avoidance of adverse effects on the values which contribute to the significance of a natural feature, landscape or seascape but these values and location of the features are not specified.</li> <li>• If "other" values are not contributing to the landscape significance, there is no need to protect them at all.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Oppose	[Clarify] Policy 2.2.6 to not prohibit any part of the operation or proposed development of activities related to the ports at Port Chalmers and Dunedin.	<ul style="list-style-type: none"> <li>• This policy is unclear and may potentially create uncertainty for the use and development of the port and related activities within the coastal environment.</li> <li>• It requires the avoidance of adverse effects on the values which contribute to the significance of a natural feature, landscape or seascape but these values and location of the features are not specified.</li> <li>• If "other" values are not contributing to the landscape significance, there is no need to protect them at all.</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	[Clarify] Policy 2.2.9 to not prohibit any part of the operation or proposed development of activities related to the ports at Port Chalmers and Dunedin.	The option to remediate or mitigate adverse effects where required is not sufficiently clear to avoid legal arguments over interpretation.
52	Highly valued natural resources - the coastal environment	Policy 2.2.10 - Identifying surf breaks of national importance	Support	Retain.	Supportive of the need to recognise the surf breaks of national importance within Otago, as identified in the NZCPS.
53	Highly valued natural resources - the coastal environment	Policy 2.2.11 - Managing surf breaks of national importance	Amend	[Clarify] Policy 2.2.11 to not prohibit any part of the operation or proposed development of activities related to the ports at Port Chalmers and Dunedin.	The option to remediate or mitigate adverse effects where required is not sufficiently clear to avoid legal arguments over interpretation.
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	Add: " c) <u>Recognising the importance to the region of maintaining and developing appropriate infrastructure.</u> "	<ul style="list-style-type: none"> <li>• Supports integrated management.</li> <li>• Policies 2.3.1 and 2.3.4 offer no actual guidance on the balance sought for integrated management of the coastal environment in Otago by providing no hierarchy on the role of the coastal environment as a working port, versus its natural and recreational values.</li> </ul>
63	Natural systems and interdependencies	Policy 2.3.4 - Applying an integrated management approach for the coastal environment	Amend	Add: " c) <u>Recognising the importance to the region of maintaining and developing appropriate infrastructure.</u> "	<ul style="list-style-type: none"> <li>• Supports integrated management.</li> <li>• Policies 2.3.1 and 2.3.4 offer no actual guidance on the balance sought for integrated management of the coastal environment in Otago by providing no hierarchy on the role of the coastal environment as a working port, versus its natural and recreational values.</li> </ul>
65	Chapter B3 - Resilience, health and safety	Chapter B3 - general requests	Amend	<ul style="list-style-type: none"> <li>• Have an objective that makes it clear that it is fundamental to the Otago Region's economy that the Dunedin and Port Chalmers ports are able to properly service the needs of the Otago regional economy.</li> <li>• Have policies that: <ul style="list-style-type: none"> <li>• Make clear the fundamental importance to the Otago Region of the Dunedin and Port Chalmers ports;</li> <li>• Identify the need for the efficient and safe operation of the ports at Dunedin and Port Chalmers, the development of their capacity for</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Continued emphasis on optimising the supply chain makes the availability of a modern, multi-modal port in Otago essential to the economic wellbeing of southern New Zealand.</li> <li>• Port Otago have demonstrated an ability to successfully manage the demands and requirements of dredging and disposal of material, working with and taking account of the environmental values (natural and physical).</li> <li>• The King Salmon decision means that the word "avoid" imposes a prohibition and prevents the adoption of an adaptive management approach.</li> <li>• The challenge is now to enable activities necessary for the operation and development of the ports to be permitted where an appropriate</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>shipping and their connection with other transport modes</p> <ul style="list-style-type: none"> <li>• Require any changes to ports' operations to, where possible, avoid remedy or mitigate adverse effects on the identified environmental values of the coastal environment.</li> <li>• Recognise: <ul style="list-style-type: none"> <li>• The operations of the Dunedin and Port Chalmers ports have the potential to adversely affect the coastal environment;</li> <li>• In appropriate cases, the ports' operator may be authorised to carry out activities that have adverse effects that are otherwise required to be avoided by the plan and, in such cases, approval of the ports' operations requires it to be established that the benefits of the ports operations are greater than the adverse effects caused by them.</li> </ul> </li> </ul>	<p>case can be established that the benefit of such activities outweighs any unavoidable adverse effects.</p>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend as follows: "Infrastructure of national and regional significance is managed <u>and developed</u> in a sustainable way".	The heading does not make clear that the objective relates not just to the management of the existing structure but also to necessary development.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Add a new e) to read " <u>The ports at Port Chalmers and Dunedin</u> ".	<ul style="list-style-type: none"> <li>• Supports the recognition of ports and airports as nationally and regionally significant infrastructure.</li> <li>• The regional and natural significance of the ports at Port Chalmers and Dunedin needs to be specified.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	<p>Amend as follows:</p> <p>" Minimise adverse effects from infrastructure that has national or regional significance, by:</p> <p>a) (...); and</p> <p>b) <u>Recognising that the management and/or development of infrastructure of national and regional significance may have adverse effects that would otherwise be required to be avoided under policies in Chapter 2 of this statement; and</u></p> <p>-b- c) Where it is not possible to avoid locating in the areas listed in (a) above, <u>where possible</u> avoiding significant adverse effects <u>on those values that are protected under policies 2.2.4, 2.2.6, 2.2.9 and 2.2.11 and</u> on those values that contribute to the significant or outstanding nature of those areas; and</p> <p>..."</p>	<ul style="list-style-type: none"> <li>• The King Salmon decision means that the word "avoid" imposes a prohibition on the specified adverse effects that is to be avoided.</li> <li>• There needs to be an ability to overcome that prohibition, so that adverse effects from Port Otago's activities can be balanced against their benefits to the community.</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<ul style="list-style-type: none"> <li>• Include specific reference to the role of the port within the coastal environment.</li> <li>• Include specific reference to the need to protect the port from reverse sensitivity effects.</li> <li>• Add a new g): "<u>Ensuring that the ports at Port Chalmers and Dunedin are able to operate and develop as necessary to meet the present and future needs of the community.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>• Policy too generic to be useful.</li> <li>• Need for specific identification of potential reverse sensitivity effects, such as sensitive land uses near cargo handling activity, or marine farming.</li> <li>• The current policy provides some protection for the status quo but does not recognise that future development may be necessary.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	Make any consequential change required to give effect to the key points outlined in this submission.	No reason given.

### 59 Central Otago Environmental Society

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Did not specify	<ul style="list-style-type: none"> <li>The RPS, and ORC's proposed integrated approach, should rest on an over-arching set of fundamental principles, to which consequential regional and district planning documents, policies and management plans should comply.</li> <li>Strengthen the language of policies to ensure "mitigation" and "off-setting" will not be used to betray those fundamental principles.</li> </ul>	<ul style="list-style-type: none"> <li>Piece-meal rush to intensify land use without consideration of the overall benefits and risks on a catchment or district level has amounted to environmental vandalism.</li> <li>The words "remedying or mitigating" have resulted in unsatisfactory compromises which cumulatively, contribute to the continuing degradation of our natural resources.</li> </ul>
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	<p>Amend to include/explain that "integration" requires the RPS be based on the following fundamental principles:</p> <ul style="list-style-type: none"> <li>Guardianship: All users of land and water accept the responsibilities of guardianship;</li> <li>Sustainable management: The values and life-supporting capacity of Otago's natural and physical resources are recognised, maintained and enhanced.</li> <li>Water - a public resource: To be managed in accordance with sustainability principles:               <ol style="list-style-type: none"> <li>First order priority considerations: the environment, customary uses, community supplies and stock water;</li> <li>Second order priority considerations, including Irrigation, industry, renewable electricity generation, recreation and amenity;</li> </ol> </li> <li>Natural character: The natural character (mauri) of the region's rivers, lakes, streams, wetlands and significant landscapes is preserved and enhanced;</li> <li>Land use: Land management and water use systems are integrated so as to preserve soils and enhance environmental values and water quality;</li> <li>Biodiversity: Flora, fauna (both indigenous and introduced) and their habitats on land and in water bodies are protected and valued;</li> <li>Access: Public access to and along rivers, lakes, waterways and wetlands is maintained and, where appropriate, enhanced.</li> <li>Caution: A precautionary approach is taken when information is uncertain, unreliable or inadequate.</li> </ul>	Provides basis for integrated management plans across districts.
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	<ul style="list-style-type: none"> <li>Define assessment frameworks of desired common values / attributes for water quality, air, soil, ecosystem and biodiversity.</li> <li>Add appendices similar to Schedules 4 to 7.</li> </ul>	Ensures commonality of references and assessments within districts and across district boundaries.
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Remove distinction of "indigenous" when using terms "biodiversity, species and vegetation" except when classified as pests.	Both indigenous and introduced species possess values.
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Support	The RPS and consequential plans must ensure "identification, protection and enhancement".	The words "remedying or mitigating" have resulted in unsatisfactory compromises which cumulatively, contribute to the continuing degradation of our natural resources.
58	Objectives on high quality natural	Objective 2.3 - Natural resource	Amend	Include references to proposed "fundamental	Will serve as a constant reminder of over-arching requirement for

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	resources	systems and their interdependencies are recognised		values" [principles requested for Chapter B2] when considering the management of any one resource.	integration.
65	Chapter B3 - Resilience, health and safety	Chapter B3 - general requests	Support	Support.	No reason given.
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Support	Support.	No reason given.
154	Land management for economic production	Policy suite 4.3 - Sufficient land is managed and protected for economic production	Amend	Add: " <u>The "efficiency" of land use must be assessed against fundamental values and where necessary, an integrated land management plan put in place.</u> ".	Essential if a repeat of what has happened in the Manuherikia Valley is to be avoided.
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Require amenity valued affected by land use change (e.g. trees and shelter belts removed to allow pivot irrigation) be replaced in appropriate spaces.	To restore amenity values and provide for the well-being of stock.
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Amend	Add: " <u>The "efficiency" of land use must be assessed against fundamental values and where necessary, an integrated land management plan put in place.</u> ".	Ensures proposed land use is integrated with other values.
161	Objectives on use and enjoyment of natural and built environment	Objective 4.4 - Otago's communities can make the most of the natural and built resources available for use	Amend	Statement should note fundamental values [principles requested for Chapter B2], specifically water values priorities.	No reason given.
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	Add a new sub-paragraph e) reading " <u>Taking into account fundamental principles and environmental values.</u> ".	Note difference from Policy 4.4.3 which is focused on enhancement.
166	Objectives on use and enjoyment of natural and built environment	Objective 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Support	Support.	No reason given.
169	Management of adverse effects	Policy 4.5.2 - Applying an adaptive management approach	Amend	Identify potential adverse effects in a schedule.	For clarity and public education.
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Oppose	Delete.	<ul style="list-style-type: none"> <li>• Off-setting is a crude tool and in Otago has a poor record.</li> <li>• It takes years to establish whether a project will succeed with a consequent delay of consents.</li> <li>• Too often seen as an "easy" compromise.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Oppose	Delete.	<ul style="list-style-type: none"> <li>• Off-setting is a crude tool and in Otago has a poor record.</li> <li>• It takes years to establish whether a project will succeed with a consequent delay of consents.</li> <li>• Too often seen as an "easy" compromise.</li> </ul>
206	Method 7 - Strategies and Plans (non-RMA)	Method 7.3 - Regional Land Transport Plan	Amend	Add a new method 7.3.5 to promote / encourage transition to electric powered vehicles.	Reduce carbon emissions.
240	Anticipated Environmental Results	AER 3.5 - The use of local renewable energy sources in Otago increases and reliance on fossil fuels decreases	Amend	Add positive measures: <ul style="list-style-type: none"> <li>• Renewable energy: installation of micro-hydro schemes, wind generators and off-grid installations;</li> <li>• Fuel efficiency: establishment and use of improved public transport and local freight services.</li> </ul>	No reason given.
251	Other comments	Implementation	Did not specify	<ul style="list-style-type: none"> <li>• ORC and district councils should begin immediately with the tasks of identifying Otago's resources and creating inventories as recognised by the proposed policies.</li> <li>• ORC should encourage district councils to</li> </ul>	Species loss, land intensification and climate change will not wait upon statutory and bureaucratic processes.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				immediately note the direction and intent of the RPS, and use their powers under the RMA to remedying matters which have been largely ignored or only given lip-service so far.	

### 60 PowerNet Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Overall approach	Whole Regional Policy Statement (general opposition)	Amend	Withdraw the proposed RPS in the event that the amendments sought in the submission are not implemented.	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	Amend as follows: "Ensure that local authorities exercise their functions and powers, to: a) <del>Accord Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,</del> ... d) <del>Ensure Kai Tahu have the prerogative to:</del> <u>Recognise and provide for Kai Tahu to identify their relationship with their ancestral lands, water, sites, wahi tapu and other taoka by:</u> i. <del>Identify their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka;</del> and ii. <del>Determine how best to express that relationship; and</del> e) <del>Ensure Kai Tahu are able to:</del> <u>Have regard to the exercise of kaitiakitaka; and ..."</u>	<ul style="list-style-type: none"> <li>• Maintaining good working relationship with Kai Tahu when dealing with resource management issues is already a requirement inherent within the RMA6(e), 7(a) and 9.</li> <li>• Clause (a) does not appear to have an identified resource management purpose and should be deleted. It is inconsistent with the notification determination which focuses on the extent of effects, not the status of a party.</li> <li>• Clauses (d) and (e) require further amendment to better align with sections 6 and 7 of the RMA.</li> </ul>
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Kai Tahu values, <del>rights and interests and customary resources are sustained.</del> <u>recognised and provided for.</u> "	<ul style="list-style-type: none"> <li>• A requirement to "recognise and provide for" Kai Tahu values will provide a broader framework for the management of these values.</li> <li>• Reference to "rights" should be deleted as the subsequent policies do not provide any further context around what specific "rights" are being referred to.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: a) <del>Protect or restore their natural.</del> <u>Maintain functioning in order to provide for key values;</u> and b) <u>Protect the values of</u> outstanding water bodies and wetlands; and ... <del>e) Retain the range and extent of habitats supported; and</del> f) <u>Maintain or enhance natural character;</u> and g) <del>Protect.</del> <u>Provide for</u> Kai Tahu values; and <del>h) Provide for other cultural values; and</del> ... k) Mitigate the adverse effects of natural hazards, including flooding and erosion; <del>and</del> l) <u>Maintain bank stability, and</u> <u>m) Maintain the ability to use the beds of lakes and rivers for infrastructure and to those providing for the economic, health and safety and social wellbeing of the community.</u>	<ul style="list-style-type: none"> <li>• This policy does not suitably recognise that the use of the region's beds of rivers, lakes and wetlands can also be essential for the social and economic wellbeing of the region.</li> <li>• Elements of this policy (clause (a)) will restrict the use of existing activities within freshwater resources. A hydro generation system alters the natural functioning of a river system so in order to give effect to this policy the removal of such facilities would be required. This is not considered to be appropriate.</li> <li>• Additional minor amendments are also required to ensure this policy is consistent with PowerNet submission on Policy 2.1.1.</li> </ul>



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33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend the policy as follows: "Recognise coastal water values, and manage coastal water, to: ... f) <del>Protect</del> <u>Provide for</u> Kai Tahu values; and ... g) <del>Provide for other cultural values</del> ; and ... j) <u>Maintain the ability to use coastal water for infrastructure and by those providing for the economic, health and safety and social wellbeing of the community.</u> "	This policy does not suitably recognise that the use of coastal water resources can also be essential to the economic and social wellbeing of the region.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend the policy as follows: "Recognise soil values, and manage soils, to: ... g) <del>Protect</del> <u>Provide for</u> Kai Tahu values; and ... h) <del>Provide for other cultural values</del> , and m) <u>Maintain the ability to use soils for infrastructure and by those providing for the economic, health and safety and social wellbeing of the community.</u> "	This policy does not suitably recognise that the use of soil resources can also be essential to the economic and social wellbeing of the region.
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>This policy applies to all ecosystems, indigenous and otherwise, and has no regard to the significance of these ecosystems.</li> <li>As other policies provide for areas of significance this policy is not needed.</li> </ul>
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Support	Retain policy as notified (or similar wording to achieve desired relief).	<ul style="list-style-type: none"> <li>Support criteria in that they are consistent with case law and the National Coastal Policy Statement (NZCPS).</li> <li>Better guidance is needed from the regional authority to ensure local authorities apply the criteria consistently.</li> <li>Within the Otago context, landscape values differ remarkably: a landscape which is deemed to be of outstanding value in the Dunedin City context might not be awarded such a status elsewhere in Otago e.g. Queenstown Lakes.</li> <li>This has presented difficulties and inconsistencies in the current district planning framework: the Lammerlaw Ranges which is host to Trustpower's Mahinerangi wind farm, are deemed to be outstanding in DCC District Plan but not in the CODC District Plan. With respect to Trustpower's wind farm application the Court determined that the site is not outstanding, despite having this overlay applied in DCC District Plan.</li> <li>This is not effective and efficient and as such PowerNet is of the view that District Council's should be guided by an assessment identifying outstanding landscapes and features at the regional level.</li> </ul>
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Amend	Amend as follows: "Otago's significant and highly-valued natural resources are identified, and protected <del>or enhanced</del> <u>from inappropriate use or development.</u> "	This objective is too restrictive and generic in that it seeks to "protect" all of Otago's significant and highly valued natural resources.
42	Highly valued natural resources - indigenous biodiversity	Policy 2.2.1 - Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: "Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna <u>at a regional level</u> ."	PowerNet consider it appropriate that those areas within the region that are significant are identified at the regional level.
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend the policy as follows: "Protect and <u>where appropriate</u> enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding <u>where practicable</u> adverse effects on those values which contribute to the area or habitat being significant; and ...	<ul style="list-style-type: none"> <li>It is appropriate that this policy acknowledges that the "protection" of significant indigenous vegetation and habitats of significant fauna can also be achieved via appropriate mitigation and/or offset strategies.</li> <li>Proposed amendments would provide better certainty as to how the policy is to be applied.</li> </ul>

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				d) <u>Remedying or</u> mitigating where adverse effects cannot be avoided <del>or remediated</del> ; and ..."	
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	<ul style="list-style-type: none"> <li>Amend the policy as follows: "Policy 2.2.3 Identifying outstanding natural features, landscapes and seascapes <u>at the regional level</u>."</li> <li>Consider remove this policy or Policy 2.1.7.</li> <li>Clarify wording</li> </ul>	<ul style="list-style-type: none"> <li>Support criteria in that they are consistent with case law and the National Coastal Policy Statement (NZCPS)</li> <li>Better guidance is needed from the regional authority to ensure local authorities apply the criteria consistently.</li> <li>District Councils should be guided by an assessment identifying outstanding landscapes and features at the regional level.</li> <li>Within the Otago context, landscape values differ remarkably: a landscape which is deemed to be of outstanding value in the Dunedin City context might not be awarded such a status elsewhere in Otago e.g. Queenstown Lakes..</li> <li>Policy 2.2.3 reads essentially as a repeat of Policy 2.1.7.</li> <li>Unclear whether the policy will only apply to "outstanding natural landscapes" and "outstanding natural seascapes"</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Oppose	Delete this policy or amend clause a) as follows: "a) Avoiding <u>significant</u> adverse effects on those values which contribute to the significance of the natural feature, landscape or seascape; and"	<ul style="list-style-type: none"> <li>This policy seeks to combine a number of different resource management issues (section 6(a), 6(b) RMA, and policies 13 and 15 of the NZCPS) and directives, and the result is somewhat confused.</li> <li>Clause a) goes further than part 2 of the Act. It leaves no room to provide for important physical resources such as infrastructure or other activities common in areas of outstanding value.</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Policy 2.2.5 Identifying special amenity landscapes and highly valued natural features <u>at a regional level</u> ."	<ul style="list-style-type: none"> <li>It is appropriate to identify landscapes that have high amenity values.</li> <li>Following a regional wide landscape study, local authorities should be responsible for identifying such areas within their respective Districts.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Oppose	Delete this policy or rewrite to focus more on the maintenance of amenity landscapes.	<ul style="list-style-type: none"> <li>This policy seeks to protect landscapes and features that are not deemed to be "outstanding" in accordance with RMA S6(b).</li> <li>It is appropriate to manage the adverse effects on amenity values, but the focus of this policy should not be to "protect" such landscapes.</li> <li>Avoiding significant adverse effects establishes an inappropriately high threshold test.</li> </ul>
49	Highly valued natural resources - the coastal environment	Policy 2.2.7 - Identifying the landward extent of the coastal environment	Amend	<ul style="list-style-type: none"> <li>Amend to be consistent with Policy 1 of the NZCPS.</li> <li>Insert a map defining the extent of the coastal environment and amend to be consistent with the NZCPS.</li> </ul>	<ul style="list-style-type: none"> <li>This policy is not fully consistent with Policy 1 of the NZCPS.</li> <li>The Otago RPS should be more definitive in identifying the extent of the coastal environment in Otago.</li> </ul>
50	Highly valued natural resources - the coastal environment	Policy 2.2.8 - Identifying areas of high and outstanding natural character in the coastal environment	Amend	<ul style="list-style-type: none"> <li>Amend the policy to read: "Policy 2.2.8 Identifying areas of high and outstanding natural character in the coastal environment <u>at a regional level</u>."</li> <li>Identify at the regional level those areas of outstanding natural character in the coastal environment.</li> </ul>	<ul style="list-style-type: none"> <li>It is appropriate and consistent with the NZCPS to identify areas of outstanding natural character in the coastal environment.</li> <li>This should be undertaken as part of the development of the RPS.</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend clause a) as follows: "a) Avoiding <u>significant</u> adverse effects on those values which contribute to the outstanding natural character of an area; and"	<ul style="list-style-type: none"> <li>This policy is generally consistent with giving effect to policy 13 of the NZCPS.</li> <li>It should seek to avoid adverse effects that are more than minor or non-transitory, as per the discussion on the Supreme Court in the King Salmon case.</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>It is appropriate to identify areas of high valued soil resource.</li> <li>This policy appears to be an unnecessary duplication of the matters contained within Policy 2.1.5.</li> </ul>
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>RMA requirement that the life supporting capacity of the soil resource is sustained, is not the same as requiring its protection and</li> </ul>

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					<p>the avoidance of adverse effects.</p> <ul style="list-style-type: none"> <li>It is not appropriate to apply the management regime established by the NZCPS on outstanding natural character and outstanding natural landscapes within the coastal environment to all resource aspects throughout the Region.</li> <li>The policy repeats Policy 2.1.5, which is better worded as it refers to the maintenance of soil values.</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend this objective so it seeks to achieve the integrated management of the natural and physical resources of the region, including consideration of economic benefits.	<ul style="list-style-type: none"> <li>The policies for this objective all relate to integrated management.</li> <li>The human use and economic benefits from development of natural and physical resources also need to be considered.</li> <li>The current drafting of the objective fails to achieve this as it only refers to natural resource systems.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>The intended purpose or outcome of this policy is not clear.</li> <li>It is inappropriate to try to manage resources in an integrated manner when only focusing on one resource.</li> <li>Given the more specific policies that follow relating to the direction of integrated management on certain resource values Powernet submits that this policy should be deleted.</li> </ul>
63	Natural systems and interdependencies	Policy 2.3.4 - Applying an integrated management approach for the coastal environment	Amend	Amend to recognise that in achieving integrated management the human use and economic values of the resource should also taken into account.	The human use (i.e. economic and community) values of resources should be clearly recognised and provided for in the integrated management of natural and physical resources
65	Chapter B3 - Resilience, health and safety	Chapter B3 - general requests	Amend	<ul style="list-style-type: none"> <li>Insert an additional objective which seeks to " <u>Enable the ongoing operation, use, maintenance and development of renewable energy generation facilities within the Otago Region.</u> "</li> <li>Include new objectives and policies that recognise the benefits of and the need to enable the development of new renewable electricity generation activities.</li> </ul>	<ul style="list-style-type: none"> <li>While a specific objective and policies which relates to energy is supported, Objective 3.6 does not go far enough in giving effect to the National Policy Statement for Renewable Electricity Generation 2011 (NPS REG): it should specifically enable the ongoing operation, use and maintenance as well as the development of renewable energy facilities within the region.</li> <li>Objective 3.6 is inappropriately focussed on the energy needs of Otago and fails to recognise that electricity generation is nationally significant.</li> <li>Chapter 3.6 should also explicitly recognise the benefits that are to be derived from the development and ongoing use of renewable energy generation activities.</li> </ul>
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Revise to make this objective clearer or delete it.	<ul style="list-style-type: none"> <li>This objective is too vague to be effective and meaningful in its implementation.</li> <li>It is not clear what is meant by "environmental constraint".</li> </ul>
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Oppose	Delete Policy 3.1.1.	<ul style="list-style-type: none"> <li>Reference to "environmental constraint" is ambiguous and should be removed.</li> <li>It is not at all clear how this policy will be implemented in practice and what this would mean for developments and activities throughout the region.</li> <li>The weighing of individual policies that provide for development and those that seek protection will ensure that environmental constraints are considered.</li> </ul>
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate to seek to minimise the risk from natural hazards to communities.
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Support	Retain the [policy] as notified (or similar wording to achieve relief).	It is appropriate to identify natural hazards present within the Otago region.
82	Natural hazard risk	Policy 3.2.2 - Assessing natural hazard likelihood	Support	Retain the [policy] as notified (or similar wording to achieve relief).	<ul style="list-style-type: none"> <li>It is appropriate to assess the likelihood of natural hazard events occurring.</li> <li>The method places the onus on the ORC and territorial authorities to</li> </ul>

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					undertake this work: it would be inappropriate for every resource user to have to complete an individual natural hazard assessment.
83	Natural hazard risk	Policy 3.2.3 - Assessing natural hazard consequence	Support	Amend policy to make it clear that the natural hazard assessment will be undertaken at a strategic level.	This assessment should be part of a higher level strategic assessment by the regional council.
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	<ul style="list-style-type: none"> <li>• Insert a new clause at d): "<u>d) The extent to which the activity is functionally required to locate within a natural hazard risk area; and ...</u>"</li> <li>• Consequential renumbering of the subsequent clauses.</li> </ul>	It is necessary to recognise that certain activities, for example hydrogeneration, are necessarily located within areas which would be classified as potentially high natural hazard risk (i.e. river environment, flood events).
96	Objectives on resilience, health and safety	Objective 3.4 - Good quality infrastructure and services meet community needs	Amend	Amend the objective as follows: "Good quality infrastructure and services meets community needs <u>on a local, regional and national scale.</u> "	It is necessary to recognise specifically that certain infrastructure might be required in order to support the wider needs of New Zealand, rather than the needs of Otago as a region or local area only.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Insert new clause e) as follows: " <u>e) Ensuring that land use and development does not result in adverse effects on the operation, use and development of infrastructure.</u> "	<ul style="list-style-type: none"> <li>• For certain infrastructure (i.e. local roads) integration with land use patterns and development is essential.</li> <li>• Certain infrastructure, such as regionally or nationally significant infrastructure, does not require to be so closely integrated with urban areas and development</li> <li>• In some cases the nature of the infrastructure influences the quality and use of the environment surrounding it.</li> <li>• This policy should also seek to ensure that land use development does not result in adverse effects (i.e. reverse sensitivity effects) on certain infrastructure assets.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	<ul style="list-style-type: none"> <li>• Provide for the development of infrastructure where it appropriately manages adverse effects on the environment, and where the development will give rise to benefits on a local, regional or national basis.</li> <li>• Amend policy to refer to the "management of effects arising from the development and use of infrastructure activities".</li> </ul>	<ul style="list-style-type: none"> <li>• Seeking to manage infrastructure activities is not appropriate as this is ultimately driven by commercial, economic, and other imperatives that are not relevant in the context of the RMA.</li> <li>• As drafted this policy provides little guidance in terms of how projects relating to infrastructure will be assessed and considered under the RPS.</li> </ul>
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend this policy to provide for the development and ongoing use and maintenance of lifeline utilities within the region.	<ul style="list-style-type: none"> <li>• Given the status of such facilities as lifeline utilities and the standards required under other legislation (i.e. the Building Act), this policy does not need to ensure they will be developed to withstand natural hazard events.</li> <li>• This policy should seek to recognise the essential nature and benefits that are to be derived from the development and ongoing protection of such "lifeline utilities" within the region.</li> </ul>
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Support	Retain policy as notified (or similar wording to achieve desired relief).	<ul style="list-style-type: none"> <li>• This policy is considered appropriate, subject to the amendments to the definition of lifeline utility.</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend the objective as follows: " <del>Infrastructure of national and regional significance is managed in a sustainable way. The development, use, operation and maintenance of infrastructure of national and regional significance is recognised and provided for.</del> "	<ul style="list-style-type: none"> <li>• This objective is generally supported.</li> <li>• It is not appropriate for the RPS to determine how infrastructure is to be managed as there are commercial, economic and other imperatives that drive the management of such facilities.</li> <li>• It is appropriate for the RPS to enable the development, use, operation and maintenance of infrastructure of national or regional significance.</li> </ul>
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend policy as follows (or similar wording to achieve desired relief): "3.5.1 b) Electricity transmission <u>and distribution</u> infrastructure; ..."	<ul style="list-style-type: none"> <li>• It is appropriate that renewable energy generation facilities are identified as of national and regional significance.</li> <li>• The Policy does not provide for the distribution of electricity, which is a regionally significant activity.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has	Amend	Amend the policy as follows: " <u>Minimise Manage</u> adverse effects from infrastructure that	<ul style="list-style-type: none"> <li>• The proposed management regime is not necessary or appropriate given the strategic importance of national and regional infrastructure</li> </ul>

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		national or regional significance		<p>has national or regional significance <del>that is located in</del> <u>by:</u></p> <p><del>a) Giving preference to avoiding their location in:</del></p> <p>i. Areas of significant indigenous vegetation and significant habitats of indigenous fauna; and</p> <p>ii. Outstanding natural features, landscapes and seascapes; and</p> <p>iii. Areas of outstanding natural character; and</p> <p>iv. Outstanding water bodies or wetlands; and</p> <p><u>By</u></p> <p><del>b) Where it is not possible to avoid locating in the areas listed in a) above, avoiding significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and</del></p> <p><del>c) Avoiding, remedying or mitigating other adverse effects on values; and</del></p> <p><del>d) b) Assessing the significance of adverse effects on those values, as detailed in Schedule 3 taking into account the measures to avoid, remedy or mitigate adverse effects</del></p> <p>; and</p> <p><del>e) c) Considering where appropriate the use of offsetting, or other compensatory measures, for residual adverse effects on indigenous biodiversity that are significant and cannot be otherwise avoided, remedied or mitigated.</del></p>	<p>assets.</p> <ul style="list-style-type: none"> <li>It does not recognise that there are often locational, technical and/or functional constraints to infrastructure location and operation.</li> <li>Where infrastructure development is proposed within any of the identified areas, this policy should require an assessment of the significance of adverse effects on those values as set out in d) taking into account the measures to avoid, remedy or mitigate those effects, and the overall benefits arising from the development.</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Support	Retain policy as notified ( or similar wording to achieve relief).	This policy is supported as it seeks to protect infrastructure.
109	Energy	Policy 3.6.1 - Using existing renewable electricity generation structures and facilities	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>The MfE Implementation Guide for the NPSREG (2011) states that Policy B of the NPSREG reinforces the important contribution existing renewable energy assets make in advancing Government's renewable energy targets. The RPS should recognise the importance of such existing facilities, and enable their ongoing use and upgrading without undue regulatory control and constraint.</li> <li>It is not appropriate to give preference to the development of existing facilities over new structures in different locations.</li> </ul>
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	<p>Amend the policy as follows: "<u>Enable the development of new and</u> protect the generation capacity of <u>existing</u> nationally or regionally significant renewable electricity generation activities, by:</p> <p>...</p> <p>b) <del>Restricting</del> <u>Avoiding</u> the establishment of those activities that may result in reverse sensitivity effects."</p>	<ul style="list-style-type: none"> <li>Support the protection of the generation capacity of existing nationally or regionally significant renewable electricity generation activities.</li> <li>This policy also needs to enable the development of such activities.</li> <li>This would achieve consistency with the NPSREG, which explicitly includes retaining existing renewable energy generation assets and the development of new renewable generation assets (Policy B).</li> </ul>
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate that urban development takes place in a manner which takes into account the existing environment and minimises potential conflicts between incompatible activities.
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Insert the following clause between b) and c): " <u>Avoiding urban development which constrains the ability of regionally significant infrastructure</u>	To effectively manage urban growth conflicts, reverse sensitivity effects should be considered, particularly with respect to the encroachment of incompatible activities around key infrastructure

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				<u>or industry to be developed and used without undue constraint that may arise from adverse effects relating to reverse sensitivity or safety; and</u> "	assets.
130	Hazardous substances and waste	Policy 3.9.1 - Integrating management of hazardous substances and waste	Support	Retain the objective as notified (or similar wording to achieve relief).	Because hazardous substances are managed by a number of different agencies an integrated approach will need to be adopted, taking into consideration the various roles and responsibilities at a national, regional and local level.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Oppose	Delete Policy 3.9.5.	<ul style="list-style-type: none"> <li>It is not clear what implications this policy might have on development throughout the region.</li> <li>Airports, ports, and other infrastructure and industrial activities are listed on the Ministry for the Environment's HAIL list.</li> <li>This policy could be interpreted that facilities that use hazardous substances will become sites of contaminated land and therefore should be avoided.</li> </ul>
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for economic production	Amend	Amend the objective as follows: " <u>Ensure that appropriate rural, commercial and industrial development is enabled to provide for the social, economic and cultural wellbeing of the community.</u> "	<ul style="list-style-type: none"> <li>It is not clear from the objective what is intended to be achieved.</li> <li>The ensuing policies appear to enable the development of rural, commercial and industrial activities, however it is not clear from the drafting of this objective that this is what will be achieved.</li> </ul>
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Support	Retain the [policy] as notified (or similar wording to achieve relief).	It is appropriate to recognise and provide for the development and ongoing use of industrial activities that are essential to the economic and social wellbeing of the region.
166	Objectives on use and enjoyment of natural and built environment	Objective 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Oppose	Amend Objective 4.5 as follows: " <u>Adverse effects arising from the development use of Otago's natural and physical resources are avoided, remedied or mitigated - of using and enjoying Otago's natural and built environment are minimised.</u> "	<ul style="list-style-type: none"> <li>Reference to enjoyment is vague and subjective.</li> <li>The objective should relate to the development and use of Otago's natural and physical resources.</li> <li>It should also seek to avoid, remedy or mitigate adverse effects on such resources.</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend policy as follows: "Enable offsetting of adverse effects on indigenous biodiversity values, <del>only</del> <u>including</u> when: ...."	<ul style="list-style-type: none"> <li>It is useful to enable offsetting in certain situations.</li> <li>It is unclear why the ability to offset adverse effects on indigenous biodiversity has been limited to activities with a functional necessity to locate in areas of significant biodiversity.</li> <li>PowerNet seeks to broaden the opportunities to consider offsetting.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Add methods to require that: <ul style="list-style-type: none"> <li>a region wide landscape/features and natural character assessment to determine areas of outstanding natural character, and outstanding landscape areas and features is carried out; and</li> <li>a region wide assessment of significant indigenous vegetation and habitats of significant indigenous fauna is carried out.</li> </ul> These assessments could be carried out by the Regional Council, or as a collaborative effort between territorial authorities and the Regional Council.	PowerNet considers it important the region's: <ul style="list-style-type: none"> <li>outstanding natural landscapes and features,</li> <li>areas of outstanding natural character (including in the coastal environment), and</li> <li>significant indigenous vegetation and habitats of significant indigenous fauna</li> </ul> are identified at a regional level.
249	Glossaries	Glossary	Amend	Lifeline utilities - amend the definition of "lifeline utilities" to specifically refer to the infrastructure, buildings, ancillary equipment and activities that are undertaken by the entities referred to in the Civil Defence Emergency Act.	<ul style="list-style-type: none"> <li>Support the inclusion of "lifeline utilities" as part of the RPS.</li> <li>The definition contained within the Civil Defence Emergency Management Act refers to entities rather than facilities.</li> </ul>

### 61 HW Richardson Group Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Overall approach	Whole Regional Policy Statement (general opposition)	Amend	Withdraw the proposed RPS in the event that the amendments sought in the submission are not implemented.	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	Amend as follows: "Ensure that local authorities exercise their functions and powers, to: a) <del>Accord Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner, and,</del> ... d) <del>Ensure Kai Tahu have the prerogative to:</del> <u>Recognise and provide for Kai Tahu to identify their relationship with their ancestral lands, water, sites, wahi tapu and other taoka by:</u> i. <del>Identify their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and</del> ii. <del>Determine how best to express that relationship; and</del> e) <del>Ensure Kai Tahu are able to</del> <u>Have regard to the exercise of kaitiakitaka; and ..."</u>	<ul style="list-style-type: none"> <li>• Maintaining good working relationship with Kai Tahu when dealing with resource management issues is already a requirement inherent within the RMA6(e), 7(a) and 9.</li> <li>• Clause (a) does not appear to have an identified resource management purpose and should be deleted. It is inconsistent with the notification determination which focuses on the extent of effects, not the status of a party.</li> <li>• Clauses (d) and (e) require further amendment to better align with sections 6 and 7 of the RMA.</li> </ul>
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Kai Tahu values, <del>rights and</del> interests and customary resources are <del>sustained</del> <u>recognised and provided for.</u> "	<ul style="list-style-type: none"> <li>• A requirement to "recognise and provide for" Kai Tahu values will provide a broader framework for the management of these values.</li> <li>• Reference to "rights" should be deleted as the subsequent policies do not provide any further context around what specific "rights" are being referred to.</li> </ul>
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Support	Maintain objective as notified.	Concerned about how this objective will be applied in practice. For this objective to be useful it needs to be supported by additional policies that recognise, maintain and enhance physical resources.
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Include additional policies that recognise, maintain and enhance physical resources	Current policies are insufficient to achieve Objective 2.1 as they only address natural values and not physical values.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend the policy as follows: "Recognise soil values, and manage soils, to: ... g) <del>Protect</del> <u>Provide for</u> Kai Tahu values; and ... <del>h) Provide for other cultural values, and</del> <del>m) Maintain the ability to use soils for infrastructure and by those providing for the economic, health and safety and social wellbeing of the community.</del> "	This policy does not suitably recognise that the use of soil resources can also be essential to the economic and social wellbeing of the region.
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>• This policy applies to all ecosystems, indigenous and otherwise, and has no regard to the significance of these ecosystems.</li> <li>• As other policies provide for areas of significance this policy is not needed.</li> </ul>
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Amend	Amend as follows: "Otago's significant and highly-valued natural resources are identified, and protected <del>or enhanced</del> <u>from inappropriate use or development.</u> "	This objective is too restrictive and generic in that it seeks to "protect" all of Otago's significant and highly valued natural resources.
42	Highly valued natural resources - indigenous biodiversity	Policy 2.2.1 - Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: "Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna <u>at a regional level</u> ."	HWRG consider it appropriate that those areas within the region that are significant are identified at the regional level.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend the policy as follows: "Protect and <u>where appropriate</u> enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding <u>where practicable</u> adverse effects on those values which contribute to the area or habitat being significant; and ... d) <u>Remedying or mitigating</u> where adverse effects cannot be avoided <del>or remediated</del> ; and ..."	<ul style="list-style-type: none"> <li>It is appropriate that this policy acknowledges that the "protection" of significant indigenous vegetation and habitats of significant fauna can also be achieved via appropriate mitigation and/or offset strategies.</li> <li>Proposed amendments would provide better certainty as to how the policy is to be applied.</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	<ul style="list-style-type: none"> <li>Amend the policy as follows: "Policy 2.2.3 Identifying outstanding natural features, landscapes and seascapes <u>at the regional level</u>."</li> <li>Consider remove this policy or Policy 2.1.7.</li> <li>Clarify wording</li> </ul>	<ul style="list-style-type: none"> <li>Support criteria in that they are consistent with case law and the National Coastal Policy Statement (NZCPS)</li> <li>Better guidance is needed from the regional authority to ensure local authorities apply the criteria consistently.</li> <li>District Councils should be guided by an assessment identifying outstanding landscapes and features at the regional level.</li> <li>Within the Otago context, landscape values differ remarkably: a landscape which is deemed to be of outstanding value in the Dunedin City context might not be awarded such a status elsewhere in Otago e.g. Queenstown Lakes..</li> <li>Policy 2.2.3 reads essentially as a repeat of Policy 2.1.7.</li> <li>Unclear whether the policy will only apply to "outstanding natural landscapes" and "outstanding natural seascapes"</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Oppose	Delete this policy or amend clause a) as follows: "a) Avoiding <u>significant</u> adverse effects on those values which contribute to the significance of the natural feature, landscape or seascape; and"	<ul style="list-style-type: none"> <li>This policy seeks to combine a number of different resource management issues (section 6(a), 6(b) RMA, and policies 13 and 15 of the NZCPS) and directives, and the result is somewhat confused.</li> <li>Clause a) goes further than part 2 of the Act. It leaves no room to provide for important physical resources such as infrastructure or other activities common in areas of outstanding value.</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Policy 2.2.5 Identifying special amenity landscapes and highly valued natural features <u>at a regional level</u> ."	<ul style="list-style-type: none"> <li>It is appropriate to identify landscapes that have high amenity values.</li> <li>Following a regional wide landscape study, local authorities should be responsible for identifying such areas within their respective Districts.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Oppose	Delete this policy or rewrite to focus more on the maintenance of amenity landscapes.	<ul style="list-style-type: none"> <li>This policy seeks to protect landscapes and features that are not deemed to be "outstanding" in accordance with RMA S6(b).</li> <li>It is appropriate to manage the adverse effects on amenity values, but the focus of this policy should not be to "protect" such landscapes.</li> <li>Avoiding significant adverse effects establishes an inappropriately high threshold test.</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>It is appropriate to identify areas of high valued soil resource.</li> <li>This policy appears to be an unnecessary duplication of the matters contained within Policy 2.1.5.</li> </ul>
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>RMA requirement that the life supporting capacity of the soil resource is sustained, is not the same as requiring its protection and the avoidance of adverse effects.</li> <li>It is not appropriate to apply the management regime established by the NZCPS on outstanding natural character and outstanding natural landscapes within the coastal environment to all resource aspects throughout the Region.</li> <li>The policy repeats Policy 2.1.5, which is better worded as it refers to the maintenance of soil values.</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are	Amend	Amend this objective so it seeks to achieve the integrated management of the natural and physical resources of the region, including	<ul style="list-style-type: none"> <li>The policies for this objective all relate to integrated management.</li> <li>The human use and economic benefits from development of natural and physical resources also need to be considered.</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		recognised		consideration of human use and economic benefits.	<ul style="list-style-type: none"> <li>The current drafting of the objective fails to achieve this as it refers only to natural resource systems.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>The intended purpose or outcome of this policy is not clear.</li> <li>It is inappropriate to try to manage resources in an integrated manner when only focusing on one resource.</li> <li>Given the more specific policies that follow relating to the direction of integrated management on certain resource values HWRG submits that this policy should be deleted.</li> </ul>
62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Amend	Amend to recognise that in achieving integrated management the human use and economic values of the resource are also taken into account.	<ul style="list-style-type: none"> <li>This directive is probably derived from the NPS for Freshwater.</li> <li>The Proposed RPS provides no further guidance as to how 'freshwater objectives' are to developed, what matters should be considered and how they should be applied at the regional level.</li> <li>More detailed and transparent guidance on these freshwater objectives is required if the obligations inherent within the NPS for Freshwater are to be achieved.</li> <li>The human use (i.e. economic and community) values of resources should be clearly recognised and provided for in the integrated management of natural and physical resources</li> </ul>
63	Natural systems and interdependencies	Policy 2.3.4 - Applying an integrated management approach for the coastal environment	Amend	Amend to recognise that in achieving integrated management the human use and economic values of the resource are also taken into account.	The human use (i.e. economic and community) values of resources should be clearly recognised and provided for in the integrated management of natural and physical resources
64	Natural systems and interdependencies	Policy 2.3.5 - Applying an integrated management approach for airsheds	Amend	Amend to recognise that in achieving integrated management the human use and economic values of the resource are also taken into account.	The human use (i.e. economic and community) values of resources should be clearly recognised and provided for in the integrated management of natural and physical resources
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend objective to make clearer or delete it.	<ul style="list-style-type: none"> <li>This objective is too vague to be effective and meaningful in its implementation.</li> <li>It is not clear what is meant by "environmental constraint".</li> </ul>
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Oppose	Delete Policy 3.1.1.	<ul style="list-style-type: none"> <li>Reference to "environmental constraint" is ambiguous and should be removed.</li> <li>It is not at all clear how this policy will be implemented in practice and what this would mean for developments and activities throughout the region.</li> <li>The weighing of individual policies that provide for development and those that seek protection will ensure that environmental constraints are considered.</li> </ul>
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate to seek to minimise the risk from natural hazards to communities.
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Support	Retain the policy as notified (or similar wording to achieve relief).	It is appropriate to identify natural hazards present within the Otago region.
82	Natural hazard risk	Policy 3.2.2 - Assessing natural hazard likelihood	Support	Retain the policy as notified (or similar wording to achieve relief).	<ul style="list-style-type: none"> <li>It is appropriate to assess the likelihood of natural hazard events occurring.</li> <li>The method places the onus on the ORC and territorial authorities to undertake this work: it would be inappropriate for every resource user to have to complete an individual natural hazard assessment.</li> </ul>
83	Natural hazard risk	Policy 3.2.3 - Assessing natural hazard consequence	Support	Amend policy to make it clear that this natural hazard assessment will be undertaken at a strategic level.	This assessment should be part of a higher level strategic assessment by the regional council.
96	Objectives on resilience, health and safety	Objective 3.4 - Good quality infrastructure and services meet community needs	Amend	Amend the objective as follows: "Good quality infrastructure and services meets community needs on a local, regional and national scale."	It is necessary to recognise specifically that certain infrastructure might be required in order to support the wider needs of New Zealand, rather than the needs of Otago as a region or local area only.
99	Infrastructure - general	Policy 3.4.2 - Managing	Amend	<ul style="list-style-type: none"> <li>Provide for the development of infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>Seeking to manage infrastructure activities is not appropriate as this</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		infrastructure activities		where it appropriately manages adverse effects on the environment, and where the development will give rise to benefits on a local, regional or national basis. • Amend policy to refer to the "management of effects arising from the development and use of infrastructure activities".	is ultimately driven by commercial, economic, and other imperatives that are not relevant in the context of the RMA. • As drafted this policy provides little guidance in terms of how projects relating to infrastructure will be assessed and considered under the RPS.
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend the objective as follows: " <del>Infrastructure of national and regional significance is managed in a sustainable way. The development, use, operation and maintenance of infrastructure of national and regional significance is recognised and provided for.</del> "	• This objective is generally supported. • It is not appropriate for the RPS to determine how infrastructure is to be managed as there are commercial, economic and other imperatives that drive the management of such facilities. • It is appropriate for the RPS to enable the development, use, operation and maintenance of infrastructure of national or regional significance.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate that regionally significant infrastructure including renewable energy generation facilities are identified as of national and regional significance.
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend the policy as follows: " <del>Minimise Manage</del> adverse effects from infrastructure that has national or regional significance <u>that is located in</u> -by: a) <del>Giving preference to avoiding their location in:</del> i. Areas of significant indigenous vegetation and significant habitats of indigenous fauna; and ii. Outstanding natural features, landscapes and seascapes; and iii. Areas of outstanding natural character; and iv. Outstanding water bodies or wetlands; and <u>By</u> -b) <del>Where it is not possible to avoid locating in the areas listed in a) above, avoiding significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and</del> c) <del>Avoiding, remedying or mitigating other adverse effects on values; and</del> -d) <u>b) Assessing the significance of adverse effects on those values, as detailed in Schedule 3 taking into account the measures to avoid, remedy or mitigate adverse effects</u> ; and -e) <u>c) Considering where appropriate the use of offsetting, or other compensatory measures, for residual adverse effects on indigenous biodiversity that are significant and cannot be otherwise avoided, remedied or mitigated.</u>	• The proposed management regime is not necessary or appropriate given the strategic importance of national and regional infrastructure assets. • It does not recognise that there are often locational, technical and/or functional constraints to infrastructure location and operation. • Where infrastructure development is proposed within any of the identified areas, this policy should require an assessment of the significance of adverse effects on those values as set out in d) taking into account the measures to avoid, remedy or mitigate those effects, and the overall benefits arising from the development.
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Support	Retain policy as notified ( or similar wording to achieve relief).	This policy is supported as it seeks to protect infrastructure.
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate that urban development takes place in a manner which takes into account the existing environment and minimises potential conflicts between incompatible activities.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
130	Hazardous substances and waste	Policy 3.9.1 - Integrating management of hazardous substances and waste	Support	Retain the policy as notified (or similar wording to achieve relief).	Because hazardous substances are managed by a number of different agencies an integrated approach will need to be adopted, taking into consideration the various roles and responsibilities at a national, regional and local level.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Oppose	Delete Policy 3.9.5.	<ul style="list-style-type: none"> <li>It is not clear what implications this policy might have on development throughout the region.</li> <li>Airports, ports, and other infrastructure and industrial activities are listed on the Ministry for the Environment's HAL list.</li> <li>This policy could be interpreted that facilities that use hazardous substances will become sites of contaminated land and therefore should be avoided.</li> </ul>
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for economic production	Amend	Amend the objective as follows: " <u>Ensure that appropriate rural, commercial and industrial development is enabled to provide for the social, economic and cultural wellbeing of the community.</u> "	<ul style="list-style-type: none"> <li>It is not clear from the objective what is intended to be achieved.</li> <li>The ensuing policies appear to enable the development of rural, commercial and industrial activities, however it is not clear from the drafting of this objective that this is what will be achieved.</li> </ul>
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate to recognise and provide for the development and ongoing use of industrial activities that are essential to the economic and social wellbeing of the region.
166	Objectives on use and enjoyment of natural and built environment	Objective 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Oppose	Amend Objective 4.5 as follows: "Adverse effects <u>arising from the development use of Otago's natural and physical resources are avoided, remedied or mitigated</u> -of using and enjoying Otago's natural and built environment are minimised."	<ul style="list-style-type: none"> <li>Reference to enjoyment is vague and subjective.</li> <li>The objective should relate to the development and use of Otago's natural and physical resources.</li> <li>It should also seek to avoid, remedy or mitigate adverse effects on such resources.</li> </ul>
169	Management of adverse effects	Policy 4.5.2 - Applying an adaptive management approach	Support	Retain the policy as notified (or similar wording to achieve relief).	It is appropriate to recognise and enable the use of adaptive management regimes in dealing with adverse effects from activities.
176	Management of adverse effects	Policy 4.5.9 - Offsetting for air quality	Support	Support in part - amend policy as follows: Provide for offsetting of adverse effects of discharges to air on ambient air quality, <del>only</del> including when:	Broaden the opportunities to consider offsetting.
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Add methods to require that: <ul style="list-style-type: none"> <li>a region wide landscape/features and natural character assessment to determine areas of outstanding natural character, and outstanding landscape areas and features is carried out; and</li> <li>a region wide assessment of significant indigenous vegetation and habitats of significant indigenous fauna is carried out.</li> </ul> These assessments could be carried out by the Regional Council, or as a collaborative effort between territorial authorities and the Regional Council.	HWRG considers it important the region's: <ul style="list-style-type: none"> <li>outstanding natural landscapes and features,</li> <li>areas of outstanding natural character (including in the coastal environment), and</li> <li>significant indigenous vegetation and habitats of significant indigenous fauna are identified at a regional level.</li> </ul>

### 62 Lev Lafayette

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
257	Matters beyond scope	Beyond the scope - general	Not Applicable	Suggest that the Council investigate the effects of switching from a net value rating systems (capital improved plus site value) to one which is based on site value alone.	Will lead to greater growth in employment, a smaller environmental footprint, and an improvement in the quality and quantity of housing and improved property.

### 63 Yellow-eyed Penguin Trust

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement	Amend	Use of phrase "precautionary approach" could	The phrase is used in Policy 3.2.8 in relation to natural hazards,

Ref	Issue	Provision (overall approach)	Position	Decision Requested be adopted more widely in RPS.	Reason for Decision Requested however it could be applied in other sections of the RPS, e.g. applying a precautionary or conservative approach to the management of ecosystem and indigenous biodiversity values (Policy 2.1.6).
4	Overall approach	Introduction - RPS framework	Amend	<ul style="list-style-type: none"> <li>• P. 11 - "Otago has high quality natural resources and ecosystems". Add reference to "resilience" in the assertion that "Society relies heavily on the systems and services of the natural environment".</li> </ul>	<ul style="list-style-type: none"> <li>• Support the assertion that "Society relies heavily on the systems and services of the natural environment"</li> <li>• We should be seeking to strengthen the natural environment to withstand shocks of various kinds such as climate change.</li> <li>• Support the approach of enabling people "to use and enjoy our natural and built environment"(...)"while ensuring that resources are sustained".</li> </ul>
7	Chapter B1 - Kai Tahu values	Chapter B1 - general requests	Did not specify	That ORC engage with Kai Tahu to enhance resources both for cultural wellbeing and economic benefit.	<ul style="list-style-type: none"> <li>• Submitter has real issues with the reality of "healthy functioning environments" in the 21st century: the Otago coast has experienced a massive loss of biodiversity since 1300 and 1840. Much has been lost to extinction while significant remnants persist.</li> <li>• The aspirations of both Kai Tahu and the desires of the wider community for conservation and enhancement of Otago's coastal biodiversity can be met.</li> </ul>
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Support	Support.	Objective is supported.
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	Identify the tools or strategies to managing natural resources with regard to primary production and tourism.	The text (p. 23) identifies the importance of Otago's natural resources for driving two of the region's most important sectors but not the tools or strategies required to achieve them.
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Support	Support.	The issue accurately describes the possible economic effects of resource degradation: Nature-based tourism relying primarily on yellow-eyed penguin on Otago Peninsula returns \$100 million annually to the Dunedin economy, according to estimates (Pr. Clem Tisdell, University of Queensland, 2007).
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Support	Support but define healthy ecosystems clearly.	<ul style="list-style-type: none"> <li>• Support objective to "support healthy ecosystems".</li> <li>• Supports the maintenance or enhancement of good water quality in the coastal marine area.</li> <li>• Appreciate ORC's recognition of their responsibilities in the coastal marine area.</li> </ul>
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend values a) to i) to prioritise healthy habitats and ecosystems.	<ul style="list-style-type: none"> <li>• Values a) to i) appear to have equal ranking.</li> <li>• Healthy habitats and ecosystems are the basis on which all of the other values depend and therefore should have priority.</li> <li>• It is particularly encouraging to see that coastal values are not just to be maintained but also enhanced.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend policy to specifically support enhancement through re-establishment of seabird colonies on the Otago coast.	<ul style="list-style-type: none"> <li>• Strongly support this policy as important and valuable section, with elements, such as c), meeting ecological best practise.</li> <li>• Important maintenance and enhancement of indigenous species not exclusive as many indigenous species and ecosystems now dependent on some exotic species.</li> <li>• To develop areas which support a range and diversity of seabird species - Other NGOs and Kai Tahu also have an interest in this.</li> </ul>
39	Natural resource value management - general	Policy 2.1.8 - Recognising the values of natural character in the coastal environment	Support	Support.	Recognises the value of wild and scenic coastlines for both wildlife and the visitor experience. The conservation work of the Trust at sites such as Okia Reserve (Otago Peninsula) have assisted in restoring natural character.
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Add an equivalent policy to directly recognise and protect rare and threatened indigenous species.	The policy addresses impacts on significant habitat and vegetation only, with no direct recognition of significant species. For example Yellow Eyed Penguin range across large areas of the coast, and are subject to a multitude of impacts across that range. However, it is unlikely that most or all of their range will be classified as "significant

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
143	Objectives on use and enjoyment of natural and built environment	PRAs and explanations - Use and enjoyment of natural and built environment	Amend	Include reference to the precautionary principle in the explanatory text at the start of Chapter 4.	habitat". The application of the precautionary approach would sit well in this section.
172	Management of adverse effects	Policy 4.5.5 - Controlling the introduction and spread of pest plants and animals	Support	Support policy. That it drives a change to Water Plan Rule 12.B.1.2 relating to the use of pesticides in Regionally Significant Wetlands.	<ul style="list-style-type: none"> <li>• This is an important policy: pest species may place additional and often unsustainable pressures on vulnerable coastal species, such as the yellow-eyed penguin.</li> <li>• Hope this policy will drive a change to the Water Plan's Rule 12.B.1.2, which prevents the use of pesticides in Regionally Significant Wetlands where the pesticide could cause "damage to fauna", while pest control is essential to retain the values that make a wetland regionally significant.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Support	Support.	<ul style="list-style-type: none"> <li>• To identify both indigenous vegetation and habitat as in many cases they are not the same, for example yellow-eyed penguins nesting in exotic gorse.</li> <li>• Penguins' areas of foraging habitat at sea must also be identified.</li> </ul>
200	Method 6 - Research, Monitoring and Reporting	Method 6.3 - State of Environment Reporting	Amend	Specify the time intervals over which reporting is to be carried out. Would support an interval of 5 years.	This is an important means of feedback and will supply crucial information on the effectiveness or otherwise of policies identified in this submission.
207	Method 7 - Strategies and Plans (non-RMA)	Method 7.4 - Pest management strategy	Support	Support: <ul style="list-style-type: none"> <li>• The emphasis put on having regard to indigenous biodiversity values when preparing a plan;</li> <li>• Prioritisation and taking into account any local biodiversity strategies.</li> </ul>	<ul style="list-style-type: none"> <li>• Pest management is a significant part of any indigenous vegetation restoration or species recovery strategy, especially at mainland sites.</li> <li>• Conservation NGOs are shouldering more of the conservation load and recognising and supporting their biodiversity work is appreciated..</li> </ul>
222	Method 11 - Advocacy and Facilitation	Method 11.2 - Facilitation	Amend	Clarify what is meant by facilitation.	<ul style="list-style-type: none"> <li>• Facilitation, especially those sections dealing with achieving key biodiversity objectives, is admirable.</li> <li>• More clarification around what is meant by facilitation is needed, for example monetary support, support in kind, assistance with consenting, or something else?</li> <li>• Unless this is further defined or explained then it is unlikely to be successful.</li> </ul>
255	Other comments	Introduction - Overview and the Otago Region	Support	Support.	<ul style="list-style-type: none"> <li>• Strongly endorse the statement that "A thriving and healthy natural environment is vital to sustaining our wellbeing" (page 3).</li> <li>• This is a significant challenge and requires a sea change in accepted attitudes and practises.</li> </ul>
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Support	Support.	Chairman's foreword: The comment "and be proud to pass on to those who come after us" nicely encapsulates the current challenge of resource management and the need to hand on to future communities healthy and functioning ecosystems that are the foundations of a prosperous Otago.
262	Objectives on Kai Tahu values	Need 1.2	Support	Support.	<ul style="list-style-type: none"> <li>• Submitter supports Objective 1.2, but concerned with the comment (Need under Objective 1.2 p. 16): "In managing our natural resources, local authorities need to recognise Kai Tahu values and plans and enable the exercise of customary rights".</li> <li>• Without extensive investment by the ORC, territorial authorities, Kai Tahu and community conservation groups in particular in enhancing coastal biodiversity, there will not be any or sufficient natural resources that customary rights can be exercised over.</li> </ul>
266	Objectives on high quality natural resources	Need 2.1	Amend	Amend to identify the tools, mechanisms, and policies that can reverse this degradation.	To know more about the values and their characteristics misses the point.
271	Objectives on high quality natural resources	Introduction to Objective 2.3	Support	Support narrative associated with Objective 2.3	This is a good discussion of the difficulties in managing interconnected natural resource systems, particularly the coastal environment.
275	Objectives on resilience, health	Need 3.3	Amend	Amend "Need" under Objective 3.3 as follows:	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	and safety			"We need to have consistent guidance on sea level rise, <u>and other effects of climate change</u> , and managing for adverse effects that will occur beyond the life of this RPS."	
297	Objectives on use and enjoyment of natural and built environment	Introduction to Objective 4.1	Support	Support the statement: "enhancing access to the natural environment brings recreational, cultural, spiritual and economic wellbeing."	Based on trips with visitors to reserves, the simple experience of viewing penguins on their nesting grounds is both uplifting and rejuvenating.

#### 64 Hampden Community Energy Inc

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
65	Chapter B3 - Resilience, health and safety	Chapter B3 - general requests	Amend	Ensure there is strong policy which will make Otago's communities more secure, self-reliant, vibrant and better prepared to manage the effects of climate change and the decline in fossil fuel availability and meet the essential needs of those who follow us in time.	<ul style="list-style-type: none"> <li>• There will be a growing need for viable rural communities as resource limits impinge and the need for local food and fibre production grows again.</li> <li>• Reducing oil/energy dependence and carbon emissions generally, reviving the local economy and strengthening the local skills base are fundamental to achieving greater self-reliance within the Hampden/Moeraki area.</li> <li>• The pending decline in the availability of cheap fuel will initially mainly affect mobility and the cost of producing food.</li> <li>• We also recognise we are part of a network of rural communities and that network needs to be strengthened to meet the needs of an uncertain future.</li> <li>• More support is needed for sustaining, building and diversifying economic activity in rural communities throughout Otago.</li> </ul>
65	Chapter B3 - Resilience, health and safety	Chapter B3 - general requests	Amend	Ensure there is strong policy which achieves radical reductions in carbon emissions, diversifies energy use in the economy and which re-captures carbon already in the atmosphere, such as by re-vegetation and building soils.	<ul style="list-style-type: none"> <li>• Urgent corrective action against climate change is required and effective change will only be achieved if each one of us (including businesses) participates in reducing our carbon footprint.</li> <li>• Reducing oil/energy dependence and carbon emissions generally, reviving the local economy and strengthening the local skills base are fundamental to achieving greater self-reliance within the Hampden/Moeraki area.</li> </ul>
114	Energy	Policy 3.6.6 - Reducing long term demand for fossil fuels	Amend	<ul style="list-style-type: none"> <li>• Ensure there is strong policy to make non-carbon based transport and public transport more attractive and practical alternatives in towns and across the district, including the reinstatement of bus shelters at strategic rural locations.</li> <li>• Incentives to encourage the required changes in behaviour should be introduced asap.</li> </ul>	<ul style="list-style-type: none"> <li>• One of the ways we can reduce our carbon footprint is to use transport alternatives to the petrol private vehicle.</li> <li>• We need a backup to the private vehicle that means the community can continue to function should fuel access become difficult.</li> <li>• Reducing oil/energy dependence and carbon emissions generally, reviving the local economy and strengthening the local skills base are fundamental to achieving greater self-reliance within the Hampden/Moeraki area.</li> <li>• The pending decline in the availability of cheap fuel will initially mainly affect mobility and the cost of producing food.</li> </ul>

#### 65 Patricia Scott

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
93	Climate change	Policy suite 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Amend	Address mitigation of climate change separately from adaptation, including by: <ul style="list-style-type: none"> <li>• Reducing ORC's own carbon emissions;</li> <li>• Assisting communities in reducing their carbon emissions through good public transport and reducing car use;</li> <li>• Discouraging exploration for fossil fuels;</li> <li>• Preventing the burning of coal;</li> <li>• Urging central government to take a stronger stance on mitigating climate change.</li> </ul>	<ul style="list-style-type: none"> <li>• Although ORC recognises the importance and severity of climate change, mitigation is not dealt with in any detail.</li> <li>• ORC ought to be doing all it can to prevent climate change happening or reduce the severity of its effects.</li> <li>• Mitigation requires quite different actions from adaptation: those 2 aspects should be treated separately.</li> <li>• If mitigation and adaptation are seen as alternatives we condemn ourselves to much more severe effects of climate.</li> <li>• Preventing the burning of coal would also reduce particulate emissions.</li> </ul>
93	Climate change	Policy suite 3.3 - Otago's	Support	No decision requested.	Support taking a precautionary approach.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		communities are prepared for and able to adapt to the effects of climate change			

### 66 Peter Hore

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Amend	Amend Policy 4.3.2 as follows: "Managing land use change in dry catchments Manage land use change in dry catchments, to minimise any significant reduction in water yield, by: <u>(a) Supporting and encouraging pest control for pest species which may adversely affect water yield.</u> <del>a) Restricting any extension of forestry activities within those catchments that would result in a significant reduction in water yield, including cumulative reductions; and</del> b) Minimising the conversion of tussock grasslands to species which are less able to capture and hold precipitation."	No reason given.

### 67 Peter Foster

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
7	Chapter B1 - Kai Tahu values	Chapter B1 - general requests	Oppose	<ul style="list-style-type: none"> <li>Ngai Tahu should have no rights in respect to landscape management.</li> <li>Ngai Tahu should not be given any form of political priority in terms of notice or influence on the ORC</li> <li>Ngai Tahu should not be spelled in Southern dialect.</li> </ul>	<ul style="list-style-type: none"> <li>The Treaty of Waitangi never envisaged partnership. That is a political judgement made only a few decades ago.</li> <li>Ngai Tahu are not the only tribe in Otago. Why are other older tribes not included?</li> <li>Ngai Tahu invaded Otago in relatively recent times. They would know nothing of the original landscape, and so there is no justification for political influence on landscapes.</li> <li>Today's Maori people have little genetic connection to their Maori ancestors. This does not justify giving them rights above those of the ordinary citizen / ratepayers.</li> <li>Maori have probably gained more from their relationships with Europeans than they have lost.</li> <li>It is good that Maori celebrate their cultural heritage and their history, but it is time we became one people politically.</li> <li>As Ngai Tahu are a northern tribe who invaded the South Island in relatively recent times and displaced the original tribes, the spelling should not be in southern dialect.</li> </ul>
94	Climate change	Policy 3.3.1 - Adapting to, or mitigating the effects of, sea level rise	Oppose	Oppose.	<p>The basis for the sea level rise used by the ORC is wrong:</p> <ul style="list-style-type: none"> <li>ORC's sources of information are not experts in the field of climate change and sea level rise (Dr. Renwick &amp; Dr Wratt, NIWA, Dr Wright and Dr Gluckman).</li> <li>In working group 1 (Science report), there is not one peer reviewed paper referenced that shows a link between CO2 and a known change of climate.</li> <li>Observations disprove the link between CO2 and climate change, which is one of the hypotheses on which IPCC projections are based.</li> <li>Major assumptions in the models are unknown and in order to derive a value for climate sensitivity these factors are simply guessed at.</li> <li>Satellite assessment of sea levels are subject to adjustments, the basis of which have been challenged in peer reviewed research publications and do not reflect the actual rise in the sea level against</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					land. <ul style="list-style-type: none"> <li>• Otago Harbour tide gauge data, NZ sea level data and global tide gauge data are not showing any increase in rate of rise.</li> <li>• IPCC is not impartial: its aim is to show that humans cause climate change.</li> </ul>

### 68 OSPRI

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	<ul style="list-style-type: none"> <li>• Remove "avoid" from the clause "Avoid the adverse effects of pest species..." in policies 2.1.1 - 2.1.6 and ensure consistency with other policies which state that adverse effects need to be controlled.</li> <li>• Clearly identify in the methods how this policy is to be given effect to.</li> </ul>	<ul style="list-style-type: none"> <li>• Possums are a pest species which are already established throughout Otago, therefore their adverse effects cannot be avoided.</li> <li>• It is unclear what the adverse effects are that are being referred to.</li> <li>• There appears to be no method outlining how these policies are to be given effect to.</li> <li>• In section 2.2, the wording is "controlling the adverse effects of pest species". Unclear why this is different to the requirements in section 2.1.</li> <li>• "Avoid" could imply the requirement of prohibited rules in regional and district plans to be consistent with the PRPS.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	<ul style="list-style-type: none"> <li>• Amend policies 2.2.4, 2.2.6, 2.2.9, 2.2.13 to ensure consistency with other policies relating to the "adverse effects of pest species".</li> <li>• Clearly identify in the methods how provision of these policies is to be given effect to.</li> </ul>	<ul style="list-style-type: none"> <li>• It is unclear why "controlling the adverse effects of pest species..." is specified in these areas and not areas of significant indigenous vegetation and habitat as covered by policy 2.2.2, or other areas in general.</li> <li>• The delivery of the provision in the methods is unclear.</li> <li>• The need to "control" is inconsistent with the requirement to "avoid" in Section 2.1.</li> </ul>
135	Hazardous substances and waste	Policy 3.9.6 - Encouraging use of best management practices for hazardous substance use	Oppose	<ul style="list-style-type: none"> <li>• Delete policy 3.9.6</li> <li>• Clearly identify in the methods how this policy is to be given effect to, and what is meant by "reducing their use".</li> </ul>	<ul style="list-style-type: none"> <li>• The "encourage" in this policy appears at odds with the Regional Plan: Water and Regional Plan: Air, which have rules relating to the use (discharge) of hazardous substances.</li> <li>• The use of hazardous substances is also controlled by the HSNO Act, which also requires best practice.</li> <li>• It is unclear in the policy whether "pesticides" are captured, and if so, "reducing their use" as stated is of concern.</li> </ul>
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Oppose	Delete 4.5.1 (b)	<ul style="list-style-type: none"> <li>• Many discharges are potentially offensive to Takata Whenua and the wider public, (b) - (c) are possible inclusions, not exhaustive lists.</li> <li>• (b) would effectively prohibit the use of any hazardous substances, which includes pesticides (currently permitted by the Water Plan) in a number of areas.</li> <li>• The use of pesticides in these areas is controlled by other legislation and other organisations including Ministry of Health and the Department of Conservation.</li> <li>• (b) is not needed and adds another layer of legislation that will impact on the ability to undertake work that benefits the environment.</li> </ul>

### 69 KiwiRail Holdings Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Support	Retain as notified.	<ul style="list-style-type: none"> <li>• KiwiRail support the four inter-related outcomes that are proposed and that these are the framework delivered through the RPS.</li> <li>• Particularly support the outcome relating to safety as it is of importance to Kiwirail in operating the rail network throughout the region.</li> </ul>
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Support	Retain as notified.	The recognition, maintenance and enhancement of the values of the natural and physical resources within the Region, is supported by KiwiRail.
31	Natural resource value	Policy 2.1.1 - Managing for	Support	Retain 2.1.1 (p) as notified.	The rail network crosses many freshwater environments, and ensuring



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	management - general	freshwater values			that it can continue to operate, and that the structures supporting the network can be maintained and upgraded, is essential.
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend Policy as follows: ... <u>"m) Maintain the ability of existing infrastructure to operate within their design parameters."</u>	<ul style="list-style-type: none"> <li>• Recognition of infrastructure in beds of rivers and lakes, wetlands and their margins would recognise practicalities around public access and natural character enhancement.</li> <li>• Ensuring that infrastructure can continue to operate as designed will address these matters, and is consistent with Policy 2.1.1(p).</li> </ul>
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend Policy as follows: ... <u>"j) Maintain the ability of existing infrastructure to operate within their design parameters."</u>	<ul style="list-style-type: none"> <li>• KiwiRail have infrastructure throughout the Otago region that is adjacent to, or in, the coastal environment.</li> <li>• Recognition of existing infrastructure important to ensure its ability to operate.</li> </ul>
49	Highly valued natural resources - the coastal environment	Policy 2.2.7 - Identifying the landward extent of the coastal environment	Support	Retain as notified.	The landward extent of the coastal environment, and the use of infrastructure and built form that has modified the coastal environment to do that, are supported.
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Support	Retain as notified.	KiwiRail support Council in seeking to ensure that the risk that natural hazards pose to communities are minimised.
83	Natural hazard risk	Policy 3.2.3 - Assessing natural hazard consequence	Support	Retain Policy 3.2.3 (e) and (g) as notified.	<ul style="list-style-type: none"> <li>• The assessment of natural hazard consequences through considering elements such as impacts on infrastructure and lifeline utilities is supported.</li> <li>• The ability to ensure that works are able to be undertaken as required to minimise the consequences of natural hazards, is important to ensure that the rail network continues to operate.</li> </ul>
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Support	Retain Policy 3.2.6 (b) as notified.	<ul style="list-style-type: none"> <li>• Rail network is not always able to relocate.</li> <li>• KiwiRail maintains and improves the rail network so the assets can withstand a degree of hazard event, and be recovered quickly following an event.</li> </ul>
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Support	Retain Policy 3.2.7 (d) (e) and (f) as notified.	KiwiRail support these three provisions as they relate to a design that facilitates recovery, relocation where practicable, and enabling development, upgrading, maintenance and operation of lifeline utilities.
90	Natural hazard risk	Policy 3.2.10 - Mitigating natural hazards	Support	Retain as notified.	<ul style="list-style-type: none"> <li>• The rail network is not easily relocatable and the range of alternatives is often reduced as a result.</li> <li>• Recognition of the constraints around the network for upgrade and maintenance is supported.</li> </ul>
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Support	Retain Policy 3.2.11 (b) as notified.	Enabling hard mitigation measures or similar engineering interventions on public land when they relate to the functioning of a lifeline utility is supported.
96	Objectives on resilience, health and safety	Objective 3.4 - Good quality infrastructure and services meet community needs	Support	Retain as notified.	Support recognition that good quality infrastructure and services meeting community needs requires maintenance and upgrade of lifeline utilities to ensure that they are able to operate.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Support	Retain as notified.	<ul style="list-style-type: none"> <li>• Support the integration of infrastructure with land use, and in particular the recognition of the functional need of infrastructure of regional / national importance.</li> <li>• Recognise that this requirement sits in tandem with Objective 3.8 and the supporting policies which seek to ensure that land use is integrated with infrastructure.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Support	Retain Policy 3.4.2 (e) and (g) as notified.	Recognising the constraints that exist with the operation, upgrade and maintenance of the rail corridor, and that there are at times limited opportunities for effective mitigation, is fundamental for KiwiRail.
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend as follows: "Policy 3.4.3 Designing lifeline utilities and facilities for essential or emergency services Design, <u>upgrade and maintain</u> lifeline utilities, and facilities for essential or emergency	<ul style="list-style-type: none"> <li>• The rail network is not newly established, and as some of the structures reach the end of their practical life, these are replaced with new technologies and improved designs that reflect the current standards.</li> <li>• Maintenance is fundamental to ensure that utilities are able to</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				services, to: a) Maintain their ability to function to the fullest extent possible, during and after natural hazard events; and..."	operate and provide a level of resilience in relation to natural hazards.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Support	Retain Policy 3.4.4 (a) as notified.	Operating a rail network can give rise to reverse sensitivity effects as a result of inappropriately located or designed developments.
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Support	Retain as notified	The rail network is nationally significant infrastructure that is not easily relocated: the ability to continue to operate it and ensure it can be maintained and upgraded as required, is supported.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Support	Retain Policy 3.5.1.(f) as notified.	Recognition of the national and regional significant significance of infrastructure, including rail, is supported.
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Support	Retain Policy 3.5.2 (a) and (b) as notified.	The rail network passes through many natural environments, and physically relocating it is not always feasible or practicable. Consideration of the ability to avoid effects, rather than simply avoid sites, when works are proposed along the existing network is therefore supported.
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Support	Retain Policy 3.5.3 (a) and (e) as notified.	<ul style="list-style-type: none"> <li>• Generally KiwiRail is not opposed to development adjoining the rail corridor if it is appropriately integrated to ensure reverse sensitivity effects do not arise.</li> <li>• Some infrastructure does not have a choice of location, and therefore seeking to protect these corridors through careful consideration of land use and development which has the potential to impede future improvement to that infrastructure, is supported.</li> </ul>
118	Urban design	Schedule 6 - Urban form and design	Support	Retain as notified.	<ul style="list-style-type: none"> <li>• Support the creation of a safe and enjoyable environment as part of urban form and design.</li> <li>• In particular, support (d) whereby Council seek to create safer transport networks. Safety is an important issue for KiwiRail and protecting the public from increased risk is vital for safe rail operations.</li> </ul>
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Support	Retain Policy 4.1.1.(a) as notified.	<ul style="list-style-type: none"> <li>• The provision of public access across rail structures over waterbodies can result in health and safety risks.</li> <li>• Recognition that in some instances restrictions on public access is appropriate, is therefore supported.</li> </ul>
249	Glossaries	Glossary	Support	Retain the definitions of "infrastructure", "lifeline utilities" and "reverse sensitivity" as notified.	<ul style="list-style-type: none"> <li>• KiwiRail support the inclusion of railway structures in the definition of "infrastructure" as proposed.</li> <li>• Support reference to the CDEM Act in the definition of "lifeline utilities".</li> <li>• Support the inclusion of a definition for "reverse sensitivity".</li> </ul>

### 70 Waitaki District Council

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Oppose	<ul style="list-style-type: none"> <li>• Amend Policy 1.1.2 b) from "Involve Kai Tahu in..." to "Consult Kai Tahu in..."</li> <li>• Delete clause f) iii.</li> </ul>	<ul style="list-style-type: none"> <li>• Councils have an obligation to consult and take into consideration the perspective of Tangata Whenua in their resource management decisions and implementation.</li> <li>• Ngai Tahu Claims Settlement Act 1998 was the final settlement of Ngai Tahu's historical claims with the Crown, including Statutory Acknowledgements.</li> <li>• It is discordant to introduce the requirements of Statutory Acknowledgement Areas outside the areas defined in the Act.</li> <li>• Proposed RPS does not define the "...other areas in Otago that are recognised as significant to Kai Tahu".</li> </ul>
21	Kai Tahu values, rights, interests	Policy 1.2.4 - Enabling Kai Tahu	Amend	Delete: a) Facilitating Kai Tahu access to sites	There is no obligation to facilitate access to sites of cultural

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	and customary resources	relationships with wahi tupuna and associated sites		of cultural significance;	significance within the Resource Management Act. Access to sites on private land is a matter of negotiation between the landowner and those seeking access.
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend to "Protecting significant indigenous vegetation and significant habitats of indigenous fauna".	Policy 2.1.6 inconsistent with RMA S6, which requires protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna.
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Oppose	<ul style="list-style-type: none"> <li>Amend to: "Protect, the values of outstanding natural features, landscapes and seascapes, by:..."</li> <li>Delete clause f).</li> </ul>	<ul style="list-style-type: none"> <li>There is no requirement or expectation in the RMA that outstanding natural features and landscapes will be enhanced or restored.</li> <li>It is questionable whether the features/ landscapes warrant "outstanding" status if they require enhancement or restoration. Conversely if they have achieve outstanding status will enhancing them make them more outstanding?</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Oppose	Delete Policy 2.2.5 and any other reference to special amenity landscapes and highly valued natural features are deleted.	<ul style="list-style-type: none"> <li>Waitaki District Council does not define special amenity landscapes and highly valued natural features within its current District Plan.</li> <li>Ultra vires, as there is no requirement in the RMA to recognise, protect and enhance special amenity landscapes and highly valued natural features.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Oppose	Delete Policy 2.2.6 and any other reference to special amenity landscapes and highly valued natural features are deleted.	<ul style="list-style-type: none"> <li>Waitaki District Council does not define special amenity landscapes and highly valued natural features within its current District Plan.</li> <li>Ultra vires, as there is no requirement in the RMA to recognise, protect and enhance special amenity landscapes and highly valued natural features.</li> </ul>
50	Highly valued natural resources - the coastal environment	Policy 2.2.8 - Identifying areas of high and outstanding natural character in the coastal environment	Amend	Delete the text "high and outstanding" from this Policy.	<ul style="list-style-type: none"> <li>RMA S6 does not introduce additional qualifiers to the natural character aspect of being high and outstanding. These embellishments introduce a higher threshold of what needs to be defined.</li> <li>The Policy is therefore erroneous and vulnerable to challenge.</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	<ul style="list-style-type: none"> <li>Delete the text "high" and "outstanding" is deleted from this Policy.</li> <li>Delete "or enhance" from the first sentence.</li> <li>Delete clause f).</li> </ul>	<ul style="list-style-type: none"> <li>RMA S6 does not introduce additional qualifiers to the natural character aspect of being high and outstanding. These embellishments introduce a higher threshold of what needs to be defined.</li> <li>The Policy is therefore erroneous and vulnerable to challenge.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Amend	Delete reference to Schedule 8.	<ul style="list-style-type: none"> <li>Policy 3.8.2 is not assisted by reference to a blank Schedule.</li> <li>If ORC wishes to complete Schedule 8 at a later date, it will require a variation to the Proposed RPS or a Plan Change once the RPS has been completed.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete.	<ul style="list-style-type: none"> <li>Policy 3.8.2 is not assisted by reference to a blank Schedule.</li> <li>If ORC wishes to complete Schedule 8 at a later date, it will require a variation to the Proposed RPS or a Plan Change once the RPS has been completed.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<ul style="list-style-type: none"> <li>Amend Policy 3.8.3 b) iii. to "reverse sensitivity effects on rural productive activities can be minimised where possible; and"</li> <li>Delete Policy 3.8.3 d).</li> </ul>	<ul style="list-style-type: none"> <li>Avoidance of all reverse sensitivity effects requires extensive buffers or no build areas between zones which is an inefficient use of land.</li> <li>Subdivision and development of rural land often reallocates available water supplies. But as subdivision displaces the land use which preceded it, it is questionable whether this is competing use.</li> <li>Avoiding demand for (all) other resources is difficult. The market determines best use or highest return.</li> </ul>
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Oppose	Delete Policy 3.9.4 b) ii.	<ul style="list-style-type: none"> <li>Under the NES for Assessing and Managing Contaminants in Soil to Protect Human Health, there is no absolute obligation to remediate contaminated land once it is identified.</li> <li>In light of the national direction, the text in Policy 3.9.4 b) ii. is incorrect and misleading.</li> </ul>
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Delete "...and areas of cultural or historic significance...".	<ul style="list-style-type: none"> <li>The only requirement to provide access in RMA is in Section 6(d): "the maintenance and enhancement of public access to and along the</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					coastal marine area, lakes, and rivers." • There is no ability to maintain or enhance public access to areas of cultural or historic significance.
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Amend	<ul style="list-style-type: none"> <li>Define the Dry catchments in a Schedule to the RPS or specify a methodology whereby those catchments can be identified.</li> <li>Amend Method 4 to Policy 4.3.2 to "Regional Plan".</li> </ul>	<ul style="list-style-type: none"> <li>There is no Schedule of Dry Catchments or a methodology for defining Dry Catchments.</li> <li>Method 6 requires TAs to manage forestry or minimising conversion of tussock grasslands within those undefined catchments.</li> <li>The TAs have no expertise in managing water quantity. This role belongs to Regional Councils under s30 of the RMA.</li> <li>As TLAs would refer to ORC for guidance on the suitability of an application, it is pointless delegating this particular function.</li> <li>Dry catchment rules within the Regional Water Plan would be more focussed and achieve the required functions of a Regional Council.</li> </ul>
197	Method 6 - Research, Monitoring and Reporting	Method 6 - Research, Monitoring and Reporting	Amend	Specify in the methods that ORC will proactively model the potential urban areas which may be vulnerable to air quality degradation to inform the desirability of subdivision or rezoning in the future.	<ul style="list-style-type: none"> <li>ORC is aware of the location of its problematic airsheds.</li> <li>Without assessment by ORC, implementing Policy 3.8.1 would introduce costs to either the Council involved or the land developer.</li> </ul>
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Amend	Include the requirement for the ORC develop a region-wide Biodiversity Strategy.	<ul style="list-style-type: none"> <li>Waitaki District Council has prepared and approved an Indigenous Biodiversity Strategy.</li> <li>Otago Regional Council has been curiously silent about strategic direction for managing Otago's Indigenous Biodiversity.</li> <li>Otago's responses to its biodiversity obligations have therefore been highly variable.</li> </ul>
262	Objectives on Kai Tahu values	Need 1.2	Amend	Delete "...more effectively,..." from the "Need" associated to Objective 1.2 (p.16).	This erroneously assumes local authorities are currently not recognising Kai Tahu values and plans effectively.
265	Chapter B2 - High quality natural resources	Outcome 2 and introduction	Amend	Amend the 2nd paragraph of the introduction to Chapter B2 to: " It is critical to recognise the value we place on Otago's natural resources and to manage these resources accordingly. This includes identifying resources which we want to <del>preserve</del> <u>maintain</u> for future generations."	The only requirement to preserve in Part 2 of the RMA relates to preserving the natural character of the coastal environment. There is no generic mandate to preserve Otago's natural resources.
280	Objectives on resilience, health and safety	Need 3.8	Amend	Change "Unplanned" to "Unanticipated".	<ul style="list-style-type: none"> <li>Councils provide for urban growth by zoning and proactively providing the necessary and suitably proportioned infrastructure to service the land.</li> <li>The RMA allows for unplanned urban growth through the Private Plan Change process, in which case, the cost of accommodating the infrastructure capacity demands are borne by the developer.</li> <li>The germane issue is urban growth onto highly valued soils or lack of connectivity to existing urban areas.</li> </ul>
297	Objectives on use and enjoyment of natural and built environment	Introduction to Objective 4.1	Amend	Remove the reference to improving access to "sites of cultural and historic significance" from the introduction to Objective 4.1.	<ul style="list-style-type: none"> <li>The only requirement to provide access in RMA is in Section 6(d): "the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers."</li> <li>There is no ability to maintain or enhance public access to areas of cultural or historic significance.</li> </ul>

### 71 D.P. Pedersen

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Support	<ul style="list-style-type: none"> <li>Keep our city clean - clean leaves and stones from culverts and gutters, manage trees that shed leaves into people's spouting and drainage.</li> </ul>	<ul style="list-style-type: none"> <li>Prevents flooding, which prevents cost in the long term.</li> <li>Maintains beauty</li> <li>Keeps streams free from rubbish</li> </ul>

### 72 T. Pedersen

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
150	Historic heritage	Policy 4.2.2 - Identifying historic heritage	Amend	<ul style="list-style-type: none"> <li>• Make it compulsory to list buildings that are of heritage value and place with the Historic Places Trust and protect these immediately.</li> <li>• Maintain total historic integrity of an area.</li> </ul>	<ul style="list-style-type: none"> <li>• Many heritage buildings are not listed. This is wrong.</li> <li>• Historic Places need power to save and retain heritage buildings individually and as a total area / precinct, rather than leaving them to be picked off one by one.</li> </ul>
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Did not specify	Encourage maintenance of heritage buildings.	Historic Places need power to save and retain heritage buildings individually and as a total area / precinct, rather than leaving them to be picked off one by one.
207	Method 7 - Strategies and Plans (non-RMA)	Method 7.4 - Pest management strategy	Amend	<ul style="list-style-type: none"> <li>• Actively pursue "Old man's beard" and respond to complaints, and not fob people off who made you aware of it.</li> <li>• List Ivy also.</li> </ul>	No reason given.

### 73 Guardians of Lake Wanaka and Guardians of Lake Hawea

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Oppose	<ul style="list-style-type: none"> <li>• Review the outcomes to make them more tangible, measurable, and inspirational.</li> <li>• Clarify the operational intent behind the PRPS though more detailed methods and the review of vague or ambiguous statements ("values", "recognise").</li> <li>• Clearly spell out the nature of the relationship of the RPS to The ORC Long Term Plan and Regional City and District plans.</li> </ul>	<ul style="list-style-type: none"> <li>• The PRPS does not provide for the requirements of the RMA: <ul style="list-style-type: none"> <li>• It only provides a slim list of many but not all of the "resource management issues of the region".</li> <li>• Methods are lacking in detail.</li> </ul> </li> <li>• The proposed 4 outcomes are weak and have no stretch.</li> <li>• Such words as "values" (in the absence of a specific definition) or "recognise" are vague and imprecise: they do not state clearly ORC's operational intent, and will make it difficult to assess progress towards achieving the intent in the RPS.</li> <li>• It may not adequately serve the people of Otago, in the absence of more tangible targets, measurable outcomes, or more operationally focused management plans.</li> <li>• Many important aspects of the feedback from submitters on the earlier consultation draft have been ignored.</li> <li>• The RPS is not a stand-alone document; its relationships to the ORC Long Term Plan, and regional, city and district plans is not clearly spelled out.</li> <li>• This document will not function as an effective guide to the ORC Long Term Plan, nor to provide ecosystem management leadership to Regional, District and City Plans.</li> </ul>
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	<ul style="list-style-type: none"> <li>• Consider a more meaningful aspirational outcome, e.g.: "<u>Otago's natural resources and ecosystems are maintained, enhanced and sustainably managed.</u>"</li> <li>• Make more reference to Schedule 5, i.e. wherever Schedule 4 is referred to.</li> <li>• Review and merge the 3 objectives and associated policies while retaining their important elements.</li> </ul>	<ul style="list-style-type: none"> <li>• The proposed outcome is weak, and could be said to be already true and therefore has no stretch. It could be achieved by diminishing existing standards.</li> <li>• Schedule 5 has almost no cross reference to it in the text (only Policy 2.2.1), while it could be helpful, notably wherever Schedule 4 is referred to.</li> <li>• Objective 2.1, 2.2 and 2.3 are vague and imprecise: What is the difference between "natural and physical resources"? What happens when they are "recognised"?</li> <li>• The objectives, policies, issues and "needs" do not differ substantially from one another. Their similarity with their multiple policies does not help the credibility of the PRPS.</li> <li>• The objectives, policies, issues and needs use imprecise wording: what does "value" mean? What is the difference between "natural and physical resources"? What happens when they are "recognised"?</li> </ul>
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	Make explicit ORC's intent for the management of major Otago freshwater ecosystems, but especially the iconic deepwater Lakes Hawea, Wanaka and Wakatipu.	<ul style="list-style-type: none"> <li>• ORC's intent is not clear in the PRPS.</li> <li>• The abysmal lack of management of these lakes by ORC is of serious concern.</li> <li>• The importance of these lakes in under-pinning Otago's tourism industry must not be underestimated.</li> </ul>
30	Natural resource value	Policy suite 2.1 - The values of	Amend	Merge policies 2.1.1 and 2.1.2 and their two	<ul style="list-style-type: none"> <li>• Given that the beds and margins of rivers and lakes, wetlands are an</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	management - general	natural resources are recognised, maintained or enhanced		action lists into a single more meaningful policy.	integral component of the water bodies mentioned in 2.1.1, it would surely make more sense to merge them. • The separation of these two policies is artificial, un-necessary and misleading.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	<ul style="list-style-type: none"> <li>• Mention deepwater Lakes Hawea, Wanaka and Wakatipu as part of ORC's intent.</li> <li>• Acknowledge explicitly issues of assessing status of, and managing freshwater biodiversity.</li> </ul>	<ul style="list-style-type: none"> <li>• Excellent list of apparent freshwater management intentions. If these are addressed with meaningful operational plans by ORC then we can expect to see some major improvements in how Otago's freshwater ecosystems are managed.</li> <li>• There is however almost nothing here that explicitly acknowledges issues of assessing status of, and managing freshwater biodiversity.</li> <li>• There is no clear statement of operational intent in relation to "Managing for freshwater values".</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Did not specify	Clarify whether both terrestrial and aquatic habitats and ecosystems are included.	<ul style="list-style-type: none"> <li>• For some of the policies under Objective 2.2, it is not clear whether both terrestrial and aquatic habitats and ecosystems are included.</li> <li>• If this is not explicit it seems likely that major freshwater systems (e.g. deepwater Lakes Hawea, Wanaka and Wakatipu) will continue to be overlooked.</li> </ul>
43	Highly valued natural resources - indigenous biodiversity	Schedule 5 - Criteria for the assessment of significant indigenous vegetation and habitat of indigenous fauna	Did not specify	<ul style="list-style-type: none"> <li>• Clarify Schedule 5.</li> <li>• Add more reference to Schedule 5 in the document.</li> </ul>	<ul style="list-style-type: none"> <li>• Schedule 5 has almost no cross reference to it in the text (only Policy 2.2.1).</li> <li>• It seems to refer only to the "significance of indigenous vegetation and habitat of indigenous fauna". What action towards biodiversity protection/enhancement does this imply?</li> <li>• What will be the organism size cut-off below which ORC ignores schedule 5 factors? Diversity, biomass, and biogeochemical functionality generally increase with diminishing organism size, especially in aquatic ecosystems.</li> <li>• It is not clear how the items listed will provide for operationally achievable actions by ORC with respect to its environmental management responsibilities.</li> </ul>
65	Chapter B3 - Resilience, health and safety	Chapter B3 - general requests	Amend	Delete sections on "recognising" things, and go straight to "assessing" various risks etc.	<ul style="list-style-type: none"> <li>• This chapter addresses a number of important issues which we agree with.</li> <li>• There is some vague language which weakens the clarity of ORC's intent.</li> </ul>
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	<ul style="list-style-type: none"> <li>• Delete sections on "recognising" things.</li> <li>• Make more specific mention of the importance of tourism and its dependence on the Otago environment and ecosystems remaining in a state of high attractiveness.</li> </ul>	<ul style="list-style-type: none"> <li>• This chapter addresses a number of important issues which we agree with.</li> <li>• There is some vague language which weakens the clarity of ORC's intent.</li> <li>• There is very limited mention of the importance of tourism, and its dependence on the Otago environment and ecosystems remaining in a state of high attractiveness, especially the deepwater Lakes Hawea, Wanaka and Wakatipu. The importance of these lakes in underpinning Otago's tourism industry must not be underestimated.</li> </ul>
165	Making the most of available resources	Policy 4.4.3 - Encouraging environmental enhancement	Amend	Clarify why items a) through to i) are all followed by "or".	It is not obvious why the items a) through to i) are all followed by "or" implying that only one or a few of these items will be addressed with ORC action.
172	Management of adverse effects	Policy 4.5.5 - Controlling the introduction and spread of pest plants and animals	Amend	Clarify why items listed are all followed by "or".	It is not obvious why the items a) through to i) are all followed by "or" implying that only one or a few of these items will be addressed with ORC action.
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Ensure biodiversity off-set will result in a net increase in biodiversity, or at the very least be conditional on no-loss of biodiversity.	<ul style="list-style-type: none"> <li>• This policy would need to be handled with great care including the use of meaningful metrics of biodiversity and taking into account ecosystem function.</li> <li>• Potential industrial/agricultural/or residential developer proponents can have a strong vested interests in pushing off-setting through to help ensure resource consent granting without there being compelling evidence of the environmental/biodiversity benefits.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Ensure biodiversity off-set will result in a net increase in biodiversity, or at the very least be conditional on no-loss of biodiversity.	<ul style="list-style-type: none"> <li>This policy would need to be handled with great care including the use of meaningful metrics of biodiversity and taking into account ecosystem function.</li> <li>Potential industrial/agricultural/or residential developer proponents can have a strong vested interests in pushing off-setting through to help ensure resource consent granting without there being compelling evidence of the environmental/biodiversity benefits.</li> </ul>
178	Methods	Methods - general	Amend	Review methods so they are more detailed and operationally achievable.	<ul style="list-style-type: none"> <li>Scant detail in methods.</li> <li>The methods seem to only repeat policies and state that methods will be provided in regional plans, which is strange and ineffective.</li> </ul>
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Amend	Add a Regional Biodiversity Strategy that links in with the NZ Biodiversity Strategy and District biodiversity strategies. The Regional Biodiversity Strategy should include specific targets with measurable outcomes – especially those that relate to water bodies in general and the Otago deepwater lakes in particular.	No reason given
226	Anticipated Environmental Results	Anticipated Environmental Results - General	Amend	Make AERs applicable and useful.	<ul style="list-style-type: none"> <li>We have concerns with the applicability and utility of most of the indicators under the AERs.</li> <li>None of the indicator descriptions are likely to address the major risks to Otago's deepwater lakes.</li> <li>They could experience substantial decline in their quality and ecosystems and still meet criteria.</li> <li>Current "water quality indicator values" are quite inadequate for managing for the status quo conditions of Otago's deepwater lakes.</li> </ul>
230	Anticipated Environmental Results	AER 2.2 - Otago's water bodies support healthy ecosystems, are safe for swimming, and maintain their natural form and character	Amend	Amend.	<ul style="list-style-type: none"> <li>None of the indicator descriptions are likely to address the major risks to Otago's deepwater lakes.</li> <li>They could experience substantial decline in their quality and ecosystems and still meet criteria.</li> <li>Current "water quality indicator values" are quite inadequate for managing for the status quo conditions of Otago's deepwater lakes.</li> </ul>
249	Glossaries	Glossary	Amend	Include a definition of "values", using the RMA definition of intrinsic values: "intrinsic values, in relation to ecosystems, means those aspects of ecosystems and their constituent parts which have value in their own right, including—(a) their biological and genetic diversity; and (b) the essential characteristics that determine an ecosystem's integrity, form, functioning, and resilience".	<ul style="list-style-type: none"> <li>Term "values" is vague</li> <li>Any actions taken by ORC will not be able to be assessed to determine whether or not they can be or have been achieved.</li> <li>We presume the term "values" as used in the PRPS must have the same meaning as "intrinsic values" in the RMA.</li> </ul>

## 74 Contact Energy Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Support	Support intent and in particular: <ul style="list-style-type: none"> <li>the positive focus on desired outcomes</li> <li>Objective 3.5 and its accompanying policies</li> <li>Objective 3.6 and its accompanying policies</li> </ul>	Focus on desired outcomes rather than issues as problems forward looking, aspirational, enables outcomes.
6	Overall approach	Schedule 3 - Significance threshold	Amend	Amend "1. Nature of Effect", to read as follows: "A detailed description of the effect that is occurring or might <u>reasonably be expected to occur...</u> "	While "effect" is a defined term in the RMA and therefore qualified, the requirement to consider effects that "might occur" encompasses events with a remote probability of occurring.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend Policy 1.2.1 a) to read as follows: "a) Ensuring resources <u>continue to</u> support their <u>current</u> customary uses and cultural values (as detailed in Schedules 1A and B);"	<ul style="list-style-type: none"> <li>Contact supports this policy's intent.</li> <li>Given the breadth of past modification to the natural environment, and the breadth of customary uses and cultural values identified in Schedules 1A and 1B, Policy 1.2.1 a) should not overstate what is</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					possible. <ul style="list-style-type: none"> <li>Rivers modified by dams (and other infrastructure) may not be able to "ensure" traditional customary uses and cultural values such as Mahika Kai are always delivered.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	<ul style="list-style-type: none"> <li>In c), insert a cross reference to Policy 2.2.12.</li> <li>Amend d) to read: "Protect <u>current</u> migratory patterns..."</li> <li>Amend f) to read: "Maintain good water quality, including in the coastal marine area, or enhance it where it has been degraded, <u>acknowledging that naturally occurring processes such as floods intermittently lower water quality</u>."</li> <li>Amend h) to read: "Maintain or enhance the natural functioning of rivers, lakes, and wetlands, their riparian margins, and aquifers, <u>other than those rivers modified by hydro electric generation use or other infrastructure.</u>"</li> <li>Amend m) to read: "Maintain the <u>existing</u> aesthetic and landscape values of..."</li> <li>Delete n).</li> <li>Add the following item: " <u>q) Provide for and protect hydro electric power generation</u>"</li> <li>Retain p).</li> </ul>	<ul style="list-style-type: none"> <li>The values provided for in Policy 2.1.1 are broadly expressed and require some clarification or qualification to "manage" freshwater to achieve them: <ul style="list-style-type: none"> <li>The meaning of "outstanding" water body needs clarification;</li> <li>Natural processes and their effects need to be acknowledged;</li> <li>It is appropriate to clarify that protection applies to current values;</li> </ul> </li> <li>Surprised that Policy 2.1.1 makes no reference to hydro generation and its infrastructure.</li> <li>Hydro electric power generation is a national value in the NPS for Freshwater Management 2014 and nationally significant in terms of the NPS for Renewable Electricity Generation 2011.</li> <li>Section 62 (3) of the RMA requires an RPS to give effect to both NPSs.</li> <li>Unclear how freshwater management may achieve n).</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	<ul style="list-style-type: none"> <li>Add a further management outcome as follows: " <u>m) Maintain the ability of existing infrastructure to operate within their design parameters.</u>"</li> <li>Amend a) to read: "Protect <del>or restore</del> their <u>existing</u> natural functioning;"</li> <li>In b), insert a cross reference to Policy 2.2.12.</li> <li>Amend c) to read: "Maintain good water quality, or enhance it where it has been degraded, <u>acknowledging that naturally occurring processes such as floods intermittently lower water quality</u>."</li> <li>Amend f) to read: "Maintain or enhance <u>existing</u> natural character".</li> <li>Amend i) to read: "Maintain <u>existing</u> aesthetic and amenity values".</li> <li>Delete j).</li> </ul>	<ul style="list-style-type: none"> <li>It is appropriate that Policy 2.1.2 also includes maintaining infrastructure, in particular hydro electric generation infrastructure: <ul style="list-style-type: none"> <li>Hydro electric power generation is a national value in the NPS for Freshwater Management 2014 and nationally significant in terms of the NPS for Renewable Electricity Generation 2011.</li> <li>Section 62 (3) of the RMA requires an RPS to give effect to both NPSs.</li> </ul> </li> <li>The values to be protected, restored, maintained etc are expressed too broadly: <ul style="list-style-type: none"> <li>The meaning of "outstanding" water body needs clarification;</li> <li>Natural processes and their effects need to be acknowledged;</li> <li>It is appropriate to clarify that protection applies to current values;</li> </ul> </li> <li>Unclear how freshwater management may achieve j).</li> </ul>
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Amend	<ul style="list-style-type: none"> <li>Amend Schedule 4 heading to read as follows: "Criteria for the identification of <u>outstanding/highly valued</u> natural features and landscapes."</li> <li>Amend Schedule 4 introductory description to read as follows: "The identification of <u>outstanding</u> natural features, <del>and</del> landscapes <u>and seascapes (Policy 2.2.3) and special amenity landscapes and highly valued natural features (Policy 2.2.5)</u> will be based on <del>but not limited to</del> <u>an assessment of</u> the following factors:"</li> </ul>	<ul style="list-style-type: none"> <li>The heading and description for this Schedule are incorrect, as the criteria are to be used for determining the value of natural features and landscapes, and not to identify "natural features and landscapes".</li> <li>Given the importance of this identification, the list of attributes to be considered should be exclusive.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of	Amend	Add a further method to Policy 2.2.2 (new f) to protect and enhance values as follows: " <u>f) Offsetting where adverse effects cannot be</u>	It is appropriate that this policy also provides for offsetting of adverse effects as do Policies 4.5.7 and 4.5.8 in relation to indigenous biodiversity.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		indigenous fauna		<u>avoided, remedied or mitigated and the activities causing those effects have a functional necessity to locate in the area of vegetation or habitat.</u> "	
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	<ul style="list-style-type: none"> <li>• Provide guidance as to how the attributes in Schedule 4 are to be applied to natural features, landscapes, and seascapes to distinguish between those that are "outstanding" and those that are not. (Policy 2.2.12 provides an example.)</li> <li>• Clarify that highly modified landscapes do not qualify as "outstanding".</li> </ul>	<ul style="list-style-type: none"> <li>• The attributes cross referenced in Schedule 4 are very broad and no guidance is provided as to how to apply them or what is required in terms of these attributes to qualify as "outstanding".</li> <li>• Further the list is not exclusive, as the assessment of "outstanding" quality "will be based on, but not limited to" the attributes listed.</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	<ul style="list-style-type: none"> <li>• Amend Policy 2.2.4 a) to read as follows: "Avoid <u>significant</u> adverse effects on those values which <del>contribute to the significance of</del> <u>make</u> the natural feature, landscape or seascape <u>outstanding.</u>"</li> <li>• Delete Policy 2.2.4 b).</li> </ul>	<ul style="list-style-type: none"> <li>• Avoidance is tantamount to prohibition and should not be a standard required for anything less than an outstanding feature, landscape or seascape. Avoidance in a) may be intended to apply to those assessed as "outstanding" but the policy does not say so.</li> <li>• It is not clear what "other values" may be, in 2.2.4 (b), and why adverse effects on values that do not contribute to the significance of the natural feature, landscape or seascape should require to be avoided, remedied or mitigated.</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Provide guidance as to how the attributes in Schedule 4 are to be applied to special amenity landscapes or natural features to distinguish between those that are "outstanding" and those that are highly valued but not outstanding.	<ul style="list-style-type: none"> <li>• Schedule 4 is referred to for the identification of special amenity landscapes and of outstanding natural features, landscapes and seascapes. There is no guidance on how to use Schedule 4's attributes to enable a different qualification assessment, i.e: something outstanding vs. something less than outstanding.</li> <li>• Using the same attributes is not necessarily appropriate: the recreational value of a landscape may give it special amenity value but that is not provided for in Schedule 4.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	<ul style="list-style-type: none"> <li>• Amend Policy 2.2.6 a) to read as follows: "a) Avoiding, <u>remedying or mitigating</u> significant adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature".</li> <li>• Delete Policy 2.2.6 b).</li> </ul>	<ul style="list-style-type: none"> <li>• It is appropriate that a lesser standard of protection is mandated for landscapes/features that are less than outstanding.</li> <li>• Given the interpretation on "avoid" by the Supreme Court it is not appropriate that a) requires avoidance of adverse effects, even those that are significant, without providing for the alternatives of remediation or mitigation.</li> <li>• It is unclear what "other values" are in Policy 2.2.6 b) and why adverse effects on values that do not contribute to the special amenity of the landscape or high value of the natural feature should be avoided, remedied or mitigated.</li> </ul>
54	Highly valued natural resources - outstanding water bodies	Policy 2.2.12 - Identifying outstanding water bodies and wetlands	Amend	Amend Policy 2.2.12 f) to read as follows: "f) Significant hydrological values ( <u>including electricity generation capacity</u> )"	<ul style="list-style-type: none"> <li>• Contact supports Policy 2.2.12 as providing clear criteria as to how "outstanding" quality will be assessed.</li> <li>• f) requires some further clarification, given the approach of including natural and anthropogenic values.</li> <li>• "A high degree of naturalness" should be explained in the glossary.</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Support	Retain policy 2.2.13.	Contact supports Policy 2.2.13's qualification of significant adverse effects on outstanding water bodies that require avoidance.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	<ul style="list-style-type: none"> <li>• Amend Policy 3.1.1 to read as follows: "Recognise the <del>natural and physical</del> environmental constraints of an <u>area and their effect on the protection, use and development of natural and physical resources including</u> the effects of <del>these</del> constraints on activities, and the effects of those activities on those constraints, including:"</li> <li>• Add a further factor to Policy 3.1.1 (new f) to</li> </ul>	<ul style="list-style-type: none"> <li>• Discrepancy between Policy 3.1.1 and Objective 3.1, as the policy does not pick up that the protection to natural and physical resources has to take into account environmental constraints, and only focuses on the effects of constraints on activities.</li> <li>• It should recognise constraints posed by the physical environment (for example, dams) and not just the natural environment.</li> </ul>

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				recognise the constraint posed by the physical environment as follows: " <u>f) The constraint created by the physical environment such as dams.</u> ".	
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Support	Retain Policy 3.2.7 f).	Contact supports the recognition that essential physical infrastructure must be maintained, upgraded and developed to reduce natural hazard risk.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	<ul style="list-style-type: none"> <li>• Retain Policy 3.4.1 a).</li> <li>• Amend Policy 3.4.1 b) to read as follows: "b) Designing <u>new</u> infrastructure to take into account."</li> <li>• Add a further subpolicy to Policy 3.4.1 c) to read as follows: "<u>c) iii. In a way that does not limit or foreclose the ability of infrastructure to continue functioning within its design parameters.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>• Contact supports the recognition of infrastructure in this policy.</li> <li>• While it might be inferred, b) should make explicit that it applies to new infrastructure.</li> <li>• c) needs to recognise that urban growth must also be managed to protect the infrastructure.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend Policy 3.4.2 g) to read as follows: "g) Protect the functioning of <u>significant infrastructure, in particular of</u> lifeline utilities and essential or emergency services."	<ul style="list-style-type: none"> <li>• The RPS in general fails to recognise that infrastructure (particularly significant infrastructure) requires protection in its own right.</li> <li>• Policy 3.4.2 g) limits protection to "the functioning of lifeline utilities and essential or emergency services." This policy should be extended to include all significant infrastructure or it will not meet community needs such as being integrated with land use and serving urban growth.</li> </ul>
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend Policy 3.5.1 a) to read as follows: "a) Renewable electricity generation <u>activities</u> facilities-, where they supply the national electricity grid and <u>/or</u> local distribution network;"	<ul style="list-style-type: none"> <li>• Contact supports Objective 3.5 and the intent of Policy 3.5.1.</li> <li>• The NPS for Renewable Electricity Generation 2011 refers to and defines renewable electricity generation activities (rather than facilities).</li> <li>• The policy as written may be construed as requiring the electricity generated to be supplied into both the national grid and local network whereas the NPS does not require both.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	<ul style="list-style-type: none"> <li>• Amend Policy 3.5.2 to read as follows: "Minimise adverse effects from <u>new infrastructure that has national or regional significance</u>."</li> <li>• Amend policy 3.5.2 b) to read as follows: "b) <u>Where it is not reasonably possible</u> to avoid locating...."</li> <li>• Delete 3.5.2 c).</li> <li>• Amend Policy 3.5.2 e) to read as follows: "e) Considering the use of offsetting, or other compensatory measures, for residual adverse effects on indigenous biodiversity <u>that are more than minor</u>."</li> </ul>	<ul style="list-style-type: none"> <li>• Policy 3.5.2 needs to be clarified so it is read as relating to new infrastructure.</li> <li>• For b) needs some qualification so that it is not read as relating to physical impossibility which would be too narrow.</li> <li>• For c) there should not be an open ended requirement to avoid, remedy or mitigate adverse effects on values that do not contribute to the quality of the area/vegetation/water body etc.</li> <li>• The requirement to offset "residual" effects requires some qualification. The RMA is not a "no effects" statute and has no requirement to address all adverse effects of an activity which this sub policy effectively requires.</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<ul style="list-style-type: none"> <li>• Amend 3.5.3 a) to read as follows: "a) <u>Restricting Preventing</u> the establishment of activities that may result in reverse sensitivity effects"</li> <li>• Amend Policy 3.5.3 b) and c) to read as follows: "b) Avoiding significant adverse effects, <u>including effects which are cumulatively significant,</u> on the functional needs of such infrastructure." "c) Avoiding, remedying or mitigating other adverse effects, <u>including cumulative effects,</u></li> </ul>	Policy 3.5.3 a) needs strengthening to avoid reverse sensitivity effects. Contact also considers that the policy needs to include recognition of cumulative effects.

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				on the functional needs of such infrastructure.”	
109	Energy	Policy 3.6.1 - Using existing renewable electricity generation structures and facilities	Amend	Expand Policy 3.6.1 by adding a) to read as follows (using the language of the NPS REG): “ <u>a) enabling the maintenance, operation, upgrading and development of existing renewable electricity generation activities.</u> ”	The policy needs some expansion to recognise that the search for greater efficiencies within existing facilities and operations to increase capacity entails supporting ongoing maintenance, operation, upgrading and development.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	<ul style="list-style-type: none"> <li>Amend 3.6.3 a) to read as follows: “a) Recognising <u>and providing for</u> the functional needs of renewable electricity generation activities including <u>natural and</u> physical resource supply needs;”</li> <li>Amend 3.6.3 b) to read as follows: “b) <del>Restricting</del> <u>Preventing</u> the establishment of those activities that may result in reverse sensitivity effects;”</li> </ul>	<ul style="list-style-type: none"> <li>Minor amendments to a) and b) to give effect to the National Policy Statements for Freshwater and Renewable Electricity Generation.</li> <li>a) needs to provide for as well as recognise renewable electricity generation’s needs and to refer to natural resources as well as physical resource supply needs.</li> <li>b) needs strengthening to avoid reverse sensitivity effects.</li> </ul>
150	Historic heritage	Policy 4.2.2 - Identifying historic heritage	Amend	<ul style="list-style-type: none"> <li>Amend Policy 4.2.2 to read as follows: “Identify <u>the values of</u> historic heritage places and areas <u>to identify those</u> of regional and national significance, using the following attributes, detailed in Schedule 7.”</li> <li>Delete “rarity”, “representativeness” and “integrity” from Policy 4.2.2.</li> <li>Provide guidance as to how to apply the attributes to determine regional or national significance.</li> </ul>	<ul style="list-style-type: none"> <li>List of common criteria for identifying historic heritage is wider than the criteria listed in the RMA, and includes values more commonly associated with identification of biodiversity.</li> <li>Lack of guidance about how to make a qualitative assessment in identifying historic places and assessing their significance, is likely to result in many “historic” places and areas being identified, and treated as significant or of equal significance. There is no guidance as to what constitutes regionally or nationally significant heritage.</li> <li>Such qualitative assessment is necessary given the level of protection granted to historic places and areas in Policy 4.2.3, which requires that: <ul style="list-style-type: none"> <li>All historic heritage be protected and enhanced irrespective of comparative value.</li> <li>Adverse effects on areas or places of national or regional significance be avoided.</li> <li>Significant adverse effects be avoided on “other values”.</li> </ul> </li> <li>Policies 4.2.2 and 4.2.3 result together in a too broad brush approach to heritage.</li> </ul>
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend Policy 4.2.3 to read as follows: “ <u>Subject to constraints created by ongoing use and financial impact,</u> protect and enhance the values of places and areas of historic heritage by:”	The policy fails to account for historic places that are still be in use as a commercial or industrial facilities, e.g. the Roxburgh Power Station. A requirement to avoid adverse effects on its values would likely prevent its ongoing use as a power station.
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	<ul style="list-style-type: none"> <li>Amend Policy 4.3.1 a) to read as follows: “a) Enabling the <u>continuation of existing</u> farming and other rural activities that support the rural economy;</li> <li>Add a further subpolicy to Policy 4.3.1 to read as follows: “<u>b) Enabling new farming activities to establish where natural resources are available to sustain the activity without derogating from existing uses and the sensitivity of natural and physical resources to adverse effects from the proposed activity/land use is accounted for.</u>”</li> </ul>	<ul style="list-style-type: none"> <li>All farming everywhere is not appropriate: Economic production must co-exist with the natural resources identified and protected and enhanced in Chapter 2 and meet the objectives of the National Policy Statement for Freshwater Management 2014.</li> <li>Policy 4.3.1 a) is too broad and needs to acknowledge these constraints.</li> </ul>
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	Add a new e) as follows: “ <u>e) In making allocation decisions assess potential conflicts between resource users and ensure there is no derogation of existing lawfully established uses of water.</u> ”	<ul style="list-style-type: none"> <li>The policy does not establish a basis for the allocation of water including managing conflicts between resource users or adverse effects on existing users.</li> <li>AER 4.4 anticipates that there will be fewer conflicts between resource uses and users, presumably as a result of this policy. It</li> </ul>

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174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend Policy 4.5.7 c) to read as follows: "c) Those effects do not result in the loss of irreplaceable <del>or vulnerable</del> biodiversity."	<p>needs to address this point.</p> <ul style="list-style-type: none"> <li>• The policy unnecessarily narrows the circumstances in which offsetting may be used.</li> <li>• Policy 4.5.7 c) does not allow offsetting when the adverse effects of the activity will/may result in the loss of vulnerable biodiversity. There are environmental advantages to being able to offset in such situations because being able to offset (on a like for like basis) will make other vulnerable biodiversity less so.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Amend Policy 4.5.8 b) to read as follows: "b) <u>The location of the offset chosen will result in the best ecological outcome with the offset being sited close to the development's location being preferred.</u> <del>The offset is undertaken close to the location of development, where this will result in the best ecological outcome.</del> "	The drafting of Policy 4.5.8 b) is ambiguous. It is not clear whether offsetting close to the location of development is a prerequisite of offsetting as an option or only applies in the event that it will result in the best ecological outcome.
230	Anticipated Environmental Results	AER 2.2 - Otago's water bodies support healthy ecosystems, are safe for swimming, and maintain their natural form and character	Amend	Amend AER 2.2 to read as follows: "Otago's water bodies <u>generally</u> support healthy ecosystems, are safe for swimming, and <u>where unmodified</u> , maintain their natural form and character."	<ul style="list-style-type: none"> <li>• Not all Otago's waterways are "outstanding" for their natural values or unmodified.</li> <li>• The AER needs to be amended to clarify the waterways to which this outcome applies.</li> </ul>
243	Anticipated Environmental Results	AER 4.1 - Otago's coast, lakes and rivers can be accessed by the public	Amend	Amend AER 4.1 to read as follows: "Otago's coast, lakes and rivers can be accessed by the public <u>(within limits to protect health and safety)</u> ."	<ul style="list-style-type: none"> <li>• This AER suggests an assumption of a right of access.</li> <li>• AER less nuanced than the related policy (4.1.1).</li> </ul>
246	Anticipated Environmental Results	AER 4.4 - Use of Otago's natural resources is more efficient, and there are fewer conflicts between resource uses and users	Amend	Delete AER 4.4 if Policy 4.4.1 not amended as requested.	<ul style="list-style-type: none"> <li>• There is no policy that specifically addresses reducing conflicts or requires consideration of the impact on existing users of allocation decisions in relation to water.</li> <li>• It is a leap to assume that reduced conflict will follow from efficient allocation unless a policy focuses on achieving that outcome.</li> </ul>
249	Glossaries	Glossary	Amend	Add a definition of "No net loss" to read as follows: " <u>No net loss- Means no reasonably measurable overall reduction in the type, extent, long-term viability and functioning of indigenous biodiversity. When the term is applied in a policy context it has regard to the overall contribution of regulatory and non-regulatory methods as contained in local indigenous biodiversity strategies. It does not create a no adverse effects regime.</u> "	<ul style="list-style-type: none"> <li>• Policy 4.5.8 uses the term "no net loss" as an outcome to be achieved from offsetting.</li> <li>• As the RMA is not a "no effect" statute, "no net loss" is important and the term should be defined.</li> <li>• Contact suggests the definition in the Waikato RPS which was the subject of appeal and mediation and is now settled.</li> </ul>
249	Glossaries	Glossary	Amend	Amend the definition of "Reverse sensitivity" to read as follows: "Reverse sensitivity – <u>Arises where an established activity is causing adverse environmental impact to nearby land and an activity susceptible to those impact is proposed for that land. Is an effect under the RMA. It arises when an activity that may be sensitive to the effects of a lawfully established activity seeks to establish, expand or intensify in proximity to that activity (e.g. by resource consent application) or when activities susceptible to impacts from the established activity are proposed for that land (e.g. through a plan change).</u> If the new <u>incompatible use</u> is permitted, the established activity may be required to restrict its operations or mitigate its	The definition of reverse sensitivity misplaces the emphasis: The established activity may not be having an adverse environmental impact on nearby land. The adverse impact arises because and when the incompatible activity seeks to establish in proximity to the lawfully established activity.

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				effects to avoid adversely affecting the new activity.	
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>• Add a definition of “a high degree of naturalness” as follows:  <u>“A high degree of naturalness - Waters of superior water quality, where impacts of human activities are absent or minimal. Examples include water in national parks, wilderness areas, forest parks, reserves and other areas of high ecological significance.”</u> </li> <li>• Alternatively, add this explanation to Policy 2.2.12.</li> </ul>	To assist in identifying outstanding water bodies and wetlands in accordance with Policy 2.2.12 a).
261	Objectives on Kai Tahu values	Need 1.1	Amend	Amend paragraph 2 under "Need" under Objective 1.1 (p.16) as follows : “Local authorities need to find a way to <u>incorporate give effect to</u> these <u>principles in their decision making</u> , that ensures they are properly applied, and that accounts for the effects of resource management decisions on ...”	<ul style="list-style-type: none"> <li>• Phrase “give effect to” is a term of art under the RMA and case law has clarified that it has a different meaning from “take into account”.</li> <li>• It is important that the language used does not accidentally confuse the decision maker’s obligations.</li> </ul>
263	Objectives on Kai Tahu values	Introduction to Objective 1.1	Amend	<ul style="list-style-type: none"> <li>• Amend the first paragraph, second sentence of the explanatory text under Objective 1.1 (p.17) as follows: “It can be challenging to effectively incorporate these principles in resource management decision making, so deliberate measures need to be taken to ensure the principles are properly understood and <u>given effect to taken into account.</u>”</li> <li>• Amend the third paragraph of the explanatory text under Objective 1.1 (p.17) as follows: “A partnership approach, which involves Kai Tahu and elevates their values, rights and interests in decision making processes, enables the principles, including kaitiakitaka, to be <u>given effect taken into account</u> in an appropriately flexible way...”</li> </ul>	<ul style="list-style-type: none"> <li>• Supports Objective 1.1 which correctly identifies the RMA S8 obligation to take the principles of the Treaty of Waitangi into account.</li> <li>• Phrase “give effect to” is a term of art under the RMA and case law has clarified that it has a different meaning from “take into account”.</li> <li>• It is important that the language used does not accidentally confuse the decision maker’s obligations.</li> </ul>

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3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Write the objectives so that they deal with each of the regionally significant resource issues, defined outcomes, and provide clear reasons and explanations for Objectives and Policies and how they will be achieved, by who and where.	<ul style="list-style-type: none"> <li>• Appreciate the layout and intent, clear four high level outcomes.</li> <li>• Lack of definition around how development and growth interacts with restoring and retaining our finite resources.</li> <li>• Generalised non-specific objectives.</li> <li>• Need more detail on causes of problem and how and where to achieve integrated management</li> <li>• Policies need further detail on how the issues with objective policies and methods to address and or achieve them.</li> </ul>
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	<ul style="list-style-type: none"> <li>• Add objectives relating specifically to freshwater, beds of rivers lakes wetlands and their margins, coastal water, outstanding natural features and landscapes including seascapes, land and seascapes, natural character, including: <ul style="list-style-type: none"> <li>• The following biodiversity objective: "<u>Indigenous biodiversity in terrestrial, freshwater and coastal environments is maintained through</u></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• One general objective addressing all resources fails to provide sufficient guidance to decision makers and resource users.</li> <li>• The issues imply that degradation and loss may yet still happen whereas it's been happening for years already.</li> </ul>

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				<p><u>protection and is restored and/or enhanced where it has been lost or degraded so that the full range of naturally occurring ecosystems and habitats and their complement of flora and fauna is present across/characterises the region, and enhancement, and restoration particularly in places where biodiversity has been lost, or degraded."</u></p> <ul style="list-style-type: none"> <li>• The following objective: "<u>Human activity supports the healthy functioning and resilience of naturally occurring ecosystems including where integrated with production systems.</u>"</li> <li>• Add an explanation that this objective seeks to halt and more so reverse the decline in Otago's biodiversity, and how retaining and enhancing indigenous habitats, will help halt the decline and why this is important for Otago's identity and economy.</li> </ul>	
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	<p>Re write the Chapter to include / explain that "integration" requires that RPS be based on the following statement of fundamental principles:</p> <ul style="list-style-type: none"> <li>• Guardianship: All users of land and water accept the responsibilities of guardianship.</li> <li>• Sustainable Management: The values and life supporting capacity of Otago's natural and physical resources are recognised, maintained and enhanced.</li> <li>• Water - a public resource: to be managed in accordance with sustainability principles (First order priority considerations: the environment, customary uses, community supplies and stock water; Second order priority considerations incl: Irrigation, industry, renewable electricity generation, recreation and amenity.)</li> <li>• Natural character: The natural character (mauri) of the region's rivers, lakes, streams, wetlands and significant landscapes is preserved and enhanced.</li> <li>• Land-Use: Land management and water use systems are integrated so as to preserve soils and enhance environmental values and water quality.</li> <li>• Biodiversity: Flora, fauna (both indigenous and introduced) and their habitats on land and in water bodies are protected and valued.</li> <li>• Access: Public access to and along rivers, lakes, waterways and wetlands is maintained and, where appropriate, enhanced.</li> <li>• Caution: A pre-cautionary approach is taken when information is uncertain, unreliable or inadequate.</li> </ul>	Provides basis for integrated management plans across Districts.
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Oppose	<p>Re write the issues relating to Objective 2.1 to specifically address the following:</p> <ul style="list-style-type: none"> <li>• Cumulative effects of human activities, past and current on natural resources have resulted in loss of resource (e.g. extinct or nearly extinct</li> </ul>	<ul style="list-style-type: none"> <li>• The list of proposed issues is general and not specific to Otago's resources. The list does not include specific issues affecting specific natural and physical resources that are of regional significance.</li> <li>• The issues imply that degradation and loss may yet still happen whereas it's been happening for years already!</li> </ul>

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				<p>species and rare ecosystem types such as salines) or diminished value (e.g., freshwater ecosystems).</p> <ul style="list-style-type: none"> <li>• Over allocation (both quality and quantity) and degradation of freshwater resources.</li> <li>• Loss of indigenous habitats and species through land intensification and development, clearance of indigenous vegetation, tree planting.</li> <li>• Loss and degradation of wetlands.</li> <li>• Degradation and loss of resilience of indigenous ecosystems, through loss of area and fragmentation due to land use change, pests and weeds, climate change.</li> <li>• Loss of natural character along the margins of rivers lakes and the coast, through inappropriate land use and development.</li> <li>• Intensifying land use, resource exploitation and utility development threatening Outstanding Natural Landscapes and Features.</li> <li>• Insufficient inventory and data collection, monitoring and analysis of natural resource attributes and values.</li> <li>• Poor integration of land and water use management between agencies resulting in loss and degradation of natural resources.</li> <li>• Poor and inadequate awareness and education on biodiversity and systems interconnectedness.</li> </ul>	
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Oppose	Re write the issues associated to Objective 2.2 to specifically address the lack of and inconsistent inventory and identification, recognition and protection of biodiversity values, significant indigenous vegetation and significant habitats of indigenous fauna, outstanding natural features and landscapes.	<ul style="list-style-type: none"> <li>• The list of proposed issues is general and not specific to Otago's resources. The list does not include specific issues affecting specific natural and physical resources that are of regional significance.</li> <li>• The issues imply that degradation and loss may yet still happen whereas it's been happening for years already!</li> </ul>
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Oppose	Re write to read: "The values <u>and life supporting capacity</u> of Otago's natural and physical resources are recognised, maintained and enhanced ( <u>restored where identified necessary</u> )."	The life supporting capacity of air, water and soil and ecosystems also needs to be recognised, maintained, and enhanced or restored where it has been degraded or lost.
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Compile assessment frameworks of desired common values/attributes for Water quality, Air, Soil, Ecosystems & Biodiversity. Attach as Appendices similar to Schedules 4.5, 6 & 7.	No reason given.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	<ul style="list-style-type: none"> <li>• Re-name policy to read: "Managing for healthy freshwater ecosystems".</li> <li>• Amend a) to read: "a) Ensure healthy ecosystems in all Otago water bodies and their margins."</li> <li>• Amend b) to read: "b) Retain the <u>full natural</u> range of habitats and indigenous species supported by freshwater."</li> <li>• Retain (c) and (e) - (k) and their margins.</li> <li>• Refer to "restore good quality where degraded" in f).</li> </ul>	<ul style="list-style-type: none"> <li>• Header: The policy creates ambiguity as freshwater values are not defined, and can be conflicting.</li> <li>• a): Managing for healthy ecosystems should include all water bodies. The term "support" is unclear and should be changed to "ensure" for consistency with other policies.</li> <li>• b): This policy should be clear that it is the full range of habitats that needs to be retained as is stated in the NZ Biodiversity Strategy.</li> <li>• d): The terminology migratory patterns are imprecise and could be more related to behaviour than protecting the habitat requirements for all life cycle stages.</li> <li>• l): The RPS does not define important recreational values; this is a</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>Amend d) to read: "d) Protect migratory requirements for all life cycle stages of freshwater species, unless detrimental to indigenous species. And restore where impeded."</li> <li>Amend l) to read: "l) Protect recreation values".</li> <li>Refer also to water bodies and their margins in m).</li> <li>Add the following items to the policy: <ul style="list-style-type: none"> <li>g) <u>Avoid human induced erosion and sedimentation</u></li> <li>r) <u>Ensure all water bodies are safe for human health and contact recreation.</u></li> <li>s) <u>Avoid changes in hydrology which could adversely affect indigenous biodiversity.</u></li> <li>t) <u>Halt and reverse the decline of indigenous species.</u></li> <li>u) <u>Phase out the over allocation of freshwater that adversely affects water quality and in stream flows by 2035.</u></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>superfluous and restricting qualifier.</li> <li>Additional items to address the issues relating to the degradation and over allocation of freshwater resources.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	<ul style="list-style-type: none"> <li>Retain (a) - (c) and (f) - (k) as proposed</li> <li>Amend d) to read: "Maintain indigenous biodiversity and healthy ecosystems, enhance and restore degraded ecosystems and indigenous biodiversity."</li> <li>Amend e) to read: "Retain the full natural range of habitats and indigenous species supported by freshwater."</li> <li>Add new item: "l) Maintain riparian vegetation where it protects water quality and habitat and restore riparian vegetation where it fails to protect water quality."</li> <li>Add new item: "Protect recreational use and access to the margins of Otago's water bodies."</li> </ul>	<ul style="list-style-type: none"> <li>d): Not all ecosystems are currently healthy: need to provide for the restoration and enhancement of degraded ecosystems.</li> <li>e): This policy should be clear that it is the full range of habitats that needs to be retained as is stated in the NZ Biodiversity Strategy.</li> <li>l): A key tool for managing margins is to maintain and restore riparian vegetation.</li> <li>Margins of water bodies are important for recreation.</li> </ul>
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	<ul style="list-style-type: none"> <li>Amend title to "Managing for healthy coastal ecosystems".</li> <li>Amend a) to read: "Ensure healthy coastal ecosystems, and..."</li> <li>Amend to b) read: "Retain the full range of habitats and indigenous species in the coastal marine area."</li> <li>Amend (h) to read: "Protect recreation values"</li> <li>Retain (c) - (g) and (l) as proposed.</li> </ul>	<ul style="list-style-type: none"> <li>Header: The policy creates ambiguity as values are not defined, and can be conflicting.</li> <li>a): Term "support" is unclear and does not provide direction to decision makers. Use "Ensuring".</li> <li>b): This policy should be clear that it is the full range of habitats that needs to be retained as is stated in the NZ Biodiversity Strategy.</li> <li>h): The RPS does not define important recreational values, this is a superfluous and restricting qualifier.</li> </ul>
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Support	Support	<ul style="list-style-type: none"> <li>Need to manage burning to protect air quality for visual reasons.</li> <li>Incongruous with Policies 2.1.5 &amp; 2.1.7 &amp; ecoservicing.</li> </ul>
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	<ul style="list-style-type: none"> <li>Rewrite to manage soil impacts from intensive soil use.</li> <li>Amend b) to read: "b) maintain soil diversity and restore where it has been degraded."</li> <li>Add "k) protect significant undeveloped soils from disturbance"</li> </ul>	There is conflict between achieving values (a-e) and (f)
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	<ul style="list-style-type: none"> <li>Re-write heading to read: "Managing to achieve healthy natural ecosystems and indigenous biodiversity."</li> <li>Re-write the [1st sentence] to read: "Protect</li> </ul>	<ul style="list-style-type: none"> <li>The policy creates ambiguity as neither ecosystem nor biodiversity values are defined, and they can be conflicting.</li> <li>We need to managing adverse effects of pests and land use rather than managing ecosystems and indigenous biodiversity.</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>and support the healthy natural functioning of ecosystems, halt and reverse the decline in indigenous biodiversity and avoid significant and/or cumulative adverse effects on ecosystems and indigenous biodiversity, by:"</p> <ul style="list-style-type: none"> <li>• Amend a) to read: "Maintaining or enhancing good ecosystem health and function, intact natural processes, and indigenous biodiversity and habitats for indigenous species throughout Otago; and"</li> <li>• Amend b) to read: "Protecting, maintaining or enhancing areas of modified indigenous vegetation which contain indigenous biodiversity and habitats for indigenous species."</li> <li>• Amend c) to read: "Providing for buffers and linking existing habitats of indigenous species where opportunities exist."</li> <li>• Amend d) to read: "Protecting and optimising the hydrological services of tussock grasslands and other natural ecosystems."</li> <li>• "Protecting and sustaining natural resources ... protecting and improving where degraded habitats...for recreational, aesthetic, etc..."</li> </ul> <p>Retain e) to g) but reword to grammatically match above amendments.</p> <ul style="list-style-type: none"> <li>• Amend h) to read: "Avoid the adverse effects of pest species, prevent their introduction and prevent their spread."</li> </ul>	<ul style="list-style-type: none"> <li>• a) repeats the Act. Amend to make policy describe what is going to be done, rather than the outcome</li> <li>• b): Much of Otago's remaining indigenous vegetation has been significantly modified, yet it retains habitats for indigenous species, and seed sources for restoration and enhancement. These can provide seasonal food sources, and ecological links.</li> <li>• h): It is important to prevent rather than just reduce the spread of pests.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	<p>Add the following new items:</p> <ul style="list-style-type: none"> <li>• (As new item b))"Facilitating and supporting restoration of degraded natural ecosystems and indigenous habitats using indigenous species that naturally occur and/or previously occurred in the area."</li> <li>"As a priority identifying Nationally Endangered and Nationally Critical species and their habitats and managing threats to reduce and where practicable eliminate risk of further loss; and facilitate and support activities to protect and improve habitat"</li> <li>• (As new item c) ) "Avoiding fragmentation, reduction in size and extent of indigenous ecosystems and habitats of indigenous species."</li> <li>• "Avoiding any significant adverse effect as far as practicable, minimising adverse effects where total avoidance is impracticable, remedying and mitigating remaining adverse effects as far as practicable and offsetting any residual adverse effects that are more than minor."</li> <li>• "Facilitating and supporting the creation of new areas of indigenous vegetation and habitat for indigenous species, using species and processes inherently natural to the area."</li> </ul>	<ul style="list-style-type: none"> <li>• Restoration is needed in places where biodiversity has been lost and habitats degraded. Using eco sourced indigenous species that occur or once occurred will assist to maintain indigenous biodiversity.</li> <li>• Some indigenous biodiversity is under threat of extinction or becoming Nationally Endangered. This biodiversity needs to be identified and the critical threats actively managed to reverse the threat status</li> <li>• Biodiversity is lost through fragmentation, reduction in size and extent of habitats.</li> <li>• Biodiversity maintenance is not achieved if biodiversity that is lost is not replaced by enhancement measures under a biodiversity offset.</li> <li>• The creation of new habitat will be one way of reversing the decline of indigenous biodiversity.</li> <li>• The protection, sustenance and enhancement of indigenous biodiversity needs to be coordinated and strategic to ensure greatest efficiency and maximum benefit.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				• "Implementing policies a) to h) in a planned, strategic, prioritised and coordinated manner."	
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Support	Support.	Adopts the widely accepted methodology promoted by the NZILA.
39	Natural resource value management - general	Policy 2.1.8 - Recognising the values of natural character in the coastal environment	Support	Support.	Could also apply to the riparian and lacustrine environments.
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Add new policy: "2.2.8 Identifying the landward extent of the margins of lakes, rivers and wetlands Identify the landward extent of margins of all freshwater bodies using the following criteria: a) area or landform where active riparian or lacustrine and/or wetland processes, influences or qualities are significant including legible historic processes and influences; and b) the area dominated by vegetation associated with the waterbodies and providing habitat for species dependent on the waterbody and its margins including dry to wet environments; and c) any landscape and natural feature that significantly contributes to the natural character, visual amenity and recreational value of the [substitute word for coast, e.g. waterbody and its margin] e) the relationship of takata whenua with the margins of freshwater bodies"	<ul style="list-style-type: none"> <li>• Spatial extent needs to be defined to manage natural character of the margins of freshwater bodies. The interpretation of "margin" has varied considerably.</li> <li>• A landscape approach has been taken to defining the coastal margin, a similar approach should be taken to freshwater body margins for meaningful management of natural character.</li> <li>• Lack of definition has resulted in degradation of natural character within river corridors.</li> </ul>
43	Highly valued natural resources - indigenous biodiversity	Schedule 5 - Criteria for the assessment of significant indigenous vegetation and habitat of indigenous fauna	Amend	<ul style="list-style-type: none"> <li>• Representative: "An area of indigenous vegetation or habitat of indigenous fauna that is representative, typical or characteristic of the natural diversity of the relevant ecological district."</li> <li>• Diversity "and Pattern": "An area that supports a high diversity of indigenous ecosystem types, indigenous taxa or has changes in species composition reflecting the existence of diverse natural features or gradients."</li> <li>• Ecological Context: Add vegetation to a)</li> </ul>	<ul style="list-style-type: none"> <li>• The description does not adequately describe representative and does not include habitats of indigenous fauna.</li> <li>• Vegetation types or communities that are closest to the composition and structure that would have been expected in 1840 need to be included</li> <li>• Pattern refers to changes in the distribution and abundance of species/habitats across the site and is driven by underlying variation in the environment.</li> <li>• Some areas can have important connectivity values for the dispersal of indigenous plants.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	<ul style="list-style-type: none"> <li>• Amend a) to read: "a) Avoiding adverse effects including cumulative effects on significant biodiversity that is vulnerable or irreplaceable and on those values which contribute to the area or habitat being significant; and"</li> <li>• Retain b) to e) .</li> <li>• Amend f) to read: "f) encouraging, facilitating and supporting enhancement...."</li> </ul>	Vulnerable and irreplaceable habitats will be significant, but these particular values may not be signified as contributing to the sites being significant.
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend to read: "Identify the outstanding natural landscapes and features including coastal features and landscapes; and identify the attributes, qualities and features that contribute to their outstanding status using the methodology set out in Schedule 4."	Needs more guidance - the attributes, qualities and features underlying outstanding status need to be identified.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Make the following amendments: <ul style="list-style-type: none"> <li>• a): "avoiding adverse effect on those attributes and qualities which ..."</li> <li>• d): "[...] where those species do not have an actual or potential adverse effect on indigenous biodiversity, or landscape values in other areas."</li> <li>• e): "preventing spread" instead of "reducing". Add "reducing presence".</li> <li>• f): "encouraging, facilitating and supporting ...."</li> <li>• Add: "h) encouraging facilitating and supporting mitigation of existing adverse effects to enhance outstanding natural character."</li> </ul>	No reason given.
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Reword policy header: "Identifying the attributes, qualities and features that give other landscapes and natural features amenity value".	<ul style="list-style-type: none"> <li>• All landscape has amenity value.</li> <li>• RMA does not distinguish between important and significant or "special amenity" or "visual amenity" landscape and other landscape. - it is just straight out amenity value.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Make the following amendments: <ul style="list-style-type: none"> <li>• 1st sentence to read: "Protect or enhance the amenity of other landscapes and natural features, by:"</li> <li>• a) to read: "a) avoiding adverse effects on those attributes, qualities and features that contribute significantly to their amenity value".</li> <li>• b) &amp; c): Replace "values" with "attributes, qualities and features";</li> <li>• d): "[...] where those species do not have an actual or potential adverse effect on indigenous biodiversity, or landscape values in other areas."</li> <li>• e): "preventing spread" instead of "reducing". Add "reducing presence".</li> <li>• f): "encouraging, facilitating and supporting ...."</li> <li>• Add "h) encouraging facilitating and supporting mitigation of existing adverse effects to improve amenity values".</li> </ul>	No reason given.
50	Highly valued natural resources - the coastal environment	Policy 2.2.8 - Identifying areas of high and outstanding natural character in the coastal environment	Amend	Reword heading: "Identify areas of high but not outstanding natural character in the coastal environment and the attributes, qualities and features contributing to the natural character, using Schedule 4 factors:"	This policy should only be about coastal landscape that is of high natural character but not outstanding
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	<ul style="list-style-type: none"> <li>• Reword as for 2.2.4 and 2.2.6 re changing word "values" for attributes qualities and features and also other changes already suggested.</li> <li>• Add "h) encouraging facilitating and supporting mitigation of existing adverse effects to improve natural character."</li> </ul>	No reason given.
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Same wording change re values as for 2.2.4. [i.e.: <ul style="list-style-type: none"> <li>• a): "avoiding adverse effect on those attributes and qualities which ..."</li> <li>• d): "preventing spread" instead of "reducing". Add "reducing presence".</li> </ul>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• e): "encouraging, facilitating and supporting ..."</li> <li>• Add: "f) encouraging facilitating and supporting mitigation of existing adverse effects to enhance [outstanding water bodies and wetlands]."</li> </ul>	
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Support	Support.	No reason given.
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	<ul style="list-style-type: none"> <li>• Add a new objective that reflects the requirements for sustainable management, protecting the life supporting capacity of productive rural ecosystems.</li> <li>• Remove policies relating to rural land use from section 4.3 and embrace under new Objective.</li> </ul>	Section 4.3 contains a grab bag of activities which are difficult to embrace under land use sustainability, which is a significant regional issue that needs to be addressed in the RPS, but which is not readily identifiable.
142	Objectives on use and enjoyment of natural and built environment	Issue 4.5 - Adverse effects from the use of Otago's natural and physical resources	Amend	Amend to read: "Otago's natural ecosystems and indigenous biodiversity and areas of significant indigenous vegetation and significant habitats of indigenous fauna and outstanding landscapes, for example..."	Otago's areas of biodiversity, natural ecosystems are under threat, as well as Otago's significant areas of biodiversity.
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	<ul style="list-style-type: none"> <li>• Amend to read: "Managing for sustainable rural activities Ensure sustainable management of Otago's land resources to meet the present and reasonably foreseeable needs of Otago's communities by:"</li> <li>• Amend a): "Protect the life supporting capacity of land resources and ecosystems and enable sustainable farming and other rural activities; and".</li> </ul>	This policy fails to implement S5 of the RMA.
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Support	<ul style="list-style-type: none"> <li>• Retain.</li> <li>• Promote and encourage, if not regulate, land uses that reduce biomass such as burning and grazing.</li> </ul>	<ul style="list-style-type: none"> <li>• Support the proposals to manage land use in dry catchments and to avoid reduction in water yields, and methods requiring local authorities to restrict and control forestry planting, and conversion of dryland grasslands to protect these values especially among the valley floor and walls. These remnant systems are some of last vestiges of locally endemic highly threaten species.</li> <li>• Natural water harvesting catchments also need to be preserved and restored.</li> <li>• What does minimise mean? Why not simply avoid?</li> </ul>
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Support	Retain (a).	Support the importance of avoiding mineral and gas exploration, extraction and processing in Otago's significant and outstanding areas.
161	Objectives on use and enjoyment of natural and built environment	Objective 4.4 - Otago's communities can make the most of the natural and built resources available for use	Amend	Statement should reference fundamental principles – specifically water use priorities.	No reason given.
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	<ul style="list-style-type: none"> <li>• Include new sub para e): "Efficiency of water allocation and use taking into account fundamental principles and preserving environmental values."</li> <li>• Enable small scale on-farm water harvesting and storage to reduce pressure on water bodies during periods of low flows.</li> </ul>	Large storage lakes can inundate significant aquatic and terrestrial indigenous biodiversity and result in adverse visual effects (e.g., Manuherikia irrigation storage Falls Dam).

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Avoid locating new (large) water storage where there would be adverse impacts on significant indigenous biodiversity and outstanding natural landscapes and features.</li> </ul>	
165	Making the most of available resources	Policy 4.4.3 - Encouraging environmental enhancement	Amend	<ul style="list-style-type: none"> <li>• Retain and amend to read "Encourage, facilitate and support activities that..."</li> <li>• Use "and/or" instead of "or".</li> <li>• Add: <ul style="list-style-type: none"> <li>• "restore natural character and ecosystem function of riparian corridors".</li> <li>• "Protect natural features".</li> <li>• "Control or eradicate pest species".</li> </ul> </li> </ul>	Projects may do more than one thing, hence suggested "and / or".
172	Management of adverse effects	Policy 4.5.5 - Controlling the introduction and spread of pest plants and animals	Amend	<ul style="list-style-type: none"> <li>• Amend to read: "Preventing the introduction and spread of pest plants and animals Control the adverse effects of pest species, prevent their introduction and spread, to safeguard:..."</li> <li>• Add the following items: "productive values", &amp; "Landscape and visual values and natural character".</li> <li>• a) - g): Change the "word" values as [in policy] 2.2.4.</li> </ul>	No reason given.
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Support	Retain c).	Biodiversity offsetting should not be applied to justify impacts on vulnerable and irreplaceable biodiversity values or biodiversity values which can not be offset.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Support	Retain Method 4.1.4.	No reason given.
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	<p>Add method 4.1.13 to specify that City and District plans will set objectives, policies and methods to implement policies 2.1.6 – Managing for ecosystem and indigenous biodiversity values and 2.2.2 – Managing significant indigenous vegetation and significant habitats of indigenous fauna, by including provisions to:</p> <p>a) Manage indigenous vegetation clearance using case by case assessments to determine whether an area of indigenous vegetation or habitat is significant and warrants protection</p> <p>b) Include appropriate regulatory methods that control the clearance or modification of, indigenous vegetation and habitats of indigenous fauna.</p> <p>c) Require ecological assessments to accompany a resource management proposal or plan for an activity or development that may affect areas of indigenous vegetation and habitats of indigenous fauna."</p>	<ul style="list-style-type: none"> <li>• It is unlikely that all areas of significant indigenous vegetation and significant habitats of indigenous fauna will be identified at one time.</li> <li>• It is important that there are mechanisms to identify sites that meet the criteria at the time of resource consents.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	<ul style="list-style-type: none"> <li>• Amend a) to read: "Significant indigenous vegetation and significant habitats of indigenous fauna in using criteria for terrestrial and freshwater in Schedule 5 (as amended by this submission) and for the coastal marine area in Schedule xxxx".</li> </ul>	<ul style="list-style-type: none"> <li>• Significant indigenous vegetation and significant habitats of indigenous fauna needs to be identified consistently by all districts using the same criteria, as specified in the Schedules.</li> <li>• Indigenous vegetation and habitats do not conform to district boundaries but the proposed criteria are relevant for all districts.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				• Retain b)-f).	
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Amend	New [Method] 7.3.5 to promote/encourage transition to electric powered vehicles	Reduce carbon emissions
240	Anticipated Environmental Results	AER 3.5 - The use of local renewable energy sources in Otago increases and reliance on fossil fuels decreases	Amend	Add positive indicators: increasing uptake of domestic solar generation and use of electric powered transport; increase in available public transport and increase of "freight efficiency" (in other words increase in buses and trains).	Reduce carbon emissions
269	Objectives on high quality natural resources	Introduction to Objective 2.1	Oppose	Re-write the introduction to Objective 2.1 to better reflect the purposes of regional Policy statements and explain the importance of safeguarding the life supporting capacity of ecosystems and resources, and maintaining biodiversity.	<ul style="list-style-type: none"> <li>• It is not possible to maintain or enhance the resources to meet all values.</li> <li>• The RMA requires that the life-supporting capacity of air, water, soil, and ecosystems is safeguarded and adverse effects on the environment avoided remedied or mitigated.</li> <li>• The purpose of an RPS also includes providing for the integrated and sustainable management of the natural and physical resources which better reflects the focus of objective 2.1.</li> </ul>

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Overall approach	Whole Regional Policy Statement (general opposition)	Amend	In the event that the amendments sought in the submission are not implemented withdraw the proposed RPS.	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Support	Retain Objective 2.1.	It is important that natural and physical resources (including regionally significant and critical infrastructure) are identified and relevant protection measures are provided for.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	• Amend p) as follows: "p) Maintain the ability of existing infrastructure <u>and essential structures</u> to operate within their design parameters."	<ul style="list-style-type: none"> <li>• It is important that existing infrastructure and essential structures are provided for. Many of the regionally significant infrastructure and essential structures located on the bed of lakes rivers or lakes, or their margins, may not be able to locate elsewhere.</li> <li>• Essential structures represent significant capital investment and they can provide economic and social benefits.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Insert new clause (m) as follows: " <u>(m) provide for the current and reasonably foreseeable future needs and cultural, economic and social wellbeing of people and the community by enabling the use and development of river and lake beds where appropriate.</u> "	<ul style="list-style-type: none"> <li>• In order to achieve the balance of values required by section 5(2) of the Act, there should be policies that provide for the use and development of river and lake beds, where this is appropriate.</li> <li>• Does not provide for growth and development opportunities in the Region, which are important for Otago's social and economic wellbeing.</li> </ul>
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Insert new clause (j) as follows: " <u>(j) provide for the current and reasonably foreseeable future needs and cultural, economic and social wellbeing of people and the community by enabling the use and development of coastal water where appropriate.</u> "	<ul style="list-style-type: none"> <li>• In order to achieve the balance of values required by section 5(2) of the Act, there should be policies that provide for the use and development of coastal water, where this is appropriate.</li> <li>• Does not provide for growth and development opportunities in the Region, which are important for Otago's social and economic wellbeing.</li> </ul>
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Amend	Amend Objective 2.2 as follows: "Otago's significant and highly-valued natural resources are identified, and <del>protected</del> <u>maintained</u> or <u>where appropriate</u> enhanced."	<ul style="list-style-type: none"> <li>• Too restrictive and generic,</li> <li>• It could be construed that no development or use would be deemed to be acceptable</li> <li>• The focus should be to identify such resources, and to maintain and, where appropriate, enhance the values that contribute to the significance of the resource.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend 1st sentence as follows: "Protect and <u>where appropriate</u> enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: ..."	<ul style="list-style-type: none"> <li>• In King Salmon, "avoid" was held to have a greater weight than if the environmental bottom line approach was adopted.</li> <li>• Protecting areas of significant indigenous fauna, as required under the RMA, can be achieved with the appropriate management of adverse effects rather than the outright avoidance of all adverse</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested effects.
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend Policy 2.2.4 as follows: "Policy 2.2.4 Managing outstanding natural features, landscapes, and seascapes Protect <u>where appropriate</u> , enhance and restore the values of outstanding natural features, landscapes and seascapes, by: a. Avoiding, <u>remedying or mitigating</u> adverse effects on those values which contribute to the significance of the natural feature, landscape or seascape; <del>and</del> <del>b. Avoiding, remedying or mitigating other adverse effects on other values; and</del> ..."	<ul style="list-style-type: none"> <li>• In King Salmon, "avoid" was held (by the majority) to have a greater weight than if the environmental bottom line approach was adopted.</li> <li>• Protecting areas of outstanding natural landscape and features, as required under the RMA, can be achieved with the appropriate management of adverse effects rather than the outright avoidance of all adverse effects.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Amend Policy 2.2.6 as follows: "Policy 2.2.6 Managing special amenity landscapes and highly valued natural features <del>Protect. Maintain or where appropriate</del> enhance the values of special amenity landscapes and highly valued natural features, by: a. Avoiding, <u>remedying or mitigating</u> <del>significant</del> adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; <del>and</del> <del>b. Avoiding, remedying or mitigating other adverse effects on other values; and...</del> "	<ul style="list-style-type: none"> <li>• While Aurora accepts that it is appropriate to manage the adverse effects on amenity values, it does not agree that the focus of this policy should be to "protect" such landscapes.</li> <li>• "Avoid" establishes a very high threshold test that is not considered to be appropriate.</li> </ul>
49	Highly valued natural resources - the coastal environment	Policy 2.2.7 - Identifying the landward extent of the coastal environment	Amend	Insert a map defining the extent of the coast environment including identification of regionally significant infrastructure.	<ul style="list-style-type: none"> <li>• Policy generally consistent with Policy 1 of the NZCPS.</li> <li>• The PRPS should be more definitive in identifying the extent of the coastal environment in Otago.</li> <li>• It is appropriate that existing physical resources or built form, including infrastructure, is recognised within the coastal environment, and that the modification that such infrastructure has made is recognised and provided for.</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend Policy 2.2.9 as follows: "Policy 2.2.9 Managing the natural character of the coastal environment Preserve or <u>where appropriate</u> enhance the natural character values of the coastal environment, by: a. Avoiding, <u>remedying or mitigating</u> adverse effects on those values which contribute to the outstanding natural character <u>or high natural character values</u> of an area; and <del>b. Avoiding, significant adverse effects on those values which contribute to the high natural character values of an area; and...</del> "	<ul style="list-style-type: none"> <li>• In King Salmon, "avoid" was held (by the majority) to have a greater weight than if the environmental bottom line approach was adopted.</li> <li>• Preserving natural character values of the coastal environment can be achieved with the appropriate management of adverse effects rather than the outright avoidance of all adverse effects.</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend a) as follows: "a. Avoiding significant adverse effects, including cumulative effects, on those values which contribute to the water body or wetland being outstanding, <u>where it is practicable to do so</u> ; and".	<ul style="list-style-type: none"> <li>• There should be scope to allow for the remediation or mitigation of adverse effects, including significant adverse effects.</li> <li>• In King Salmon, "avoid" was held to have a greater weight than if the environmental bottom line approach was adopted.</li> </ul>
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical	Support	Retain Policy 3.1.1.	<ul style="list-style-type: none"> <li>• Infrastructure is a significant physical resource, essential to the social and economic wellbeing of the community, represents</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		environmental constraints			considerable investment and is unlikely to be readily replaced or duplicated. <ul style="list-style-type: none"> <li>Such infrastructure is already located in areas subject to environmental constraints.</li> </ul>
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Support	Retain Objective 3.2.	<ul style="list-style-type: none"> <li>There may be cases where it is necessary to locate regionally significant and critical infrastructure and essential structures in areas subject to hazards; this risk can be managed through appropriate measures, rather than avoidance.</li> <li>Infrastructure providers are in the best position to assess the risks of locating network utility structures in potential hazard areas in terms of continuity of electricity services.</li> </ul>
83	Natural hazard risk	Policy 3.2.3 - Assessing natural hazard consequence	Support	Retain Policy 3.2.3.	<ul style="list-style-type: none"> <li>There may be cases where it is necessary to locate regionally significant and critical infrastructure and essential structures in areas subject to hazards; this risk can be managed through appropriate measures, rather than avoidance.</li> <li>Infrastructure providers are in the best position to assess the risks of locating network utility structures in potential hazard areas in terms of continuity of electricity services.</li> </ul>
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Support	Retain Policy 3.2.6.	<ul style="list-style-type: none"> <li>Infrastructure is a significant physical resource and is essential to the community's social and economic wellbeing.</li> <li>Such infrastructure is already located in natural hazard risk areas and is unlikely to be replaced or duplicated.</li> <li>Appropriate to recognise that regionally significant and critical infrastructure and essential structures need to be located in natural hazard risk areas: Support ability to design electricity network assets such that the potential adverse effects of natural hazards are minimised.</li> </ul>
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	<ul style="list-style-type: none"> <li>Retain Policy 3.2.7.</li> <li>Extend clauses e) and f) to encompass Critical Infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>Infrastructure is a significant physical resource and is essential to the community's social and economic wellbeing.</li> <li>Such infrastructure is already located in natural hazard risk areas and is unlikely to be replaced or duplicated.</li> <li>Clauses e) and f) considered appropriate.</li> </ul>
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use		Amend Policy 3.4.1 c) as follows: "c) Managing <del>urban</del> - growth..."	<ul style="list-style-type: none"> <li>The development of infrastructure can also be required in rural areas, where changes in land use (e.g. dairy conversions) can place pressure on existing infrastructure supply.</li> <li>Urban development is addressed elsewhere in the RPS.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend Policy 3.4.2 as follows: "Policy 3.4.2 Managing <u>Regionally Significant and Critical</u> infrastructure activities Manage infrastructure activities, to: ... <u>h. Restricting the establishment of those activities that may result in reverse sensitivity effects.</u> "	<ul style="list-style-type: none"> <li>Policy 3.4.2 should apply specifically to Regionally Significant and Critical Infrastructure.</li> <li>The policy should be extended to refer to restricting activities that may potentially result in reverse sensitivity.</li> </ul>
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend policy header as follows: "Policy 3.4.3 Designing lifeline utilities and facilities for essential or emergency services <u>and critical infrastructure</u> ."	The scope of the policy should be extended to include Critical Infrastructure.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	Amend policy header as follows: "Policy 3.4.4 Managing hazard mitigation measures, lifeline utilities, and essential and emergency services <u>and critical infrastructure</u> ."	The scope of the policy should be extended to include Critical Infrastructure.
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	<ul style="list-style-type: none"> <li>Amend Objective 3.5 as follows:  "Infrastructure of national and regional significance, including roads, rail, electricity</li> </ul>	<ul style="list-style-type: none"> <li>Distribution assets are regionally significant and should be identified in this section of the proposed RPS. While it is noted that provision has been made for distribution assets within proposed policy</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				generation, and transmission <u>and distribution</u> , and telecommunications <u>networks</u> , are part of a national network, and contribute to the economic and social wellbeing of the nation. It is important to recognise the benefits of this infrastructure, such as to the economy and to achieving community resilience, as well as managing any adverse effects on Otago's natural resources."	3.6.5, locating it in a different section of the plan suggests that the activities are somehow separated. • There are three stages of electric power supply; generation, transmission and distribution, and provision should be made within the PRPS for the activities associated with these activities.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend b) as follows: "b. Electricity transmission <u>and distribution</u> infrastructure; and".	• Aurora's distribution assets are regionally significant and should be identified. • Although provision has been made for distribution assets in policy 3.6.5, locating it in a different section of the plan suggests that the activities are somehow separated. • There are three stages of electric power supply; generation, transmission and distribution, and provision should be made within the PRPS for the activities associated with these activities.
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	Retain Policy 3.5.3.	Critical Infrastructure can be vulnerable to inappropriate subdivision or proximity to land use development, as such activities can restrict access and affect the ability to maintain network assets. The protection of such corridors will assist in ensuring that Aurora can continue to provide a resilient electricity network.
112	Energy	Policy 3.6.4 - Enabling more efficient transport of electricity	Amend	Insert provisions relating to regionally significant and critical infrastructure (including electricity distribution assets) under Objective 3.4 and Objective 3.6.	Including Policy 3.6.4 under Objective 3.6 is misplaced and disjoins the consideration of the regionally significant electricity network in its entirety.
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	Insert provisions relating to regionally significant and critical infrastructure (including electricity distribution assets) under Objective 3.4 and Objective 3.6.	Including Policy 3.6.5 under Objective 3.6 is misplaced and disjoins the consideration of the regionally significant electricity network in its entirety.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Add a new clause as follows: "c) ...; <u>or d) Avoid conflicts with existing uses and protect existing essential structures.</u> "	Public access may also need to be restricted in order to protect the performance and operation of existing activities and essential structures.
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend e) as follows: "e. Providing for other activities that have a functional need to locate in rural areas, including <u>regionally significant infrastructure</u> , tourism and recreational activities that are of a nature and scale compatible with rural activities."	It is important that provision is made within Policy 4.3.1 to provide for regionally significant infrastructure.
166	Objectives on use and enjoyment of natural and built environment	Objective 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Support	Retain Objective 4.5.	Support in so far as this objective seeks to ensure that potential adverse effects of regionally significant infrastructure are minimised; particularly instances where assets are located in areas of significant value.
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Support	Retain Policy 4.5.7.	It is appropriate that measures are provided to enable potential adverse effects of regionally significant and critical infrastructure to be offset in instances where there is a functional necessity to locate in significant or outstanding areas.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Insert New Method" " <u>Method 4 - 4.1.13</u> <u>City or district plans will implement Policy 3.4.2 (e) and 3.5.3 by:</u> <u>i. identifying Regionally Significant and Critical Infrastructure corridors on the Planning maps;</u> <u>and</u> <u>ii. include provisions managing land use</u>	Implementation methods have not been included within the PRPS that would implement both Policy 3.4.2(e) (Managing infrastructure activities) and Policy 3.5.3 (Protecting infrastructure of national or regional significance).

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<u>activities within these corridors to address potential reverse sensitivity effects.</u> "	
249	Glossaries	Glossary	Amend	<p>Insert definition of critical infrastructure as follows:</p> <p><u>" Critical infrastructure: Infrastructure necessary to provide services which, if interrupted, would have a serious effect on the communities within the Region or a wider population, and which would require immediate reinstatement. This includes any structures that support, protect or form part of critical infrastructure. Critical infrastructure includes:</u></p> <ol style="list-style-type: none"> <li><u>1) regionally significant airports</u></li> <li><u>2) regionally significant ports</u></li> <li><u>3) gas storage and distribution facilities</u></li> <li><u>4) electricity substations, networks, and distribution installations, including the electricity distribution network</u></li> <li><u>5) supply and treatment of water for public supply</u></li> <li><u>6) storm water and sewage disposal systems</u></li> <li><u>7) telecommunications installations and networks</u></li> <li><u>8) strategic road and rail networks (as defined in the Regional Land Transport Strategy)</u></li> <li><u>9) petroleum storage and supply facilities</u></li> <li><u>10) public healthcare institutions including hospitals and medical centres</u></li> <li><u>11) fire stations, police stations, ambulance stations, emergency coordination facilities.</u>" </li></ol>	Such definitions are used in other Regional Policy Statement documents within New Zealand, and provide greater certainty around the nature and type of infrastructure that is considered "critical" in the regional context.
249	Glossaries	Glossary	Amend	<p>Insert definition of essential structures as follows:</p> <p><u>" Essential structures: Structures that support or form part of:</u></p> <ol style="list-style-type: none"> <li><u>(1) a maritime, road or rail transport network or service;</u></li> <li><u>(2) water supply, including irrigation infrastructure;</u></li> <li><u>(3) a telecommunications or radio-communication network;</u></li> <li><u>(4) an energy generation, supply or transmission facility or distribution network;</u></li> <li><u>(5) a flood-protection work or facility;</u></li> <li><u>(6) water containment, flow or diversion infrastructure;</u></li> <li><u>(7) a water level or flow-measurement facility;</u></li> <li><u>(8) a drainage or sewerage system; or</u></li> <li><u>(9) the infrastructure forming parts of other network utilities.</u> <p><u>This includes any structures that support essential infrastructure."</u></p> </li></ol>	Such definitions are used in other Regional Policy Statement documents within New Zealand, and provide greater certainty around the nature and type of essential structures associated with Regionally Significant Infrastructure.
249	Glossaries	Glossary	Amend	<p>Insert definition of regionally significant infrastructure as follows:</p> <p><u>" Regionally significant infrastructure</u> Regionally significant infrastructure is:</p> <ol style="list-style-type: none"> <li><u>(1) Strategic land transport network and arterial</u></li> </ol>	Such definitions are used in other Regional Policy Statement documents within New Zealand, and provide greater certainty around the nature and type of infrastructure that is significant on a regional scale.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<u>roads</u> <u>(2) Dunedin Airport</u> <u>(3) Queenstown Airport</u> <u>(4) Commercial maritime facilities at Port Otago</u> <u>(5) Telecommunication facilities</u> <u>(6) National, regional and local renewable electricity generation activities of any scale</u> <u>(7) The electricity transmission and distribution networks</u> <u>(8) Sewage collection, treatment and disposal networks</u> <u>(9) Community land drainage infrastructure</u> <u>(10) Community potable water systems</u> <u>(11) Established community-scale irrigation and stockwater infrastructure</u> <u>(12) Transport hubs</u> <u>(13) Bulk fuel supply infrastructure including terminals, wharf lines and pipelines."</u>	
258	Other comments	Consequential amendments & other amendments providing relief	Amend	Such further or other relief as is appropriate or desirable in order to take account of the concerns expressed in submission.	No reason given.
270	Objectives on high quality natural resources	Introduction to Objective 2.2	Amend	Amend the introduction to Objective 2.2 (p.32) as follows: "Otago has many unique landscapes, natural features and areas of indigenous biodiversity which are nationally or regionally important. <u>These resources should be maintained and where appropriate enhanced.</u> <del>Giving these a higher level of protection ensures they will be retained, while consumptive use of resources will be directed to areas where adverse effects are more acceptable."</del>	<ul style="list-style-type: none"> <li>Objective too restrictive and generic.</li> <li>The focus should be to identify such resources, and to maintain and, where appropriate, enhance the values that contribute to the significance of the resource.</li> </ul>
285	Objectives on resilience, health and safety	Introduction to Objective 3.4	Amend	Amend Explanation to Objective 3.4 (p.56) as follows: "It is essential for Otago's economy [...]. Local authorities <u>and providers of Regionally Significant Infrastructure</u> have a role to play, to ensure that the local and regional infrastructure needs are being met."	Should recognise that providers of Regionally Significant Infrastructure have a role to play to ensure infrastructure needs are met.
286	Objectives on resilience, health and safety	Introduction to Objective 3.5	Amend	Amend the introduction to Objective 3.5 (p. 59) as follows: "Infrastructure of national and regional significance, including roads, rail, electricity generation, <del>and</del> transmission <u>and distribution</u> , and telecommunications <u>networks</u> , <del>are part of a national network, and</del> contribute to the economic and social wellbeing of the nation. It is important to recognise the benefits of this infrastructure, such as to the economy and to achieving community resilience, as well as managing any adverse effects on Otago's natural resources."	<ul style="list-style-type: none"> <li>Aurora's distribution assets are regionally significant and should be identified.</li> <li>Although provision has been made for distribution assets in policy 3.6.5, locating it in a different section of the plan suggests that the activities are somehow separated.</li> <li>There are three stages of electric power supply; generation, transmission and distribution, and provision should be made within the PRPS for the activities associated with these activities.</li> </ul>

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
24	Chapter B2 - High quality natural	Chapter B2 - general requests	Support	• Support the recognition of the importance of	• Although the narrow-leaved snow tussock grasslands can sustain

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	resources			upland snow grasslands in Policies 2.1.2, 2.1.6, 2.1.7, 2.2.1, 2.2.4, 2.2.5 and 2.2.6, as well as in Policies 2.1.1, 2.2.3 and 2.3.3 (for the role of those grasslands in catchment yields).	periodic burning (under conditions), the higher elevation, shorter slim sown tussock grassland are much more vulnerable to pastoral management practices. <ul style="list-style-type: none"> <li>The maintenance of the latter in a healthy state is most important for their associated indigenous biodiversity, their ability to maximise water yield (as demonstrated by various studies), and also for their landscape and recreational values.</li> <li>These grasslands are much easier to retain than to restore, once lost.</li> </ul>
62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Support	Support.	The integrated management of water is highly desirable, to ensure responsible distribution while ensuring sufficient remains in the natural courses to satisfy the needs of the aquatic indigenous fauna and flora.
65	Chapter B3 - Resilience, health and safety	Chapter B3 - general requests	Did not specify	Address the critical issues of climate change responsibly and urgently, particularly the opportunities for mitigation [...] of climate change. <ul style="list-style-type: none"> <li>Apply precautionary principles to these issues.</li> </ul>	<ul style="list-style-type: none"> <li>Critical issues of our time.</li> <li>Mitigation will reduce the need for adaptation which is likely to be both more demanding and costly.</li> <li>The precautionary approach is likely to be as relevant here as it is for what the draft RPS recognises for minimising the risk of natural hazards (Policy 3.2.8).</li> </ul>
108	Energy	Policy suite 3.6 - Energy supplies to Otago's communities are secure and sustainable	Amend	Identify, in the RPS, areas which are inappropriate for wind farm development in Otago, on the basis of [Meridian Energy's proposed Hayes Wind Farm] case.	<ul style="list-style-type: none"> <li>Additional wind farms is a predictable future development.</li> <li>They would be unacceptable in some Otago areas, on the basis of high landscape values, as recognised by the Environment Court in its decision on the Hayes Wind Farm.</li> <li>The Parliamentary Commissioner for the Environment has made recommendations for regional councils to assist with such a role.</li> </ul>
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Support	Supported.	<ul style="list-style-type: none"> <li>Relates to minimising the emissions of greenhouse gases.</li> <li>Public relations and education of the general public will be an important aspect of implementing these policies.</li> </ul>
112	Energy	Policy 3.6.4 - Enabling more efficient transport of electricity	Support	Supported.	<ul style="list-style-type: none"> <li>Relates to minimising the emissions of greenhouse gases.</li> <li>Public relations and education of the general public will be an important aspect of implementing these policies.</li> </ul>
114	Energy	Policy 3.6.6 - Reducing long term demand for fossil fuels	Support	Supported.	<ul style="list-style-type: none"> <li>Relates to minimising the emissions of greenhouse gases.</li> <li>Public relations and education of the general public will be an important aspect of implementing these policies.</li> </ul>
161	Objectives on use and enjoyment of natural and built environment	Objective 4.4 - Otago's communities can make the most of the natural and built resources available for use	Support	Supported.	<ul style="list-style-type: none"> <li>Support as emphasises the importance of "water harvesting" and of "efficient water allocation and use".</li> <li>The value of potable fresh water for a multitude of uses, both consumptive and non-consumptive, is becoming increasingly appreciated, particularly in water-short regions such as Central Otago, the more so.</li> <li>Water must be distributed responsibly, ensuring sufficient remains in the natural courses to satisfy the needs of the aquatic indigenous fauna and flora.</li> <li>Concerned that water is apparently over-allocated in some regions.</li> </ul>
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Support	Supported.	<ul style="list-style-type: none"> <li>Support as emphasises the importance of "water harvesting" and of "efficient water allocation and use".</li> <li>The value of potable fresh water for a multitude of uses, both consumptive and non-consumptive, is becoming increasingly appreciated, particularly in water-short regions such as Central Otago, the more so.</li> <li>Water must be distributed responsibly, ensuring sufficient remains in the natural courses to satisfy the needs of the aquatic indigenous fauna and flora.</li> <li>Concerned that water is apparently over-allocated in some regions.</li> </ul>
207	Method 7 - Strategies and Plans	Method 7.4 - Pest management	Amend	A greater role in the containment of Lodgepole	<ul style="list-style-type: none"> <li>Wilding conifers are officially recognised as a national problem, with</li> </ul>

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	(non-RMA)	strategy		pine and a strategy to deal with commercial species of conifer as wildings, particular in the extensive upland grasslands of the province.	a National Strategy to assist with their containment. <ul style="list-style-type: none"> <li>• While <i>Pinus contorta</i> is the most serious wilding threat, some commercial species, most notably Douglas fir is rapidly assuming a similar status.</li> </ul>

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Whole Regional Policy Statement (general support)	Amend	Confirm the proposed RPS subject to adjustments outlined in submission.	No reason given.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Support	Retain Policies 2.1.1(o) and (p).	<ul style="list-style-type: none"> <li>• Flood mitigation can have a positive effect on the safety and functionality of infrastructure.</li> <li>• Support the recognition of the importance of maintaining the functionality of infrastructure.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Support	Retain Policies 2.1.2(k) and (l).	<ul style="list-style-type: none"> <li>• Flood mitigation can have a positive effect on the safety and functionality of infrastructure.</li> <li>• Support the recognition of the importance of maintaining the functionality of infrastructure.</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend Objective 2.3 to read: " <u>Natural Resources</u> systems and their interdependencies are recognised"; or alternatively: "Natural resource systems <u>and physical resources</u> , and their interdependencies are recognised."	<ul style="list-style-type: none"> <li>• Amending Objective 2.3 to encompass both natural and physical resources as proposed will make it more applicable to all the underlying policies.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Support	Retain policy as proposed.	<ul style="list-style-type: none"> <li>• Support integrated planning which ensures land use and transport decisions are made and implemented together.</li> <li>• Support Policy 2.3.1 as it recognises the management of one resource can impact on another resource.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Support	Retain policy as proposed.	Support Policy 2.3.2 as it encourages the effects of activities on all of the natural or physical resource to be considered.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	<ul style="list-style-type: none"> <li>• Support Policy 3.4.1(a) but suggest the following amendment: "Recognising functional needs of infrastructure <del>of regional or national importance</del>".</li> <li>• Retain Policy 3.4.1 (c)(i) as proposed.</li> </ul>	<ul style="list-style-type: none"> <li>• Support recognition of functional needs of infrastructure in Policy 3.4.1(a) but this policy should relate to all infrastructure.</li> <li>• The proposed RPS does not give guidance as to what types of infrastructure are nationally or regionally important.</li> <li>• Support Policy 3.4.1(c)(i) as it promotes the sustainable use of resources and may result in less demand for additional infrastructure.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	<ul style="list-style-type: none"> <li>• Delete Policy 3.4.2(b) or amend as follows: "Reduce adverse effects of those activities <u>where practicable</u>, including cumulative adverse effects on natural and physical resources".</li> <li>• Retain Policy 3.4.2(e) as proposed.</li> </ul>	<ul style="list-style-type: none"> <li>• Effects of infrastructure cannot always be avoided.</li> <li>• Concerned Policy 3.4.2(b) will result in infrastructure providers being subject to reverse sensitivity.</li> <li>• Policy 3.4.2(e) acknowledges the unique requirements of infrastructure providers</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend Objective 3.5 to read: "Infrastructure <del>of national and regional significance</del> is managed in a sustainable way."	<ul style="list-style-type: none"> <li>• The proposed RPS does not give guidance as to what types of infrastructure are nationally or regionally important.</li> <li>• By omission, suggests that locally important infrastructure does not require sustainable management.</li> </ul>
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	<ul style="list-style-type: none"> <li>• Amend to read: "Recognising <u>the</u> national <del>and regional</del> significance of infrastructure".</li> <li>• Amend (d) to read: "Roads <del>classified as being of national or regional importance</del>;"</li> </ul>	<ul style="list-style-type: none"> <li>• The proposed RPS does not give guidance as to what types of infrastructure are nationally or regionally important. Reference to specific types of infrastructure should be removed.</li> <li>• Support roads being classified as being important infrastructure.</li> <li>• Uncertain as to what roads the RPS considers to be nationally and regionally important.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend the body of the policy as follows: " <del>Minimise</del> <u>Manage</u> adverse effects from infrastructure <del>that has national or regional</del> "	<ul style="list-style-type: none"> <li>• Replace "minimise" with "manage" to accurately reflect the intent of the policy and be consistent with the purpose of the RMA.</li> <li>• "National" and "regional" should be deleted due to uncertainty about</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				significance- by:..."	their meaning.
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	Retain the policy and the subcomponents (a) to (e) but delete reference to nationally or regionally significant infrastructure.	<ul style="list-style-type: none"> <li>Support the policy as it highlights the importance of the functional requirements of infrastructure.</li> <li>"National" and "regional" should be deleted due to uncertainty about their meaning.</li> </ul>
114	Energy	Policy 3.6.6 - Reducing long term demand for fossil fuels	Support	Retain Policy as proposed.	Supports the recognition of the importance of integrated planning and the impact it can have on reducing the demand for fossil fuels.
115	Objectives on resilience, health and safety	Objective 3.7 - Urban areas are well designed, sustainable and reflect local character	Support	Retain as proposed.	<ul style="list-style-type: none"> <li>Transport networks play a key role in contributing to the quality and character of urban environments.</li> <li>Good quality urban design achieves integration between transport networks and land uses.</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Support	Retain policy as proposed.	<ul style="list-style-type: none"> <li>Particularly support d) as recognises the importance of well connected transport networks.</li> <li>Particularly support (f) &amp; (i) as the creation of these types of areas can reduce people's demand to travel.</li> </ul>
118	Urban design	Schedule 6 - Urban form and design	Amend	<ul style="list-style-type: none"> <li>Amend 1(d) as follows: "d) Creates <u>safe</u> transport networks <del>that are safer</del>".</li> <li>Retain 2(j) as proposed.</li> <li>Retain 3(a)-(k) but amend (e) as follows: "Provides for <del>public</del> transport <del>, reading, cycling and walking</del> networks that are integrated with each other and the land uses they serve".</li> </ul>	<ul style="list-style-type: none"> <li>Amendment to 1(d): Clarifies the outcomes sought and removes doubt.</li> <li>Schedule 6.2(j) promotes the integration of planning and land transport.</li> <li>Design parameters in 3) promote integrated planning, alternative transport modes and the sustainable management of infrastructure. • • Proposed amendment to 3) reflect all modes of transport.</li> </ul>
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Support	Retain policy as proposed.	Support policy as it provides for transport choices.
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Support	Retain objective as proposed.	<ul style="list-style-type: none"> <li>NZTA operate under a large planning window (up to 30 years) given overall capital investment for the maintenance and upgrade of the state highway network.</li> <li>NZTA's infrastructure planning for the future is enhanced by development occurring as anticipated by District Plans.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Support	Retain policy as proposed.	Support urban growth developing in a planned and strategic way as it provides good environmental outcomes and it helps avoid costs associated with unplanned infrastructure improvements and extension.
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Support	Retain policy as proposed.	Support the controlled release of land for urban development in a controlled manner as it promotes the efficient use of infrastructure.
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend Policy 3.8.3(c) to read as follows: "Avoid unplanned demand for provision <u>or upgrading</u> of infrastructure, <del>including domestic water supply and waste disposal</del> ."	<ul style="list-style-type: none"> <li>Not necessary to highlight specific types of infrastructure as this policy should apply to all types of infrastructure.</li> <li>The policy should accommodate the upgrading of old infrastructure as not all development of rural land will require new infrastructure.</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Support	Retain policy as proposed.	<ul style="list-style-type: none"> <li>Support as discourages the subdivision of rural land for rural residential purposes.</li> <li>Unplanned rural residential development often provides outcomes inconsistent with integrated planning.</li> </ul>
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Support	Retain policy as proposed.	Supports as policy discourages the unplanned extension of commercial activities which may adversely affect the efficient use of infrastructure.
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Support	Retain Method 3.1.4(a) as proposed.	The accumulation of vegetation within the beds of lakes, rivers and the coastal environment can alter watercourses which can adversely affect infrastructure, e.g. bridges. This method supports the sustainable management of infrastructure resources.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Support	Retain Method 4.1.12(a) as proposed.	Support as method enables the establishment of growth boundaries which promotes the efficient use of resources including infrastructure.
194	Method 4 - City and District Plans	Method 4.2 - Implementing	Support	Retain Method 4.2.4 as proposed.	Support as method promotes the use of structure plans which can

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		district plans			integrate land use and transport networks.
206	Method 7 - Strategies and Plans (non-RMA)	Method 7.3 - Regional Land Transport Plan	Amend	Retain Method 7.3 with the following amendments: <ul style="list-style-type: none"> <li>• "Regional <del>Plan</del> Land Transport <u>Plan</u> will set the objectives..." and</li> <li>• add a 5th focus statement " <u>7.3.5 Ensuring transport networks are resilient, efficient and sustainably managed</u> "</li> </ul>	<ul style="list-style-type: none"> <li>• Support method as it aligns the Regional Land Transport Plan to the RPS;</li> <li>• First amendment regards a typographical error.</li> <li>• The additional statement would encourage the sustainable management of transport networks.</li> </ul>
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Support	Retain Method 11.2.1(b)(iii) as proposed.	Support a safe network of active transport infrastructure.
239	Anticipated Environmental Results	AER 3.4 - Adverse effects on highly-valued resource values from nationally and regionally significant infrastructure are avoided or mitigated	Oppose	Delete AER 3.4.	Some infrastructure has locational requirements. It is not always possible to locate infrastructure outside of areas with outstanding and highly-valued resource values.
241	Anticipated Environmental Results	AER 3.6 - Otago's urban areas are compact and maximise the use of existing services and infrastructure	Amend	Amend 2nd indicator as follows: " <del>New u</del> Urban developments and infrastructure are <u>integrated and energy efficient -and create or integrate natural features-</u> ".	<ul style="list-style-type: none"> <li>• Indicator relevant to both new developments and the redevelopment of existing sites.</li> <li>• Proposed amendment simplifies but retains the intent of the indicator.</li> </ul>
242	Anticipated Environmental Results	AER 3.7 - Urban areas can adapt to evolving standards & changing requirements of its inhabitants and surrounding natural and physical environment	Support	Retain AER 3.7 as proposed.	<ul style="list-style-type: none"> <li>• Support improving traffic safety as an indicator of adapting to evolving standards and changing environments.</li> <li>• Support the use of NZTA's statistics and data as a reliable way to measure the indicator's performance.</li> </ul>
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>• Provide the definition of "Emergency services" and "Lifeline Utilities" as set out in the CDEM Act within the RPS.</li> <li>• Retain the definition of "infrastructure" and "reverse sensitivity" as proposed.</li> </ul>	<ul style="list-style-type: none"> <li>• Including the specific definitions of "Emergency services" and "Lifeline Utilities" will enhance the usability of the RPS.</li> <li>• Proposed definition of infrastructure encompasses infrastructure for all modes of transport.</li> <li>• Proposed definition of reverse sensitivity accurately reflects NZTA's understanding of reverse sensitivity.</li> </ul>
285	Objectives on resilience, health and safety	Introduction to Objective 3.4	Amend	Amend introduction to Objective 3.4 (p56) to read: "... Some infrastructure is provided by local authorities (such as water supply, waste water and stormwater), <u>some is provided by Requiring Authorities</u> , while others are managed by private companies.	Introduction to Objective 3.4 only mentions infrastructure provided by local authorities or private companies. There are other infrastructure providers that do not fall into either of those 2 categories, eg NZTA.
287	Objectives on resilience, health and safety	Introduction to Objective 3.6	Amend	Amend the second paragraph of introduction to Objective 3.6 to read: "... through more efficient or alternative transport fuels <u>and by encouraging integrated land development</u> ".	Introduction to Objective 3.6 should recognise that integrated land use & transport planning can reduce travel demand and thereby reduce the demand for fossil fuels.
288	Objectives on resilience, health and safety	Introduction to Objective 3.7	Support	Retain the introduction to Objective 3.7.	Support Objective 3.7 and its introduction because good quality urban design achieves integration between transport networks and land uses.

## 79 Ministry of Education

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Add policies to ensure the importance of the built environment as a physical resource is recognised.	<ul style="list-style-type: none"> <li>• Worthwhile objective but the supporting policies have a narrow focus on natural resources and does not recognise the built environment.</li> <li>• The assets of the Ministry are a physical resource with a very important value in terms of the function they perform for the community.</li> </ul>
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Support	Supported.	The policy enables the construction of hard mitigation measures if necessary to protect educational facilities.
96	Objectives on resilience, health	Objective 3.4 - Good quality	Amend	Amend as follows: "Good quality infrastructure	• Supports as seeks to ensure the infrastructure and services the

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	and safety	infrastructure and services meet community needs		and <u>essential</u> services meet community needs."	community need are provided. <ul style="list-style-type: none"> <li>The meaning of "services" is unclear: should be reworded to reflect the use of the term essential services elsewhere in the RPS.</li> </ul>
97	Infrastructure - general	Policy suite 3.4 - Good quality infrastructure and services meet community needs	Amend	Widen the focus of policies from "infrastructure" to include "services".	<ul style="list-style-type: none"> <li>Would reflect the intent of Objective 3.4.</li> <li>Proposed policies have a strong focus on infrastructure despite the inclusion of "services" in the objective.</li> </ul>
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend Policy 3.4.1 as follows: "Policy 3.4.1 Integrating infrastructure <u>and essential services</u> with land use Achieve the strategic integration of infrastructure <u>and essential services</u> with land use, by: a) Recognising functional needs of infrastructure of regional or nation importance <u>and essential services</u> ; and b) Designing infrastructure <u>and essential services</u> to take into account: ... vi. Co-dependence with other infrastructure <u>and essential services</u> ; and vii. The effects of climate change on the long term viability of that infrastructure <u>or essential services</u> ; and c) Managing urban growth:...	Amendments would better recognise the need to provide for essential services in order to achieve Objective 3.4.
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend a) as follows: "Maintain their ability to function <del>to the fullest extent possible</del> <u>as far as reasonably practicable</u> , during and after natural hazard events; and"	<ul style="list-style-type: none"> <li>Supports the policy as it promotes the resilience of essential services to natural hazard events.</li> <li>"To the fullest extent possible" is an extremely open ended statement: the Ministry may have a different view on what "fullest extent possible" is compared with a territorial authority.</li> <li>The Ministry has its own set of requirements to be met when designing a new building (for example).</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Support	Supports Policy 3.7.1(d)	Ministry conscious of ensuring there is good access and connectivity within and between communities to facilitate the movement of students to and from educational facilities, and that public spaces are designed to meet the mobility needs of the community.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Support	Supports Policy 3.7.4.	Ministry conscious of ensuring there is good access and connectivity within and between communities to facilitate the movement of students to and from educational facilities, and that public spaces are designed to meet the mobility needs of the community.
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Amend (b)(i) as follows: "Provide infrastructure <u>and essential services</u> in and efficient and effective way; and"	<ul style="list-style-type: none"> <li>Supports intent of policy.</li> <li>Focus of (b) to be widened to include "essential services", including educational facilities, as the latter are as important as infrastructure in supporting the needs of the community.</li> <li>Essential services should be considered when managing urban growth, esp. when new urban areas are created, e.g. the new school established at Shotover Country.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Amend	Amend b) as follows: " <del>Releasing land in a way that ensures a logical spatial development, and efficient use of existing land, infrastructure, before new land is released; and</del> <u>Before releasing new land for development consider whether: (i) the release ensures a logical spatial development and efficient use of existing land; and (ii) The release ensures the efficient use of infrastructure; and (iii) additional essential services will be required to service the released</u>	<ul style="list-style-type: none"> <li>Question the justification of the reference to urban growth boundaries in the Policy, as, given no boundaries are detailed in Schedule 8, the Policy has no effect.</li> <li>Focus should be widened to include "essential services" as, when new urban areas are created, the community may expect a new school to be constructed, which may not be viable. The educational needs of the community should not be overlooked when urban expansion is considered.</li> <li>Supports urban growth boundaries or the identification of urban development areas as would assist the long term planning of the</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				land; and "	Ministry.
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Amend	Amend (b)(ii) as follows: " <del>Schools and other educational facilities activities; or</del> "	<ul style="list-style-type: none"> <li>• Support policy as seeks to avoid discharges next to sensitive activities.</li> <li>• Amendment for brevity and consistency.</li> <li>• Notes that school sites discharge to the environment as part of their operations. Although avoid making objectionable discharges, different communities have different tolerances to certain discharges.</li> <li>• In some instances, considerable investment has been made in such infrastructure; this should be had regard to when making decisions on discharge permit applications.</li> </ul>
249	Glossaries	Glossary	Amend	Amend the definition of "essential services" as follows: "Include hospitals and health services, <del>schools- educational facilities</del> , public transport and essential commercial activities for civil defence purposes.	<ul style="list-style-type: none"> <li>• Supports recognition of schools as an essential service.</li> <li>• Schools are only part of the educational facilities in Otago. They also include tertiary education and childcare centres.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	Such further or consequential relief as may be necessary to fully give effect to the relief sought in this submission.	That the proposed provisions be retained, deleted or amended as set out in the submission points so as to provide for the sustainable management of the Otago Region's natural and physical resources and thereby achieve the purpose of the RMA.

### 80 PauaMAC 5 Incorporated and The Otago Rock Lobster Industry Association Incorporated

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend (h) to read: "protect important recreation <u>and commercial</u> values."	<ul style="list-style-type: none"> <li>• The paua and rock lobster industries are entirely reliant on clean coastal waters and healthy coastal ecosystems. Appropriate to acknowledge it in policy.</li> <li>• Proposed amendment consistent with Policies 2.1.6, which recognises indigenous species important for commercial purposes, &amp; 2.2.14, which recognises the degree of soil versatility for primary production as a value of the soil resource.</li> <li>• Risk that, as proposed, policy results in planning decisions allocating coastal resources between recreational and commercial users of fisheries, which would be contrary to RMA30(2).</li> </ul>
43	Highly valued natural resources - indigenous biodiversity	Schedule 5 - Criteria for the assessment of significant indigenous vegetation and habitat of indigenous fauna	Amend	Amend the introductory sentences of Schedule 5 to provide that criterion 1, "representativeness", does not apply to the assessment of significance in relation to the CMA.	<ul style="list-style-type: none"> <li>• Schedule 5 provides an area "will be considered significant" if it meets at least one criteria.</li> <li>• Otago's marine environment is largely unmodified, making nearly every area "representative" of an indigenous vegetation type or habitat: nearly every part of the CMA must be considered "significant", and therefore subject to Policy 2.2.2.</li> <li>• As a result, the importance of protecting the values of truly significant areas will be undermined, and unnecessary costs will be placed on the sustainable utilisation of resources in the CMA.</li> <li>• The Government's Marine Protected Area Policy incorporates the concept of representativeness, but it provides a process under which particular representative areas are selected for protection.</li> <li>• Under proposed amendment, the other criteria would still apply to the CMA, and areas which are rare or under threat or distinctive would still be picked up: it would not therefore preclude the meaningful identification of significant areas within the CMA.</li> </ul>
62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Amend	Amend (c)(iii) and (iv) to read: "iii) Maintain or enhance the values of beds of rivers and lakes, wetlands and their margins; <del>and</del> iv) <u>Maintain and enhance coastal values; and</u> "...	<ul style="list-style-type: none"> <li>• Strongly endorse focus on integrated management and the need to recognise and manage the impact of terrestrial activities on coastal water quality and habitats.</li> <li>• Policy 2.3.3 fails to recognise that activities in freshwater catchments can also have impacts on coastal waters and ecosystems.</li> <li>• Proposed amendment makes the relationship between activities in freshwater catchments and impacts on the coastal environment more</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
63	Natural systems and interdependencies	Policy 2.3.4 - Applying an integrated management approach for the coastal environment	Amend	Amend to read: "Apply an integrated management approach to activities <del>in</del> <u>that affect</u> the coastal environment..."	<p>explicit.</p> <ul style="list-style-type: none"> <li>• Strongly endorse focus on integrated management and the need to recognise and manage the impact of terrestrial activities on coastal water quality and habitats.</li> <li>• The policy focuses on activities in the coastal environment, even though activities landward of the coastal environment can have an impact on resources and values within the coastal environment.</li> <li>• Proposed policy internally inconsistent, with the chapeau applying to activities in the coastal environment, but b) referring to the coordinated management of land use, freshwater and coastal water.</li> <li>• Proposed amendment consistent with Policy 2.3.5's wording.</li> </ul>
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend (b) to read: "Designing infrastructure to take into account: (i) Actual and reasonably foreseeable land use change; (ii) <u>Actual and reasonably foreseeable changes in the use of other resources, including in the coastal marine area;</u> (iii)..."	<ul style="list-style-type: none"> <li>• The seafood industry requires effective infrastructure to ensure products can be landed, processed and transported efficiently with minimal environmental impact.</li> <li>• Marine-based resource use may in the future require new or improved infrastructure in Otago.</li> <li>• Focus on "land use" unnecessarily restrictive. Would prefer a more explicit recognition of the need for strategic integration of infrastructure with the use of marine resources.</li> </ul>
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for economic production	Amend	Amend to read: "Sufficient land <u>and other resources</u> is managed and protected for economic production".	<ul style="list-style-type: none"> <li>• Strongly support the intent of the Objective.</li> <li>• But it is unduly narrow; and it appears (from the use of the term "land use" in the explanation on p.82) to aim specifically at the use of terrestrial land rather than at the broader issue of ensuring that sufficient resources are managed and protected for economic production.</li> <li>• The "non-land" resources that the Objective should cover include coastal space and coastal ecosystem services that support economic production.</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend (a) to read: "Enabling farming, <u>fishing</u> , and other rural activities that support the rural economy;"	<ul style="list-style-type: none"> <li>• Paua and rock lobster fisheries support the wellbeing of rural coastal communities throughout the Otago region.</li> <li>• Support the intent of Policy 4.3.1, but it unduly focuses on the terrestrial rural environment.</li> </ul>
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Add the following item to (a): " <u>vi) Areas of significance for existing activities that have a functional need to locate in that area:</u> "	<ul style="list-style-type: none"> <li>• Support proposition that mineral exploration, extraction and processing activities need to be located where mineral resources exist.</li> <li>• Other locationally constrained activities include the paua and rock lobster fisheries.</li> <li>• Recommended amendment recognises mining activities should, if possible, not be located in areas utilised by other existing activities which cannot re-locate due to spatial distribution of natural or physical resources.</li> <li>• Recognising the requirements of existing activities to be located in particular areas encourages the efficient use and development of natural and physical resources (RMA S7(b))</li> </ul>
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Amend	Amend (a)(iii) and (b)(iv) to read: "In close proximity to mahika kai sites or <u>seafood harvesting areas</u> :"	<ul style="list-style-type: none"> <li>• Mahika kai are not the only food harvesting areas that are sensitive to objectionable or offensive discharges.</li> <li>• Seafood harvesting areas also require protection from those discharges for reasons including public health, seafood quality control, consumer perception of seafood health and quality and access to export markets.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Provide for an additional criterion as follows: " <u>The implementation of the offset does not result in any adverse effects on existing uses and values</u> ".	<ul style="list-style-type: none"> <li>• Support the concept of appropriate use of biodiversity offsets.</li> <li>• The Policy does not acknowledge the potential adverse effects of biodiversity offsets on existing users of the CMA, which could result in transferring the costs of development's adverse effects from the developer to existing users.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> <li>For example, offset in the form of a marine protected area or restrictions on coastal access may cause a displacement of commercial paua and rock lobster harvesting activity. This can affect the ability of fishers to provide for their well-being and may have an adverse effect on the sustainability of fisheries.</li> </ul>
177	Roles and responsibilities	Roles and responsibilities	Support	Support	<ul style="list-style-type: none"> <li>The allocation of roles and responsibilities for the use, storage, disposal or transportation of hazardous substances is appropriate.</li> </ul>
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Add following criterion to Method 4.1.7: " <u>The coastal marine area</u> ".	<ul style="list-style-type: none"> <li>The allocation of roles and responsibilities for the use, storage, disposal or transportation of hazardous substances is appropriate (p.82).</li> <li>The use, storage, disposal or transportation of hazardous substances within the jurisdiction of city and district councils (i.e. on dry land) can have adverse effects in areas outside of the jurisdiction of city or district councils, including the CMA.</li> </ul>

### 81 Darby Planning LP

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Change the provisions to recognise the benefits of tourism, employment, recreation activities, subdivision and the value of rural land with value beyond primary production.	<ul style="list-style-type: none"> <li>It is unclear how the Proposed RPS addresses section 6(a), (b), (c) and 7(c) RMA matters. In particular the hierarchy or pre-eminence of the various policies is unclear.</li> <li>In the Supreme Court's decision on King Salmon, the Court states that apparent conflicts between policies need to be resolved, with those expressed in directive terms carrying greater weight than those expressed in less directive terms.</li> <li>The Court also found that what adverse effects are to be avoided and what activities are appropriate, need to be assessed by reference to what is to be protected.</li> </ul>
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Oppose	<ul style="list-style-type: none"> <li>Delete policies 2.1.1 and 2.1.2 and add a new policy as follows: <ul style="list-style-type: none"> <li><u>"Recognise the values of freshwater, and the beds of rivers, lakes, wetlands, and their margins, and manage them to:</u></li> <li><u>a) Protect outstanding water bodies and wetlands; and</u></li> <li><u>b) Maintain or enhance the natural functioning of rivers, lakes, and wetlands, their riparian margins, and aquifers; and</u></li> <li><u>c) Maintain ecosystem health and indigenous biodiversity; and</u></li> <li><u>d) Retain the range and extent of habitats provided by freshwater; and</u></li> <li><u>e) Maintain migratory patterns of freshwater species, unless detrimental to indigenous biodiversity; and</u></li> <li><u>f) Maintain or enhance natural character; and</u></li> <li><u>g) Avoid aquifer compaction, and seawater intrusion in aquifers; and</u></li> <li><u>h) Maintain or enhance coastal values supported by freshwater values; and</u></li> <li><u>i) Maintain good water quality or enhance it where it has been degraded; and</u></li> <li><u>j) Retain the quality and reliability of existing drinking water supplies; and</u></li> <li><u>k) Maintain Kai Tahu values; and</u></li> <li><u>l) Provide for other cultural values; and</u></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>There is considerable duplication of the values and attributes to be managed under the two policies, and the policies could be readily consolidated into one policy.</li> <li>The protection requirements set too high a test, particularly in relation to protection of migratory patterns of freshwater species, important recreational values, Kai Tahu values, natural functioning of the beds of river and fail to recognise that these may be affected by existing activities. These should be amended to require "maintenance" of these values.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>m) Maintain recreation values; and</p> <p>n) Maintain the landscape and amenity values of rivers, lakes, and wetlands; and</p> <p>o) Avoid the adverse effects of pest species, prevent their introduction and reduce their spread; and</p> <p>p) Mitigate the adverse effects of natural hazards, including flooding and erosion; and</p> <p>q) Maintain bank stability; and</p> <p>r) Maintain the ability of existing infrastructure to operate within their design parameters."</p>	
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	<p>Amend e) and g) as follows:</p> <ul style="list-style-type: none"> <li>• "e) <del>Protect</del> <u>Maintain</u> natural resources and processes that support indigenous biodiversity; and"</li> <li>• "g) <del>Protect</del> <u>Maintain</u> biodiversity significant to Kai Tahu; and"</li> </ul>	<ul style="list-style-type: none"> <li>• The "protection" requirement in these clauses is too high a test and fails to recognise that the effects of existing activities.</li> <li>• Protection of indigenous biodiversity is subject to section 6(c) of the RMA which requires only the protection of areas of "significant" indigenous vegetation, and "significant" habitats of indigenous fauna.</li> </ul>
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	<p>Amend policy 2.1.7 as follows:</p> <p>"Recognise the values of natural features, landscapes, <u>and</u> seascapes <del>and the coastal environment</del> are derived from the following attributes, as detailed in Schedule 4:</p> <p>a) Biophysical attributes, including:</p> <p>i. Natural science factors, <u>including biotic and abiotic factors</u> ;</p> <p>ii. <del>The presence of water</del> <u>Legibility and expressiveness</u> ;</p> <p>iii. <del>Vegetation (indigenous and introduced)</del> ;</p> <p>iv. <del>The natural darkness of the night sky</del> ;</p> <p>b) Sensory attributes, including:</p> <p>i. <u>Legibility or expressiveness</u></p> <p>..."</p>	<ul style="list-style-type: none"> <li>• Support relevant city or district council taking responsibility for identification of landscapes.</li> <li>• Landscape policies within the PRPS need to be consistent with modified pigeon bay criteria so that those policies are relevant and can be implemented by local authorities. The list of attributes within the policy (and Schedule 4) are not consistent with contemporary landscape planning practice as established in case law, and require amendment.</li> <li>• The reference in the policy to "the coastal environment" is redundant given explicit recognition of "seascapes" in the policy.</li> <li>• The values of the "coastal environment" are not limited to landscape matters and include a wider range of values which are otherwise managed under the proposed policy.</li> </ul>
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete Schedule 4 criteria for the identification of natural features and landscapes.	Schedule 4 replicates the matters listed within Policy 2.1.7 with some very minor changes.
43	Highly valued natural resources - indigenous biodiversity	Schedule 5 - Criteria for the assessment of significant indigenous vegetation and habitat of indigenous fauna	Amend	Amend Schedule 5 criteria, to make them more definitive, and in line with those used for the Canterbury Region.	<ul style="list-style-type: none"> <li>• The criteria in Schedule 5 are similar to other recent RPS.</li> <li>• The thresholds to satisfy a criteria are lower than in some previous plans; and the requirement to satisfy just one criteria to trigger significance means many sites would likely be identified as significant.</li> <li>• Particular issues identified with the criteria include: <ul style="list-style-type: none"> <li>• Criteria 1 (Representative) is very broad, and more definitive criteria is required as to what triggers representativeness.</li> <li>• Criteria 2 (Rarity): Including at risk and uncommon species without any qualification on the importance of the area, may trigger many sites as significant without meeting any other criteria.</li> <li>• Criteria 5 (Ecological Context) needs more guidance on how it is to be applied.</li> </ul> </li> <li>• More guidance is also required to assist in interpretation and ensure consistent application to determine what meets the significance threshold. Such guidance has been for example produced for the Canterbury Region.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	<p>Amend Policy 2.2.2 as follows:</p> <p>"Protect and enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by:</p> <p>a) <u>Assessing the significance of adverse</u></p>	<ul style="list-style-type: none"> <li>• Clauses (d) and (e) undermine the protection intent of clause (a) and (b) and would not appropriately achieve section 6(c) of the RMA.</li> <li>• Interpretation of the policy would be aided by re-ordering it such clause (c) which provides the basis for assessing the scale of effects is moved to being clause (a).</li> </ul>

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				<p><del>effects in accordance with the criteria in Schedule 3; and</del></p> <p>b) <del>Avoiding significant adverse effects, and remedying, and mitigating all other, adverse effects on those values which contribute to the area or habitat being significant; and</del></p> <p><del>c) Avoiding significant adverse effects on other values of the area or habitat; and</del></p> <p>d) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del></p> <p>e) <del>Remediating, when adverse effects cannot be avoided; and</del></p> <p>f) <del>Mitigating where adverse effects cannot be avoided or remediated; and</del></p> <p><del>g) c) Encouraging enhancement of those areas and values."</del></p>	
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend Policy 2.2.3, as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes, using the attributes as detailed <u>within Policy 2.1.7</u> in Schedule 4."	<ul style="list-style-type: none"> <li>Support the identification of outstanding natural features and landscapes using the attributes detailed within Policy 2.1.7 as modified by submission.</li> <li>The attributes detailed in Policy 2.1.7 are similar to Schedule 4.</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	<p>Amend Policy 2.2.4 as follows:</p> <p>"Protect, enhance and restore the values of outstanding natural features, landscapes and seascapes, by:</p> <p><u>a) Assessing the significance of adverse effects in accordance with the criteria in Schedule 3; and</u></p> <p>b) Avoiding adverse effects on those values which contribute to the significance of the natural feature, landscape or seascape within the coastal environment; <u>and or</u></p> <p>c) Avoiding, remedying or mitigating <del>other</del> adverse effects on <del>other</del> those values <u>which contribute to the significance of the natural feature or landscape outside of the coastal environment</u>; and</p> <p>d) <del>Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> ..."</p>	<ul style="list-style-type: none"> <li>Section 6(b) and policy 15 of the NZCPS only requires protection from "inappropriate subdivision, use, and development", and therefore policy 2.2.4 sets too high a test.</li> <li>Interpretation of the policy would be aided by re-ordering clause (c) to clause (a).</li> <li>Need for different management approaches for landscapes in the coastal environment, and inland landscapes, because of the NZCPS requirements. Outside of the coastal environment, it is considered more appropriate to avoid, remedy or mitigate adverse effects.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	<p>Amend Policy 2.2.6 as follows:</p> <p><del>Protect</del> <u>Maintain</u> or enhance the values of special amenity landscapes and highly valued natural features, by:</p> <p><u>a) Assessing the significance of adverse effects in accordance with the criteria in Schedule 3; and</u></p> <p>b) <u>Within the coastal environment</u>, avoiding significant adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and</p> <p>c) <u>Within the coastal environment and inland environments</u>, avoiding, remedying or mitigating <del>other</del> adverse effects on <del>other</del> those values which contribute to the special amenity of the</p>	<ul style="list-style-type: none"> <li>The "protection" focus of policy 2.2.6 sets too high a test as Section 7(c) however only requires "maintenance and enhancement" of amenity values.</li> <li>Interpretation of the policy would be aided by re-ordering clause (c) to clause (a).</li> </ul>

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				landscape or natural feature; and d) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and ..."	
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend Policy 2.2.13 as follows: "Protect the <u>significant</u> values of outstanding water bodies and wetlands by: a) <u>Assessing the significance of adverse effects on values in accordance with the criteria in Schedule 3; and</u> b) Avoiding significant adverse effects, including cumulative effects, on those <u>significant</u> values which contribute to the water body or wetland being outstanding; and c) Avoiding, remedying or mitigating other adverse effects on the water body or wetland's values; and d) <u>Assessing the significance of adverse effects on values, as detailed in Schedule 3; and ..."</u>	<ul style="list-style-type: none"> <li>Objectives A2 and B4 of the NPS on Freshwater Management only seek to ensure that the "significant" values of outstanding waterbodies, and wetlands are protected, consequently the test set by Policy 2.2.13 is inappropriately high.</li> <li>Interpretation of the policy would be aided by re-ordering clause (c) to clause (a).</li> </ul>
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Oppose	Delete Policy 3.2.6.	<ul style="list-style-type: none"> <li>The policies relevant to natural hazards adopt a risk-based approach to hazard management.</li> <li>Policy 3.2.6 is contrary to the general approach taken through the other provisions because it seeks to avoid increasing natural hazard risk, regardless of its consequences or measures that can be used to mitigate that risk.</li> </ul>
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend Policy 3.4.1 as follows: "Achieve the strategic integration of infrastructure with land use, by: a) Recognising functional needs of infrastructure of regional or national importance; and b) <u>Locating and</u> designing infrastructure to take into account: ... d) Co-ordinating the design and development of infrastructure with the staging of land use change, including with: i. Structural design <del>and release of land for</del> <u>within</u> new urban development; or ..."	<ul style="list-style-type: none"> <li>A minor change to clause (b) is sought clarifying that the requirements are also relevant in considering the "location" of infrastructure.</li> <li>Clause c) and d) are supported, provided the measures in d) are related to the design and delivery of infrastructure and do not act to stage release of land. The wording of clause d) could be improved to make this clear.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend Policy 3.4.2 b) as follows: "b) <u>Reduce</u> <del>Minimise</del> adverse effects of those activities <u>as far as practicable</u> , including cumulative adverse effects on natural and physical resources; and ..."	Technical and operational constraints can influence the degree to which adverse effects from infrastructure can be reduced.
114	Energy	Policy 3.6.6 - Reducing long term demand for fossil fuels	Support	Retain policy 3.6.6.	Support the reduction in demand for fossil fuels through policies that encourage compact urban development and well integrated urban areas, including the provision of connections within and between urban areas.
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Amend	Amend Objective 3.8, as follows: "Urban growth is well designed and integrates effectively <del>with</del> <u>adjoining urban and rural</u> the environments".	Objective 3.8 is narrowly worded to focus on urban and rural environments and in doing so could miss other aspects of the natural or physical environment such as roading corridors, recreation areas, areas of significant indigenous vegetation that do not fit well with an urban or rural descriptor.
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Amend Policy 3.8.1, as follows: "Manage urban growth and creation of new	<ul style="list-style-type: none"> <li>Support the co-ordination of urban growth with infrastructure but it is unclear what is meant by unplanned infrastructure expansion,</li> </ul>

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				<p>urban land in a strategic and co-ordinated way, by:</p> <p>...</p> <p>b) <u>Avoid communities bearing the costs of extension to and maintenance of infrastructure expansion related to urban growth. Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to:</u></p> <p>i. <u>Provide infrastructure in an efficient and effective way; and</u></p> <p>ii. <u>Avoid additional costs that arise from unplanned infrastructure expansion; and</u></p> <p>c) <u>Identifying future growth areas that:</u></p> <p>i. <u>Minimise adverse effects on rural productivity, including loss of highly valued soils or creating competing urban demand for water and other resources; and</u></p> <p>ii. <u>Maintain or enhance significant biodiversity, landscape or natural character values; and</u></p> <p>iii. <u>Maintain important cultural or heritage values; and</u></p> <p>iv. <u>Avoid land with significant risk from natural hazards; and</u></p> <p>..."</p>	<p>particular given the direction to avoid. Re-word the policy to avoid communities bearing the costs of extensions to and maintenance of infrastructure expansion related to urban growth.</p> <ul style="list-style-type: none"> <li>• Oppose the strong emphasis on rural productivity, based on loss of highly valued soils, in clause c); rural areas are becoming increasingly diverse in their value through viticulture, tourism and recreation activities.</li> <li>• It is also unclear how future growth areas are being incorporated into the plan, given that none are included within the document as notified. Any introduction at the request of territorial authorities outside the RMA Schedule 1 process would be ultra vires.</li> <li>• The policies relating to future growth areas are appropriately addressed within the broader urban growth policies.</li> <li>• The identification of areas for future growth are not a regional issue and is best implemented through District Plans.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	Delete Policy 3.8.2.	<ul style="list-style-type: none"> <li>• The policy is unclear on the purpose of staging development within urban boundaries. It conflicts with Policy 3.8.1 seeking to provide for at least 10 years of land supply for residential, commercial and industrial activities.</li> <li>• Policy 3.8.1 appropriately deals with the significant resource management issues relating to urban growth.</li> <li>• There is a significant problem with the implementation of Policy 3.8.2 as the Schedule 8 as notified does not include urban growth boundaries. Any introduction at the request of territorial authorities outside the RMA Schedule 1 process would be ultra vires.</li> <li>• The identification of areas for future growth are not a regional issue and is best implemented through District Plans.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete Schedule 8.	<ul style="list-style-type: none"> <li>• The identification urban growth boundaries is not a matter of regional significance that needs to be controlled through the PORPS, but should be left to the District Councils to manage through the District Plan.</li> <li>• Concern regarding the process to incorporate urban boundaries into the RPS, as these have not been included within the notified review.</li> <li>• The policies relating to management of urban growth, including the co-ordination of infrastructure, appropriately deal with the issues relating to urban growth.</li> <li>• The proposed controls over where and how growth is managed within growth boundaries does not achieve any relevant resource management purpose, including relating to the management of any adverse effects on the environment.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend Policy 3.8.3, as follows: <u>"To enable Manage subdivision, use and development of rural land, where the adverse effects are avoided, remedied or mitigated, having regard to:</u>	<ul style="list-style-type: none"> <li>• The matters listed within clauses a) to d) should be matters to have regard to when managing the subdivision, use and development of rural land.</li> <li>• The policies relating to the fragmentation of rural land are disproportionately weighted towards the protection of rural land</li> </ul>

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				<p>a) <del>Avoid development of</del> The fragmentation of land which undermines or forecloses the potential of rural land: ...</p> <p>b) <del>Have particular regard to</del> whether the proposal will result in a loss of the productive potential of highly versatile soil, unless: ...</p> <p>c) <del>Avoid unplanned demand for</del> The provision of infrastructure, including domestic water supply and waste disposal; and</p> <p>d) <del>Avoid creating</del> competing demand for water or other resources;"</p>	<p>based. This is an outdated and narrow understanding of the value of rural land that is not supported by the provisions of the RMA.</p> <ul style="list-style-type: none"> <li>• Rural areas are becoming increasingly diverse in their value as a resource for not only farming, but also viticulture, tourism and recreation activities</li> <li>• The management of subdivision and residential activities which DPL submits can positively impact on the amenity values of rural areas through an increase in natural conservation values, a reduction in plant or other pests and result in the protection of landscape values and areas of indigenous flora and fauna.</li> <li>• The creation of comparatively smaller lots within the rural areas is an efficient use of the land resource that can minimise effects on landscape and amenity values while also maintaining the value of rural land for other purposes.</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	<p>Amend Policy 4.3.1, as follows: "Manage activities in rural areas, to support the region's economy and communities, by: ... d) Minimising the subdivision of productive rural land into smaller lots that may result in rural residential activities; and e) <u>Enabling tourism, employment, recreational and other activities, Providing for other activities that have a functional need to locate in rural areas, including tourism and recreational activities that and</u> are of a nature and scale compatible with rural activities."</p>	<ul style="list-style-type: none"> <li>• The management of rural activities to provide for a wider base for the support of a diverse range of activities that sustain the regional economy is supported.</li> <li>• DPL seeks amendments to clause e) to enable activities such as tourism, employment and recreation development within rural areas as a significant contributor to the regional economy where it is compatible with rural activities.</li> <li>• The policies relating to the fragmentation of rural land are disproportionately weighted towards the protection of rural land based. This is an outdated and narrow understanding of the value of rural land that is not supported by the provisions of the RMA</li> <li>• Rural areas are becoming increasingly diverse in their value as a resource for not only farming, but also viticulture, tourism and recreation activities</li> <li>• The management of subdivision and residential activities which DPL submits can positively impact on the amenity values of rural areas through an increase in natural conservation values, a reduction in plant or other pests and result in the protection of landscape values and areas of indigenous flora and fauna.</li> <li>• The creation of comparatively smaller lots within the rural areas is an efficient use of the land resource that can minimise effects on landscape and amenity values while also maintaining the value of rural land for other purposes.</li> </ul>
165	Making the most of available resources	Policy 4.4.3 - Encouraging environmental enhancement	Support	Retain Policy 4.4.3	Support the intent of Policy 4.4.3 which encourages activities that contribute to or enhance the natural environment.
172	Management of adverse effects	Policy 4.5.5 - Controlling the introduction and spread of pest plants and animals	Support	Retain Policy 4.5.5.	Support the intent of Policy 4.5.5 relating to the control of pest species.
251	Other comments	Implementation	Amend	Produce best practice guidance which provides clear and certain guidance to support the consistent interpretation and application of the Schedule 5 criteria.	More guidance is required to assist in interpretation and ensure consistent application to determine what meets the significance threshold. Such guidance has been for example produced for the Canterbury Region.
258	Other comments	Consequential amendments & other amendments providing relief	Amend	<p>Request for:</p> <ul style="list-style-type: none"> <li>• Any relief similar [to decisions requested in submission] which achieves the same effect; and</li> <li>• Any consequential amendments required to give effect to this relief.</li> </ul>	No reason given.

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30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Oppose	<p>Delete policies 2.1.1 and 2.1.2 and add the following new policy:</p> <p><u>"Recognise the values of freshwater, and the beds of rivers, lakes, wetlands, and their margins, and manage them to:</u></p> <p><u>a) Protect outstanding water bodies and wetlands; and</u></p> <p><u>b) Maintain or enhance the natural functioning of rivers, lakes, and wetlands, their riparian margins, and aquifers; and</u></p> <p><u>c) Maintain ecosystem health and indigenous biodiversity; and</u></p> <p><u>d) Retain the range and extent of habitats provided by freshwater; and</u></p> <p><u>e) Maintain migratory patterns of freshwater species, unless detrimental to indigenous biodiversity; and</u></p> <p><u>f) Maintain or enhance natural character; and</u></p> <p><u>g) Avoid aquifer compaction, and seawater intrusion in aquifers; and</u></p> <p><u>h) Maintain or enhance coastal values supported by freshwater values; and</u></p> <p><u>i) Maintain good water quality or enhance it where it has been degraded; and</u></p> <p><u>j) Retain the quality and reliability of existing drinking water supplies; and</u></p> <p><u>k) Maintain Kai Tahu values; and</u></p> <p><u>l) Provide for other cultural values; and</u></p> <p><u>m) Maintain important recreation values; and</u></p> <p><u>n) Maintain the landscape and amenity values of rivers, lakes, and wetlands; and</u></p> <p><u>o) Avoid the adverse effects of pest species, prevent their introduction and reduce their spread; and</u></p> <p><u>p) Mitigate the adverse effects of natural hazards, including flooding and erosion; and</u></p> <p><u>q) Maintain bank stability; and</u></p> <p><u>r) Maintain the ability of existing infrastructure to operate within their design parameter "</u></p> <p>Make any consequential amendments necessary to give effect to the relief sought.</p>	<ul style="list-style-type: none"> <li>• Policies 2.1.1 and 2.1.2 require "protection" of certain values and attributes, including: the migratory patterns of freshwater species, important recreational values, Kai Tahu values, and the natural functioning of the beds of rivers.</li> <li>• The "protection" requirement in these clauses is too high a test and does not give effect to the NPS on Freshwater Management.</li> <li>• This level of "protection" fails to recognise that migratory patterns, natural functioning, recreational, and Kai Tahu values are affected by the effects of existing activities, including nationally and regionally significant infrastructure within freshwater bodies. This requirement could unduly affect the continued operation of the upstream Waitaki Hydro-Electric Power Scheme.</li> <li>• There is also considerable duplication of the values and attributes to be managed under the two policies, and the policies could be readily consolidated into one policy addressing the values associated with both water and the beds of waterbodies.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	<p>Amend (e) and (g) as follows:</p> <p><del>"e) Protect</del> <u>Maintain</u> natural resources and processes that support indigenous biodiversity; and (...)</p> <p><del>g) Protect</del> <u>Maintain</u> biodiversity significant to Kai Tahu; and etc."</p>	<ul style="list-style-type: none"> <li>• Clauses (e) and (g) require "protection" of natural resources and processes that support indigenous biodiversity and of biodiversity significant to Kai Tahu: this "protection" is too high a test and is unnecessary to meet section 6(c) of the RMA with regard to indigenous biodiversity.</li> <li>• This level of "protection" fails to recognise that protection of natural resource and processes that support indigenous biodiversity, and biodiversity significant to Kai Tahu can be affected by the effects of existing activities, including nationally and regionally significant infrastructure. This could unduly affect the continued operation of the upstream Waitaki Hydro-Electric Power Scheme.</li> </ul>
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascaapes	Amend	<ul style="list-style-type: none"> <li>• Amend as follows: "Recognise the values of natural features, landscapes, <del>and seascaapes</del> and the coastal environment- are derived from</li> </ul>	<ul style="list-style-type: none"> <li>• The reference in the policy to "the coastal environment" is redundant given explicit recognition of "seascaapes".</li> <li>• The values of the coastal environment are not limited to landscape</li> </ul>

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				<p>the following attributes, as detailed in Schedule 4:</p> <p>a) Biophysical attributes, including:</p> <p>i. Natural science factors <u>including biotic and abiotic factors</u> ;</p> <p>ii. <del>The presence of water</del> <u>Legibility and expressiveness</u> ;</p> <p>iii. <del>Vegetation (indigenous and introduced);</del></p> <p>iv. <del>The natural darkness of the night sky</del></p> <p>b) Sensory attributes, including:</p> <p>i. <del>Legibility or expressiveness</del></p> <p>Etc.</p> <ul style="list-style-type: none"> <li>Make any other consequential amendments necessary to give effect to the relief sought.</li> </ul>	<p>matters and include a wider range of values which are otherwise managed under the proposed policy.</p> <ul style="list-style-type: none"> <li>The list of attributes are not consistent with case law and best practice landscape planning: "the presence of water" and "vegetation" are captured under "natural science factors" and do not need to be separately listed.</li> </ul>
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Amend	Amend Schedule 4 to reflect amendments sought to Policy 2.1.7.	The list of attributes are not consistent with case law and best practice landscape planning: "the presence of water" and "vegetation" are captured under "natural science factors" and do not need to be separately listed.
43	Highly valued natural resources - indigenous biodiversity	Schedule 5 - Criteria for the assessment of significant indigenous vegetation and habitat of indigenous fauna	Amend	Amend the criteria in Schedule 5 to make them more definitive, and in line with those used for the Canterbury Region.	<ul style="list-style-type: none"> <li>The criteria in Schedule 5 are similar to other recent proposed RPS including the Canterbury RPS.</li> <li>The thresholds to satisfy a criteria are lower than in other plans and the requirement to satisfy just one criteria to trigger significance means many sites would likely be identified as significant. This would not appropriately achieve section 6(c) of the RMA.</li> <li>Particular issues include: <ul style="list-style-type: none"> <li>Criteria 1 Representative - is very broad, and more definitive criteria is required as to what triggers representativeness.</li> <li>Criteria 2 Rarity Including at risk and uncommon species without any qualification on the importance of the area, may trigger many sites as significant.</li> <li>Criteria 5 – Ecological Context. This criteria needs more guidance on how it is to be applied.</li> </ul> </li> <li>More guidance is required to assist in interpretation and ensure consistent application to determine what meets the significance threshold.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	<p>Amend Policy 2.2.2 as follow "Protect and enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by:</p> <p><u>a) Assessing the significance of adverse effects in accordance with the criteria in Schedule 3; and</u></p> <p><del>a) b) Avoiding adverse effects on those values which contribute to the area or habitat being significant; and</del></p> <p><del>b) Avoiding significant adverse effects on other values of the area or habitat; and</del></p> <p><del>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del></p> <p><del>d) Remediating, when adverse effects cannot be avoided; and</del></p> <p><del>e) Mitigating where adverse effects cannot</del></p>	<ul style="list-style-type: none"> <li>Clause (d) and (e) undermine the protection intent of (a) and (b) and would not appropriately achieve RMA S6(c).</li> <li>The requirement to protect "other values" (clause (b)) is unnecessary and redundant: the significant qualities of areas are only contingent on the values that contribute to that significance.</li> <li>Policy 2.2.2 should recognise offsetting and compensation, as those are provided for by the NPS on Renewable Electricity Generation, case law and current biodiversity best practice, and recognised in Policies 3.5.2 and 4.5.8.</li> <li>Clause (c) should come first to aid interpretation of the policy.</li> </ul>

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				<p><del>be avoided or remediated; and</del>  <del>c) Offsetting or compensating residual effects on indigenous biodiversity, which cannot otherwise be avoided, remedied, or mitigated.</del>  <del>f) d) Encouraging enhancement of those areas and values.</del></p>	
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	<p>Amend Policy 2.2.4 as follows: "Protect <u>from inappropriate subdivision, use, and development, and encourage enhancement and restoration</u> of the values of outstanding natural features, landscapes and seascapes, by:</p> <p><u>a) Assessing the significance of adverse effects in accordance with the criteria in Schedule 3; and</u>  <del>a) b) Avoiding adverse effects on those values which contribute to the significance of the natural feature, landscape or seascape; and</del>  <del>b) Avoiding, remedying or mitigating other adverse effects on other values; and</del>  <del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del>  <del>d) c) Recognising and providing for positive contributions of existing introduced species to those values; and</del>  <del>e) d) Controlling the adverse effects of pest species, preventing their introduction and reducing their spread; and</del>  <del>f) e) Encouraging enhancement of those areas and values.</del></p>	<ul style="list-style-type: none"> <li>• Policy 2.2.4 sets too high a test, as RMA S6(b) and policy 15 of the NZCPS only requires "protection" from "inappropriate subdivision, use and development".</li> <li>• The requirement to protect "other values" (clause (b)) is unnecessary and redundant: the significant qualities of areas are only contingent on the values that contribute to that significance.</li> <li>• Clause (c) should come first to aid interpretation of the policy.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	<p>Amend Policy 2.2.6 as follow "<u>Protect Maintain</u>, or enhance the values of special amenity landscapes and highly valued natural features, by:</p> <p><u>a) Assessing the significance of adverse effects in accordance with the criteria in Schedule 3; and</u>  <del>a) b) Within the coastal environment, Avoiding significant adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and</del>  <del>b) c) Other than where (b) applies, A avoiding, remedying or mitigating other adverse effects on other those values which contribute to the special amenity of the landscape or natural feature ; and</del>  <del>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del>  <del>d) Recognising and providing for positive contributions of existing introduced species to those values; and</del>  <del>e) Controlling the adverse effects of pest species, preventing their introduction and</del></p>	<ul style="list-style-type: none"> <li>• Policy 2.2.6 sets too high a test, as RMA S7(c) only requires "maintenance and enhancement of amenity values".</li> <li>• Policy 15 of the NZCPS focusing on the coastal environment only, there is no higher order policy direction that requires avoidance of effects on "other" landscapes when they are inland and avoidance is unnecessary to achieve RMA S7(c).</li> <li>• Clause (c) should come first to aid interpretation of the policy.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				reducing their spread; and f) Encouraging enhancement of those values.	
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	<ul style="list-style-type: none"> <li>Amend Policy 2.2.9 as follows: "Preserve or enhance the natural character values of the coastal environment, by:               <ul style="list-style-type: none"> <li>a) <del>Assessing the significance of adverse effects in accordance with the criteria in Schedule 3; and</del></li> <li><del>a)- b)</del> Avoiding adverse effects on those values which contribute to the outstanding natural character of an area; and</li> <li><del>c)</del> <del>Avoiding significant adverse effects on those values which contribute to the high natural character values of an area; and</del></li> <li>d) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del></li> <li><del>e)- c)</del> Avoiding <u>significant adverse effects, and avoiding</u> remedying or mitigating other adverse effects on other <u>natural character</u> values; and etc."</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Policy 13 of the NZCPS requires that significant adverse effects on natural character generally be avoided without making a distinction between areas of high and lesser natural character.</li> <li>Clause (b) seeks significant adverse effects on areas of "high natural character values" be avoided: it therefore presents too low a test and does not give effect to the NZCPS.</li> <li>Clause (d) should come first to aid interpretation of the policy.</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	<ul style="list-style-type: none"> <li>Amend Policy 2.2.13 as follows "Protect the <u>significant</u> values of outstanding water bodies and wetlands by:               <ul style="list-style-type: none"> <li>a) <del>Assessing the significance of adverse effects on values in accordance with the criteria in Schedule 3; and</del></li> <li><del>a)- b)</del> Avoiding significant adverse effects, including cumulative effects, on those <u>significant</u> values which contribute to the water body or wetland being outstanding; and</li> <li><del>b)- c)</del> Avoiding, remedying or mitigating other adverse effects on the water body or wetland's values; and</li> <li><del>c)</del> <del>Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> ..."</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Objectives A2 and B4 of the NPS however only seek to ensure that the "significant" values of outstanding waterbodies, and wetlands are protected.</li> <li>Policy 2.2.13 requires "protection" of all values, and therefore presents too high a test and does not appropriately give effect to the NPS on Freshwater Management.</li> <li>Clause (c) should come first to aid interpretation of the policy.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Amend	<ul style="list-style-type: none"> <li>Amend (a) as follows: "a) Ensuring that resource objective <u>and management approaches are consistent and</u> <del>are</del> complementary across administrative boundaries; and"</li> </ul>	<ul style="list-style-type: none"> <li>Support clause (a) and its requirement that resource objectives be complementary across administrative boundaries, as, for the Lower Waitaki River, management of river values needs to be consistent between the Canterbury and Otago region's to achieve integrated management.</li> <li>Management approaches also need to be consistent where regions are jointly responsible for a common resource, to ensure conflicting approaches are avoided, and avoid creating uncertainty for resource users.</li> <li>Meridian needs certainty of a consistent approach to the management of the Lower Waitaki River between regions to ensure the continued operation, maintenance, and upgrading of the Waitaki Hydro-Electric Power Scheme.</li> </ul>
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	<ul style="list-style-type: none"> <li>Amend 3.4.1 as follows: "b) <u>Locating and designing infrastructure to take into account:</u></li> </ul>	Minor change sought to clarify that the requirements are also relevant in considering the "location" of infrastructure.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				etc." • Make any consequential amendments necessary to give effect to the relief sought.	
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	• Amend (b) as follows: " <del>Reduce</del> <u>Minimise</u> adverse effects of those activities <u>as far as practicable</u> , including cumulative adverse effects on natural and physical resources; and"	<ul style="list-style-type: none"> <li>• Technical and operational constraints can influence the degree to which adverse effects from infrastructure can be reduced, as recognised in Policy C1 of the NPS for Renewable Electricity Generation. Such practical constraints are applicable to all infrastructure.</li> <li>• The location of existing infrastructure, logistical and technical practicalities, and the location of supporting natural resources can all influence the degree to which effects can be avoided, remedied, and mitigated. For example, renewable electricity generation needs to be located in areas where the renewable energy resource is available. Similarly the location of transmission infrastructure is dependent on being able to efficiently connect generation resources with areas of electricity demand.</li> <li>• Clause (b) should therefore be amended to require adverse effects of infrastructure activities should be minimised "as far as practicable".</li> </ul>
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	• Amend as follows: " <u>Locate and</u> design lifeline utilities, and facilities for essential or emergency services, to:".	Minor change sought to clarify that the requirements are also relevant in considering the "location" of infrastructure.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	<ul style="list-style-type: none"> <li>• Amend Policy 3.4.4 as follow "Protect the functioning of hazard mitigation measures, lifeline utilities, and essential or emergency services, including by: <ul style="list-style-type: none"> <li>a) [unchanged]</li> <li><u>b) Assessing the significance of adverse effects on those measures, utilities or services in accordance with the criteria in Schedule 3; and</u></li> <li><del>b) c)</del> Avoiding significant adverse effects on those measures, utilities or services; and</li> <li><del>c) d)</del> Avoiding, remedying or mitigating other adverse effects on those measures, utilities or services; and</li> <li><del>d)</del> <u>Assessing the significance of adverse effects on those measures, utilities or services, as detailed in Schedule 3; and</u></li> </ul> </li> </ul>	Clause (d) should be re-ordered to aid interpretation of the policy.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend (a) as follows: "a) Renewable electricity generation facilities, where they supply the national electricity grid and local distribution network <u>, including the Waitaki Hydro Electric Power Scheme</u> ; and".	<ul style="list-style-type: none"> <li>• The national significance of renewable electricity generation facilities is supported.</li> <li>• Explicit recognition should be included for the Waitaki Hydro-Electric Power Scheme: it is the largest hydro-electric power scheme in New Zealand, contributing on average some 18% of New Zealand's annual electricity supply, although at times this can be as high as 30% of the national requirement.</li> <li>• The scheme is critical to New Zealand's social, economic, and cultural wellbeing, and its recognition is critical to give effect to the NPS on Renewable Electricity Generation.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend as follows: "Minimise adverse effects from infrastructure that has national or regional significance, by: <ul style="list-style-type: none"> <li>a) [unchanged]</li> <li><u>b) Assessing the significance of adverse effects on those values in accordance with the criteria in Schedule 3; and</u></li> </ul>	<ul style="list-style-type: none"> <li>• Support clause (b) in principle but should refer to the practical constraints which generally result in the inability to avoid locating infrastructure in sensitive areas. The location of existing infrastructure, logistical and technical practicalities, and the location of supporting natural resources can all influence the degree to which effects can be avoided, remedied, and mitigated.</li> <li>• Recognition of offsetting and compensation is appropriate, but the</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><del>-b)- c)</del> Where it is not possible to avoid there is a functional necessity for locating in the areas listed in a) above, avoiding significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and</p> <p><del>-e)- d)</del> Avoiding, remedying or mitigating other adverse effects on values; and</p> <p><del>-d)</del> Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</p> <p>e) <del>Considering the use of Offsetting, or other compensatory measures, compensating for residual adverse effects on indigenous biodiversity, which cannot be otherwise avoided, remedied, or mitigated.</del></p>	<p>wording of clause (f) needs more accurately reflect the terms upon which such offsetting is enabled under policies 4.5.7 and 4.5.8.</p> <ul style="list-style-type: none"> <li>• Clause (d) should be re-ordered to aid interpretation of the policy.</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<ul style="list-style-type: none"> <li>• Amend as follows: "Protect infrastructure of national or regional significance, by: <ul style="list-style-type: none"> <li>a) [unchanged]</li> <li><u>b) Assessing the significance of adverse effects on those needs in accordance with the criteria in Schedule 3; and</u></li> <li><del>-b)- c)</del> Avoiding significant adverse effects on the <del>functional needs</del> <u>operation</u> of such infrastructure; and</li> <li><del>-e)- d)</del> Avoiding, remedying or mitigating other adverse effects on <del>the functional needs</del> <u>operation</u> of such infrastructure <u>in a way that does not foreclose the ability of such infrastructure to continue functioning</u>; and</li> <li><del>-d)</del> Assessing the significance of adverse effects on those needs, as detailed in Schedule 3; and</li> <li>e) [unchanged]</li> <li><u>g) Maintaining access to such infrastructure for maintenance and operational purposes.</u></li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Minor changes recommended to increase clarity.</li> <li>• Need for specific reference to the need to maintain access to infrastructure for maintenance and operational purposes, as loss of access to such infrastructure as a consequence of the establishment of new activities can compromise the operational integrity of infrastructure.</li> <li>• Clause (d) should be re-ordered to aid interpretation of the policy.</li> </ul>
109	Energy	Policy 3.6.1 - Using existing renewable electricity generation structures and facilities	Amend	<p>Amend as follows: "<del>Give preference to</del> <u>Enable</u> the use of existing structures or facilities to increase the region's renewable electricity generation capacity <del>over developing new structures in new locations</del>".</p>	<ul style="list-style-type: none"> <li>• The policy is inappropriate and does not give effect to the NPS.</li> <li>• The policy should instead be amended to enabling the use of existing renewable electricity generation facilities generally, to give effect to the NPS.</li> </ul>
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	<p>Amend as follows: "Protect the generation capacity of nationally or regionally significant renewable electricity generation activities, by: [...]</p> <p><u>c) Assessing the significance of adverse effects on the functional needs of that infrastructure in accordance with the criteria in Schedule 3; and.</u></p> <p><del>-e)- d)</del> [unchanged]</p> <p><del>-d)</del> Assessing the significance of adverse effects on those needs, as detailed in Schedule 3.</p>	<p>Clause (d) should be re-ordered to aid interpretation of the policy.</p>
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	<p>Amend (b) as follows: "b) Requiring the development or upgrade of infrastructure that increases use efficiency <u>where it is currently</u></p>	<p>While seeking the increased efficiency of the allocation and use of water is appropriate, it is impracticable to require such increases in efficiency where it is already efficient or it is technically impracticable</p>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				inefficient, and technically practicable; and	to achieve greater efficiency.
167	Management of adverse effects	Policy suite 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Amend	Add a new Policy 4.5.9 as follow " <u>Recognise and enable environmental compensation as a voluntary means to provide measurable positive environmental outcomes to counter adverse environmental effects on indigenous biodiversity values which cannot otherwise be avoided, remedied, mitigated, or offset.</u> "	<ul style="list-style-type: none"> <li>The NPS on Renewable Electricity Generation, case law, and current biodiversity best practice has established that environmental compensation can also be used under the RMA to provide positive environmental enhancement as a means to counter any adverse environmental effects that cannot be avoided, remedied, mitigated, or offset.</li> <li>The Proposed RPS should include a policy to recognise and enable the legitimate practice of environmental compensation.</li> </ul>
239	Anticipated Environmental Results	AER 3.4 - Adverse effects on highly-valued resource values from nationally and regionally significant infrastructure are avoided or mitigated	Amend	Amend as follows: Adverse effects on Otago's outstanding and highly-valued natural and physical resource values from nationally and significant infrastructure are avoided, <del>remedied, or mitigated, offset, or compensated.</del> Indicators: There is no <del>net loss to</del> <u>significant adverse effects on</u> the values of Otago's outstanding, significant, or high valued natural and physical resources resulting from nationally and regionally significant infrastructure, <del>and residual adverse effects on indigenous biodiversity are offset or compensated.</del> How Indicators can be measured: State of the environment monitoring, evaluation reports	The AER does not appropriately reflect what is sought by the Plan objectives and policies, in particular Policy 3.5.2.
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>Add the following definitions to the Glossary: "<u>Offsetting - measureable outcomes resulting from actions designed to counter residual adverse effects of subdivision, use and development on indigenous biodiversity, which cannot otherwise be avoided, remedied, or mitigated.</u>" "<u>Environmental Compensation - measureable outcomes resulting from voluntary actions designed to provide new positive effects to counter residual adverse effects of subdivision, use and development on indigenous biodiversity, which cannot be otherwise avoided, remedied, mitigated, or offset.</u>"</li> </ul>	Offsetting and compensation are recognised in the policies as a means to address residual environmental adverse effects on indigenous biodiversity. Definition of these terms is required to make it clear as to the scope of offsetting and compensation, and ensure they are applied appropriately.
251	Other comments	Implementation	Amend	Produce best practice guidance which provides clear and certain guidance to support the consistent interpretation and application of Schedule 5 criteria.	More guidance is required to assist in interpretation and ensure consistent application to determine what meets the significance threshold.
258	Other comments	Consequential amendments & other amendments providing relief	Amend	Make any other consequential amendments necessary to give effect to the relief sought.	No reason given

### 83 NZ Pork Industry Board

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Include a policy of protecting productive soils from fragmentation or inappropriate use by activities that do not have a functional need to be located in the rural environment.	Urban spread and development of lifestyle subdivisions can undermine rural productivity and should be discouraged where they will impact on sustainable growth of rural activities.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Amend 2.2.15 d) by adding a qualifier that the appropriateness is dependent on the	Although urban expansion may be appropriate in areas with highly valued soil resources due to location, a qualifier is required to ensure

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				requirement for primary production to be assessed first.	that the need for these for use in primary production activities is assessed first.
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Add "... and avoids reverse sensitivity effects." to Policy 3.8.1 c) i.	Reverse sensitivity is a significant adverse effect on rural production activities that is exacerbated by urban growth into rural areas. Urban growth needs to be managed to avoid this effect.
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Support	Retain Policy 3.8.2 c).	Support avoiding urban growth in inappropriate areas.
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Support	Retain Policy.	Support the avoidance of fragmentation of rural land, especially with regards to reverse sensitivity effects.
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Support	Retain the policy.	Reverse sensitivity, fragmentation, and rural subdivision must be avoided in primary production areas. Rural activities have a functional need to be in rural locations – there is no alternative.
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Add to point a): " <u>avoiding there location in rural areas where there may be adverse effects on primary production activities.</u> "	Mineral and gas exploration in rural areas can result in adverse effects including stock disturbance and loss of production land.
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Amend	Add to point c): " <u>in inappropriate locations</u> ".	<ul style="list-style-type: none"> <li>• In rural environments some odour is to be expected that may be considered objectionable in other environments (for example, animal effluent).</li> <li>• It is important that the emphasis is on managing the effects of these discharges rather than seeking to avoid them completely.</li> </ul>
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Add to Policy 4.5.6 a): " <u>avoiding there location in rural areas where there may be adverse effects on primary production activities.</u> "	Mineral and gas exploration in rural areas can result in adverse effects including stock disturbance and loss of production land.

#### 84 Rayonier Matariki Forests Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Whole Regional Policy Statement (general support)	Support	Retain the objectives, policies and methods as notified, subject to specific amendments sought in submission.	Generally support the objectives, policies and methods within the PRPS, with the exception of specific amendments.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Support	Retain as notified.	<ul style="list-style-type: none"> <li>• Support the need to recognise &amp; manage soil values, particularly retaining soil resources for primary production.</li> <li>• "Primary production" should be defined and include plantation forestry.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Support	Retain as notified.	a) and b) are particularly important for plantation forestry, when considering the positive environmental effects that accrue from the plantation forestry cycle (e.g. reducing erosion and improving water quality).
62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Support	Retain as notified.	b) is particularly important in terms of recognising the positive effects (including in relation to water quality and aquatic biodiversity) arising from plantation forestry for the most of the forestry cycle.
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<ul style="list-style-type: none"> <li>• Amend Policy's first sentence as follows: "<del>Managing fragmentation, subdivision, use and development</del> of rural land".</li> <li>• Amend (b)(iii) as follows: "<del>iii.</del> <u>c) Avoid reverse sensitivity effects on rural productive activities can be avoided; and...</u>"</li> </ul>	<ul style="list-style-type: none"> <li>• Generally support Policy, and particularly reference to avoiding reverse sensitivity effects on rural productive activities.</li> <li>• However, as drafted, reverse sensitivity effects would only be managed in terms of rural land fragmentation. The policy should address those reverse sensitivity effects more generally.</li> <li>• Rural land fragmentation is already addressed in a).</li> </ul>
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for economic production	Support	Retain as notified.	<ul style="list-style-type: none"> <li>• Objective acknowledges the use of land for productive activity underpins the economy of the region and this is strongly supported by Rayonier.</li> <li>• It is essential that the PRPS acknowledges that primary productions</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					activities are important to the region in terms of both social and economic wellbeing and that these activities may result in both positive and negative effects.
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	<ul style="list-style-type: none"> <li>Amend a) as follows: "Enabling farming and other <del>rural</del> <u>primary production</u> activities that support the rural economy; and"</li> <li>Amend e) as follows: "Providing for other activities that have a functional need to locate in rural areas, including tourism and recreational activities that are of a nature and scale compatible with <u>primary production</u> <del>rural</del> activities."</li> </ul>	Rayonier supports the intent of Policy 4.3.1 and particularly c) which addresses reverse sensitivity effects. For consistency, useful to refer to "primary production" rather than "rural activities" in a) and e), as primary production is used in b) and throughout the PRPS.
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Amend	Amend Policy 4.3.2a) so that it does not single out forestry as follows: "a) Restricting <del>any extension of forestry</del> activities within those catchments that would result in a significant reduction in water yield, ..."	<ul style="list-style-type: none"> <li>Oppose Policy as seeks to restrict any extension of forestry activities within catchments that would result in a significant reduction in water yield as it fails to take into account the significant environmental and economic benefits that are provided by plantation forestry and places undue weight on the importance of water quantity.</li> <li>The proposed regulation will deliver negligible improvements in water yield and ignores environmental benefits of plantation forestry.</li> <li>Favour an integrated catchment approach to ensure water quantity issues are not isolated from the broader issues that make up sustainable land management.</li> </ul>
162	Making the most of available resources	Policy suite 4.4 - Otago's communities can make the most of the natural and built resources available for use	Amend	Include new policy on the need to use resources efficiently to enable economic activity and social wellbeing and which will achieve Objective 4.4.	<ul style="list-style-type: none"> <li>Rayonier supports efficient resource use and the need for resources to be used for economic activity and well-being.</li> <li>The policies associated to Objective 4.4 do not appear to be about efficient resource use generally (other than specifically water use or waste minimisation) or the need to use resources to enable economic activity and wellbeing.</li> </ul>
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>Define what is meant by "dry catchment".</li> <li>Add a definition of "primary production", e.g. "<u>Activities that involve the production of primary products such as those from farming, poultry farming, horticultural, or plantation forestry activities, and which have a functional need for a rural location</u>".</li> </ul>	<ul style="list-style-type: none"> <li>The term "dry catchment", used in Policy 4.3.2, would need a definition to clarify where the policy will apply.</li> <li>The term "primary production" is used throughout the PRPS, and should be defined to clarify what activities fall into that category.</li> </ul>

### 85 Trustpower Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	<p>Amend as follows: "Ensure that local authorities exercise their functions and powers, to:</p> <p>a) <del>Accord Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,</del></p> <p>...</p> <p>d) <del>Ensure Kai Tahu have the prerogative to:</del>  <u>Recognise and provide for Kai Tahu to identify their relationship with their ancestral lands, water, sites, wahi tapu and other taoka by:</u></p> <p>i. <del>Identify their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka;</del>  <u>and</u></p> <p>ii. <del>Determine how best to express that relationship; and</del></p> <p>e) <del>Ensure Kai Tahu are able to. Have regard</del></p>	<ul style="list-style-type: none"> <li>Maintaining good working relationship with Kai Tahu when dealing with resource management issues is already a requirement inherent within the RMA6(e), 7(a) and 9.</li> <li>Clause (a) does not appear to have an identified resource management purpose and should be deleted. It is inconsistent with the notification determination which focuses on the extent of effects, not the status of a party.</li> <li>Clauses (d) and (e) require further amendment to better align with sections 6 and 7 of the RMA.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				to the exercise of kaitiakitaka; and ..."	
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Kai Tahu values, <del>rights and interests and customary resources are sustained-</del> <u>recognised and provided for.</u> "	<ul style="list-style-type: none"> <li>• A requirement to "recognise and provide for" Kai Tahu values will provide a broader framework for the management of these values.</li> <li>• Reference to "rights" should be deleted as the subsequent policies do not provide any further context around what specific "rights" are being referred to.</li> </ul>
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Support	Maintain objective as notified.	Concerned about how this objective will be applied in practice. For this objective to be useful it needs to be supported by additional policies that recognise, maintain and enhance physical resources.
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Include additional policies that recognise, maintain and enhance physical resources	Current policies are insufficient to achieve Objective 2.1 as they only address natural values and not physical values.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend as follows: "Recognise freshwater values, and manage freshwater, to: ... c) Protect <u>the values of</u> outstanding water bodies and wetlands; and ... j) <del>Protect-</del> <u>provide for</u> Kai Tahu values; and k) <del>Provide for other cultural values; and-</del> ... p) Maintain the ability of <del>existing-</del> infrastructure to operate within their design parameters <u>and provide for appropriate upgrade and expansion of infrastructure.</u> <u>Maintain the ability of water users to provide for the economic, health and safety and social wellbeing of the community.</u> "	<ul style="list-style-type: none"> <li>• Amend so that it suitably recognises and provides for the development and growth of infrastructure that relies on fresh water resources.</li> <li>• The policy also needs to recognise the use of freshwater in providing for the social and economic wellbeing of the community.</li> <li>• Enabling industry that relies on freshwater resources to only operate within the bounds of existing parameters discourages growth.</li> <li>• Better guidance is required as to how policies will be implemented and what outcome is intended.</li> <li>• Unclear what is intended by protecting Kai Tahu values and providing for other cultural values.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: a) <del>Protect or restore their natural-</del> <u>Maintain functioning in order to provide for key values;</u> and b) Protect <u>the values of</u> outstanding water bodies and wetlands; and ... e) <del>Retain the range and extent of habitats supported; and</del> f) Maintain or enhance natural character; and g) <del>Protect-</del> <u>Provide for</u> Kai Tahu values; and h) <del>Provide for other cultural values; and</del> ... k) Mitigate the adverse effects of natural hazards, including flooding and erosion; <del>and</del> l) Maintain bank stability <u>and</u> m) <u>Maintain the ability to use the beds of lakes and rivers for infrastructure and to those providing for the economic, health and safety and social wellbeing of the community.</u> "	<ul style="list-style-type: none"> <li>• This policy does not suitably recognise that the use of the region's beds of rivers, lakes and wetlands can also be essential for the social and economic wellbeing of the region.</li> <li>• Elements of this policy (clause (a)) will restrict the use of existing activities within freshwater resources. A hydro generation system alters the natural functioning of a river system so in order to give effect to this policy the removal of such facilities would be required. This is not considered to be appropriate.</li> <li>• Additional minor amendments are also required to ensure this policy is consistent with PowerNet submission on Policy 2.1.1.</li> </ul>
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend the policy as follows: "Recognise soil values, and manage soils, to: ... g) <del>Protect-</del> <u>Provide for</u> Kai Tahu values; and ... h) <del>Provide for other cultural values; and-</del> ... m) Maintain the ability to use soils for	<ul style="list-style-type: none"> <li>• It is not clear why Kai Tahu values are to be elevated above all other resource management issues relating to the management of soil, in that they are required to be protected.</li> <li>• This policy does not suitably recognise that the use of soil resources can also be essential to the economic and social wellbeing of the region.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<u>infrastructure and by those providing for the economic, health and safety and social wellbeing of the community.</u> "	
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>• This policy applies to all ecosystems, indigenous and otherwise, and has no regard to the significance of these ecosystems.</li> <li>• As other policies provide for areas of significance this policy is not needed.</li> </ul>
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Support	Retain policy as notified (or similar wording to achieve desired relief).	<ul style="list-style-type: none"> <li>• Support criteria in that they are consistent with case law and the National Coastal Policy Statement (NZCPS).</li> <li>• Better guidance is needed from the regional authority to ensure local authorities apply the criteria consistently.</li> <li>• Within the Otago context, landscape values differ remarkably: a landscape which is deemed to be of outstanding value in the Dunedin City context might not be awarded such a status elsewhere in Otago e.g. Queenstown Lakes.</li> <li>• This has presented difficulties and inconsistencies in the current district planning framework: the Lammerlaw Ranges which is host to Trustpower's Mahinerangi wind farm, are deemed to be outstanding in DCC District Plan but not in the CODC District Plan. With respect to Trustpower's wind farm application the Court determined that the site is not outstanding, despite having this overlay applied in DCC District Plan.</li> <li>• This is not effective and efficient and as such PowerNet is of the view that District Council's should be guided by an assessment identifying outstanding landscapes and features at the regional level.</li> </ul>
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Amend	Amend as follows: "Otago's significant and highly-valued natural resources are identified, and protected <del>or enhanced</del> <u>from inappropriate use or development</u> ."	This objective is too restrictive and generic in that it seeks to "protect" all of Otago's significant and highly valued natural resources.
42	Highly valued natural resources - indigenous biodiversity	Policy 2.2.1 - Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: "Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna <u>at a regional level</u> ."	PowerNet consider it appropriate that those areas within the region that are significant are identified at the regional level.
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend the policy as follows: "Protect and <u>where appropriate</u> enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding <u>where practicable</u> adverse effects on those values which contribute to the area or habitat being significant; and ... d) <u>Remedying or mitigating</u> where adverse effects cannot be avoided <del>or remediated</del> ; and ..."	<ul style="list-style-type: none"> <li>• It is appropriate that this policy acknowledges that the "protection" of significant indigenous vegetation and habitats of significant fauna can also be achieved via appropriate mitigation and/or offset strategies.</li> <li>• Proposed amendments would provide better certainty as to how the policy is to be applied.</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	<ul style="list-style-type: none"> <li>• Amend the policy as follows: "Policy 2.2.3 Identifying outstanding natural features, landscapes and seascapes <u>at the regional level</u>."</li> <li>• Consider remove this policy or Policy 2.1.7.</li> <li>• Clarify wording</li> </ul>	<ul style="list-style-type: none"> <li>• Support criteria in that they are consistent with case law and the National Coastal Policy Statement (NZCPS)</li> <li>• Better guidance is needed from the regional authority to ensure local authorities apply the criteria consistently.</li> <li>• District Councils should be guided by an assessment identifying outstanding landscapes and features at the regional level.</li> <li>• Within the Otago context, landscape values differ remarkably: a landscape which is deemed to be of outstanding value in the Dunedin City context might not be awarded such a status elsewhere in Otago e.g. Queenstown Lakes..</li> <li>• Policy 2.2.3 reads essentially as a repeat of Policy 2.1.7.</li> <li>• Unclear whether the policy will only apply to "outstanding natural</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					landscapes" and "outstanding natural seascapes"
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Oppose	Delete this policy or amend clause a) as follows: "a) Avoiding <u>significant</u> adverse effects on those values which contribute to the significance of the natural feature, landscape or seascape; and"	<ul style="list-style-type: none"> <li>This policy seeks to combine a number of different resource management issues (section 6(a), 6(b) RMA, and policies 13 and 15 of the NZCPS) and directives, and the result is somewhat confused.</li> <li>Clause a) goes further than part 2 of the Act. It leaves no room to provide for important physical resources such as infrastructure or other activities common in areas of outstanding value.</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Policy 2.2.5 Identifying special amenity landscapes and highly valued natural features <u>at a regional level.</u> "	<ul style="list-style-type: none"> <li>It is appropriate to identify landscapes that have high amenity values.</li> <li>Following a regional wide landscape study, local authorities should be responsible for identifying such areas within their respective Districts.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Oppose	Delete this policy or rewrite to focus more on the maintenance of amenity landscapes.	<ul style="list-style-type: none"> <li>This policy seeks to protect landscapes and features that are not deemed to be "outstanding" in accordance with RMA S6(b).</li> <li>It is appropriate to manage the adverse effects on amenity values, but the focus of this policy should not be to "protect" such landscapes.</li> <li>Avoiding significant adverse effects establishes an inappropriately high threshold test.</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>It is appropriate to identify areas of high valued soil resource.</li> <li>This policy appears to be an unnecessary duplication of the matters contained within Policy 2.1.5.</li> </ul>
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>RMA requirement that the life supporting capacity of the soil resource is sustained, is not the same as requiring its protection and the avoidance of adverse effects.</li> <li>It is not appropriate to apply the management regime established by the NZCPS on outstanding natural character and outstanding natural landscapes within the coastal environment to all resource aspects throughout the Region.</li> <li>The policy repeats Policy 2.1.5, which is better worded as it refers to the maintenance of soil values.</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend this objective so it seeks to achieve the integrated management of the natural and physical resources of the region, including consideration of economic benefits.	<ul style="list-style-type: none"> <li>The policies for this objective all relate to integrated management.</li> <li>The human use and economic benefits from development of natural and physical resources also need to be considered.</li> <li>The current drafting of the objective fails to achieve this as it only refers to natural resource systems.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>The intended purpose or outcome of this policy is not clear.</li> <li>It is inappropriate to try to manage resources in an integrated manner when only focusing on one resource.</li> <li>Given the more specific policies that follow relating to the direction of integrated management on certain resource values Alliance submits that this policy should be deleted.</li> </ul>
62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Amend	Amend to recognise that in achieving integrated management the human use and economic values of the resource should also be taken into account.	<ul style="list-style-type: none"> <li>This directive is probably derived from the NPS for Freshwater.</li> <li>The Proposed RPS provides no further guidance as to how 'freshwater objectives' are to be developed, what matters should be considered and how they should be applied at the regional level.</li> <li>More detailed and transparent guidance on these freshwater objectives is required if the obligations inherent within the NPS for Freshwater are to be achieved.</li> <li>The human use (i.e. economic and community) values of resources should be clearly recognised and provided for in the integrated management of natural and physical resources</li> </ul>
65	Chapter B3 - Resilience, health and safety	Chapter B3 - general requests	Amend	<ul style="list-style-type: none"> <li>Insert an additional objective which seeks to " Enable the ongoing operation, use, maintenance and development of renewable</li> </ul>	<ul style="list-style-type: none"> <li>While a specific objective and policies which relates to energy is supported, Objective 3.6 does not go far enough in giving effect to the National Policy Statement for Renewable Electricity Generation 2011</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				energy generation facilities within the Otago Region. " <ul style="list-style-type: none"> <li>• Include new objectives and policies that recognise the benefits of and the need to enable the development of new renewable electricity generation activities.</li> </ul>	(NPS REG): it should specifically enable the ongoing operation, use and maintenance as well as the development of renewable energy facilities within the region. <ul style="list-style-type: none"> <li>• Objective 3.6 is inappropriately focussed on the energy needs of Otago and fails to recognise that electricity generation is nationally significant.</li> <li>• Chapter 3.6 should also explicitly recognise the benefits that are to be derived from the development and ongoing use of renewable energy generation activities.</li> </ul>
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Oppose	Delete Objective 3.1, or modify it to better reflect the objective's intention.	<ul style="list-style-type: none"> <li>• This objective is too vague to be effective and meaningful in its implementation.</li> <li>• It is not clear what is meant by "environmental constraint".</li> </ul>
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Oppose	Delete Policy 3.1.1.	<ul style="list-style-type: none"> <li>• Reference to "environmental constraint" is ambiguous and should be removed.</li> <li>• It is not at all clear how this policy will be implemented in practice and what this would mean for developments and activities throughout the region.</li> <li>• The weighing of individual policies that provide for development and those that seek protection will ensure that environmental constraints are considered.</li> </ul>
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate to seek to minimise the risk from natural hazards to communities.
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Support	Retain the policy as notified (or similar wording to achieve relief).	It is appropriate to identify natural hazards present within the Otago region.
82	Natural hazard risk	Policy 3.2.2 - Assessing natural hazard likelihood	Support	Retain the policy as notified (or similar wording to achieve relief).	<ul style="list-style-type: none"> <li>• It is appropriate to assess the likelihood of natural hazard events occurring.</li> <li>• The method places the onus on the ORC and territorial authorities to undertake this work: it would be inappropriate for every resource user to have to complete an individual natural hazard assessment.</li> </ul>
83	Natural hazard risk	Policy 3.2.3 - Assessing natural hazard consequence	Amend	Amend policy to make it clear that the natural hazard assessment will be undertaken at a strategic level.	This assessment should be part of a higher level strategic assessment by the regional council.
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	<ul style="list-style-type: none"> <li>• Insert a new clause at d): "<u>d) The extent to which the activity is functionally required to locate within a natural hazard risk area; and ...</u>"</li> <li>• Consequential renumbering of the subsequent clauses.</li> </ul>	It is necessary to recognise that certain activities, for example hydrogeneration, are necessarily located within areas which would be classified as potentially high natural hazard risk (i.e. river environment, flood events).
96	Objectives on resilience, health and safety	Objective 3.4 - Good quality infrastructure and services meet community needs	Amend	Amend the objective as follows: "Good quality infrastructure and services meets community needs <u>on a local, regional and national scale.</u> "	It is necessary to recognise specifically that certain infrastructure might be required in order to support the wider needs of New Zealand, rather than the needs of Otago as a region or local area only.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Insert new clause e) as follows: " <u>e) Ensuring that land use and development does not result in adverse effects on the operation, use and development of infrastructure.</u> "	<ul style="list-style-type: none"> <li>• For certain infrastructure (i.e. local roads) integration with land use patterns and development is essential.</li> <li>• Certain infrastructure, such as regionally or nationally significant infrastructure, does not require to be so closely integrated with urban areas and development</li> <li>• In some cases the nature of the infrastructure influences the quality and use of the environment surrounding it.</li> <li>• This policy should also seek to ensure that land use development does not result in adverse effects (i.e. reverse sensitivity effects) on certain infrastructure assets.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	<ul style="list-style-type: none"> <li>• Provide for the development of infrastructure where it appropriately manages adverse effects on the environment, and where the</li> </ul>	<ul style="list-style-type: none"> <li>• Seeking to manage infrastructure activities is not appropriate as this is ultimately driven by commercial, economic, and other imperatives that are not relevant in the context of the RMA.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				development will give rise to benefits on a local, regional or national basis. • Amend policy to refer to the "management of effects arising from the development and use of infrastructure activities".	• As drafted this policy provides little guidance in terms of how projects relating to infrastructure will be assessed and considered under the RPS.
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend this policy to provide for the development and ongoing use and maintenance of lifeline utilities within the region.	• Given the status of such facilities as lifeline utilities and the standards required under other legislation (i.e. the Building Act), this policy does not need to ensure they will be developed to withstand natural hazard events. • This policy should seek to recognise the essential nature and benefits that are to be derived from the development and ongoing protection of such "lifeline utilities" within the region.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Support	Retain policy as notified (or similar wording to achieve desired relief).	• This policy is considered appropriate, subject to the amendments to the definition of lifeline utility.
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend the objective as follows: " <del>Infrastructure of national and regional significance is managed in a sustainable way- The development, use, operation and maintenance of infrastructure of national and regional significance is recognised and provided for.</del> "	• This objective is generally supported. • It is not appropriate for the RPS to determine how infrastructure is to be managed as there are commercial, economic and other imperatives that drive the management of such facilities. • It is appropriate for the RPS to enable the development, use, operation and maintenance of infrastructure of national or regional significance.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate that regionally significant infrastructure including renewable energy generation facilities are identified as of national and regional significance.
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend the policy as follows: " <del>Minimise Manage</del> adverse effects from infrastructure that has national or regional significance <u>that is located in -by:</u> a) <del>Giving preference to avoiding their location in:</del> i. Areas of significant indigenous vegetation and significant habitats of indigenous fauna; and ii. Outstanding natural features, landscapes and seascapes; and iii. Areas of outstanding natural character; and iv. Outstanding water bodies or wetlands; and <u>By</u> <del>b) Where it is not possible to avoid locating in the areas listed in a) above, avoiding significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and</del> c) <del>Avoiding, remedying or mitigating other adverse effects on values; and</del> <del>d) b) Assessing the significance of adverse effects on those values, as detailed in Schedule 3 taking into account the measures to avoid, remedy or mitigate adverse effects</del> ; and <del>e) c) Considering where appropriate the use of offsetting, or other compensatory measures, for residual adverse effects on indigenous biodiversity that are significant and cannot be otherwise avoided, remedied or</del>	• The proposed management regime is not necessary or appropriate given the strategic importance of national and regional infrastructure assets. • It does not recognise that there are often locational, technical and/or functional constraints to infrastructure location and operation. • Where infrastructure development is proposed within any of the identified areas, this policy should require an assessment of the significance of adverse effects on those values as set out in d) taking into account the measures to avoid, remedy or mitigate those effects, and the overall benefits arising from the development.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<u>mitigated.</u>	
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Support	Retain policy as notified ( or similar wording to achieve relief).	This policy is supported as it seeks to protect infrastructure.
109	Energy	Policy 3.6.1 - Using existing renewable electricity generation structures and facilities	Amend	Amend as follows: " <del>Give preference to</del> <u>Recognise and provide for</u> the use of existing structures or facilities to increase the region's renewable electricity generation capacity <del>over developing new structures in new locations.</del> "	<ul style="list-style-type: none"> <li>• The MfE Implementation Guide for the NPSREG (2011) states that Policy B of the NPSREG reinforces the important contribution existing renewable energy assets make in advancing Government's renewable energy targets. The RPS should recognise the importance of such existing facilities, and enable their ongoing use and upgrading without undue regulatory control and constraint.</li> <li>• It would be more appropriate to recognise the importance of existing facilities, without stating that this preference overrides the development of new facilities.</li> </ul>
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	Amend the policy as follows: " <u>Enable the development of new and</u> protect the generation capacity of <u>existing</u> nationally or regionally significant renewable electricity generation activities, by: ... b) <del>Restricting</del> <u>Avoiding</u> the establishment of those activities that may result in reverse sensitivity effects."	<ul style="list-style-type: none"> <li>• Support the protection of the generation capacity of existing nationally or regionally significant renewable electricity generation activities.</li> <li>• This policy also needs to enable the development of such activities.</li> <li>• This would achieve consistency with the NPSREG, which explicitly includes retaining existing renewable energy generation assets and the development of new renewable generation assets (Policy B).</li> </ul>
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate that urban development takes place in a manner which takes into account the existing environment and minimises potential conflicts between incompatible activities.
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	<ul style="list-style-type: none"> <li>• Insert the following clause between b) and c): "<u>Avoiding urban development which constrains the ability of regionally significant infrastructure or industry to be developed and used without undue constraint that may arise from adverse effects relating to reverse sensitivity or safety; and</u>"</li> <li>• Renumbering clauses c) to h) accordingly.</li> </ul>	To effectively manage urban growth conflicts and reverse sensitivity effects should be considered, particularly with respect to the encroachment of incompatible activities around key infrastructure assets.
130	Hazardous substances and waste	Policy 3.9.1 - Integrating management of hazardous substances and waste	Support	Retain the policy as notified (or similar wording to achieve relief).	Because hazardous substances are managed by a number of different agencies an integrated approach will need to be adopted, taking into consideration the various roles and responsibilities at a national, regional and local level.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Oppose	Delete Policy 3.9.5.	<ul style="list-style-type: none"> <li>• It is not clear what implications this policy might have on development throughout the region.</li> <li>• Airports, ports, and other infrastructure and industrial activities are listed on the Ministry for the Environment's HAIL list.</li> <li>• This policy could be interpreted that facilities that use hazardous substances will become sites of contaminated land and therefore should be avoided.</li> </ul>
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend the policy as follows: " <u>To recognise and provide for the protection of historic heritage resource of the region from inappropriate subdivision, use and development by:</u> a) <u>Identifying and assessing the significance of the historic heritage resources within the region;</u> b) <u>Having regard to any relevant entry in the Historic Places register in the process of identifying and assessing the historic heritage resource;</u>	<ul style="list-style-type: none"> <li>• While it is appropriate to protect historic heritage from inappropriate subdivision, use and development, this policy goes further than RMA S6(f).</li> <li>• Iwi values, including the protection of wahi tapu and wahi taoka, are provided for in Chapter 1 and do not need to be repeated in this policy</li> <li>• The policy adopts a strong position on avoiding adverse effects on areas which might only have "suspected" heritage or cultural values. This is not considered an appropriate response.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>c) <u>Considering historic heritage items, places, or areas of significance or importance to communities in the process of identifying and assessing the historic heritage resource;</u></p> <p>d) <u>Recognising that knowledge about some historic heritage may be culturally sensitive and support protection of those areas through the maintenance of silent files held by local authorities;</u></p> <p>e) <u>Recognise that there may be sites of historic heritage which are unknown and having appropriate accidental discovery protocols in place to manage the discovery of such features</u></p>	
166	Objectives on use and enjoyment of natural and built environment	Objective 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Oppose	Amend Objective 4.5 as follows: "Adverse effects <u>arising from the development use of Otago's natural and physical resources are avoided, remedied or mitigated</u> -of using and enjoying Otago's natural and built environment are minimised."	<ul style="list-style-type: none"> <li>Reference to enjoyment is vague and subjective.</li> <li>The objective should relate to the development and use of Otago's natural and physical resources.</li> <li>It should also seek to avoid, remedy or mitigate adverse effects on such resources.</li> </ul>
169	Management of adverse effects	Policy 4.5.2 - Applying an adaptive management approach	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate to recognise and enable the use of adaptive management regimes in dealing with adverse effects from activities.
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend policy as follows: "Enable offsetting of adverse effects on indigenous biodiversity values, <del>only</del> <u>including</u> when: ...."	<ul style="list-style-type: none"> <li>It is useful to enable offsetting in certain situations.</li> <li>It is unclear why the ability to offset adverse effects on indigenous biodiversity has been limited to activities with a functional necessity to locate in areas of significant biodiversity.</li> <li>Alliance seeks to broaden the opportunities to consider offsetting.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	<p>Add methods to require that:</p> <ul style="list-style-type: none"> <li>a region wide landscape/features and natural character assessment to determine areas of outstanding natural character, and outstanding landscape areas and features is carried out; and</li> <li>a region wide assessment of significant indigenous vegetation and habitats of significant indigenous fauna is carried out.</li> </ul> <p>These assessments could be carried out by the Regional Council, or as a collaborative effort between territorial authorities and the Regional Council.</p>	<p>Alliance considers it important the region's:</p> <ul style="list-style-type: none"> <li>outstanding natural landscapes and features,</li> <li>areas of outstanding natural character (including in the coastal environment), and</li> <li>significant indigenous vegetation and habitats of significant indigenous fauna</li> </ul> <p>are identified at a regional level.</p>
249	Glossaries	Glossary	Amend	Lifeline utilities - amend the definition of "lifeline utilities" to specifically refer to the infrastructure, buildings, ancillary equipment and activities that are undertaken by the entities referred to in the Civil Defence Emergency Act.	<ul style="list-style-type: none"> <li>Support the inclusion of "lifeline utilities" as part of the RPS.</li> <li>The definition contained within the Civil Defence Emergency Management Act refers to entities rather than facilities.</li> </ul>

### 86 New Zealand Petroleum and Minerals

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Amend to correctly interpret and apply the RMA, and to give appropriate recognition to petroleum, mineral and aggregate resources, and make provision for their use.	<ul style="list-style-type: none"> <li>Given recent caselaw, the use of the term "avoid" in the RPS will result in lower order planning instruments preventing activities with a perceptible adverse effects on those values.</li> <li>The policy framework will potentially significantly restrict or curb the use and development of minerals across the region. This is inconsistent with proposed Objective 4.3.</li> <li>The benefits of new NZP&amp;M surveys and Glass Earth Gold Limited</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					surveys will not be able to be realised where they coincide with areas/values underpinned by "avoidance" policies. <ul style="list-style-type: none"> <li>Prevention of what can be an appropriate use and development may not always be the appropriate resource management outcome.</li> </ul>
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Support	Retain provision without amendment.	The provision reflects the ORC's current and desired practice in relation to Kai Tahu and its obligation under s8 RMA.
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Support	Retain provision without amendment.	The provision reflects the ORC's current and desired practice in relation to Kai Tahu and its obligation under s8 RMA.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend limb a) of Policy 1.2.3 as follows: "a) Avoiding , <u>remedying, or mitigating</u> significant adverse effects on those values and sites, as detailed in Schedule 3; ..."	<ul style="list-style-type: none"> <li>Given recent caselaw, the use of the term "avoid" in the RPS will result in lower order planning instruments preventing activities with a perceptible adverse effects on those values. Given the breadth of sites of possible cultural significance as listed in Schedule 1C, prevention of development may not always be the appropriate resource management outcome.</li> <li>The policy framework will potentially significantly restrict or curb the use and development of minerals across the region. This is inconsistent with proposed Objective 4.3.</li> <li>The benefits of new NZP&amp;M surveys and Glass Earth Gold Limited surveys will not be able to be realised where they coincide with areas/values underpinned by "avoidance" policies.</li> </ul>
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Support	Support.	No reason given.
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend limbs a) and b) of policy 2.2.2 as follows: "a) avoiding , <u>remedying, or mitigating</u> adverse effects on those values which contribute to the area or habitat being significant; and b) avoiding , <u>remedying, or mitigating</u> significant adverse effects on other values of the area or habitat; and".	<ul style="list-style-type: none"> <li>Given recent caselaw, the use of the term "avoid" in the RPS will result in lower order planning instruments preventing activities with a perceptible adverse effects on those values.</li> <li>The policy framework will potentially significantly restrict or curb the use and development of minerals across the region. This is inconsistent with proposed Objective 4.3.</li> <li>The benefits of new NZP&amp;M surveys and Glass Earth Gold Limited surveys will not be able to be realised where they coincide with areas/values underpinned by "avoidance" policies.</li> <li>Prevention of what can be an appropriate use and development may not always be the appropriate resource management outcome</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend limb a) of policy 2.2.4 as follows: "a) avoiding , <u>remedying, or mitigating</u> adverse effects on those values which contribute to the significance of the natural feature, landscape or seascape; and".	<ul style="list-style-type: none"> <li>Given recent caselaw, the use of the term "avoid" in the RPS will result in lower order planning instruments preventing activities with a perceptible adverse effects on those values. Prevention of what can be an appropriate use and development may not always be the appropriate resource management outcome.</li> <li>In the current Central Otago District Plan, "outstanding natural features and landscapes" are coincident with many of Otago's most prospective hard-rock gold fields. The policy framework will potentially significantly restrict or curb the use and development of minerals across the region. This is inconsistent with proposed Objective 4.3.</li> <li>The benefits of new NZP&amp;M surveys and Glass Earth Gold Limited surveys will not be able to be realised where they coincide with areas/values underpinned by "avoidance" policies.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Amend limb a) of policy 2.2.6 as follows: "a) avoiding , <u>remedying, or mitigating</u> significant adverse effects on those values which contribute to the special amenity of the	<ul style="list-style-type: none"> <li>Given recent caselaw, the use of the term "avoid" in the RPS will result in lower order planning instruments preventing activities with a perceptible adverse effects on those values.</li> <li>The policy framework will potentially significantly restrict or curb the</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				landscape or high value of the natural feature; and".	use and development of minerals across the region. This is inconsistent with proposed Objective 4.3. <ul style="list-style-type: none"> <li>The benefits of new NZP&amp;M surveys and Glass Earth Gold Limited surveys will not be able to be realised where they coincide with areas/values underpinned by "avoidance" policies.</li> <li>Prevention of what can be an appropriate use and development may not always be the appropriate resource management outcome</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend limb a) of policy 2.2.13 as follows: "a) avoiding <u>remedying, or mitigating</u> significant adverse effects, including cumulative adverse effects, on those values which contribute to the water body or wetland being outstanding; and."	<ul style="list-style-type: none"> <li>Given recent caselaw, the use of the term "avoid" in the RPS will result in lower order planning instruments preventing activities with a perceptible adverse effects on those values.</li> <li>The policy framework will potentially significantly restrict or curb the use and development of minerals across the region. This is inconsistent with proposed Objective 4.3.</li> <li>The benefits of new NZP&amp;M surveys and Glass Earth Gold Limited surveys will not be able to be realised where they coincide with areas/values underpinned by "avoidance" policies.</li> <li>Prevention of what can be an appropriate use and development may not always be the appropriate resource management outcome</li> </ul>
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Amend limb a) of policy 2.2.15 as follows: "a) avoiding <u>remedying, or mitigating</u> significant adverse effects on those values which contribute to the soil being highly valued; and".	<ul style="list-style-type: none"> <li>Given recent caselaw, the use of the term "avoid" in the RPS will result in lower order planning instruments preventing activities with a perceptible adverse effects on those values.</li> <li>The policy framework will potentially significantly restrict or curb the use and development of minerals across the region. This is inconsistent with proposed Objective 4.3.</li> <li>The benefits of new NZP&amp;M surveys and Glass Earth Gold Limited surveys will not be able to be realised where they coincide with areas/values underpinned by "avoidance" policies.</li> <li>Prevention of what can be an appropriate use and development may not always be the appropriate resource management outcome.</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Retain provision without amendment.	The objective is consistent with the RMA framework, including the statutory responsibility of regional councils "to achieve integrated management of the natural and physical resources of the region" as set out at s30 RMA.
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend limbs a) and c) of policy 3.8.3 as follows: "a) Avoid <u>remedy, or mitigate</u> development or fragmentation of land which undermines or forecloses the potential of rural land; or c) Avoid <u>remedy, or mitigate</u> unplanned demand for provision of infrastructure, including domestic water supply and waste disposal; and".	<ul style="list-style-type: none"> <li>Given recent caselaw, the use of the term "avoid" in the RPS will result in lower order planning instruments preventing activities with a perceptible adverse effects on those values.</li> <li>The policy framework will potentially significantly restrict or curb the use and development of minerals across the region. This is inconsistent with proposed Objective 4.3.</li> <li>The benefits of new NZP&amp;M surveys and Glass Earth Gold Limited surveys will not be able to be realised where they coincide with areas/values underpinned by "avoidance" policies.</li> <li>Prevention of what can be an appropriate use and development may not always be the appropriate resource management outcome.</li> <li>Farmland use for mining can be rehabilitated and restored as more productive farmland.</li> </ul>
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Amend policy 3.9.5 as follows: "Policy 3.9.5 Avoiding <u>remedying, or mitigating</u> the creation of new contaminated land Avoid <u>remedy, or mitigate</u> the creation of new contaminated land."	<ul style="list-style-type: none"> <li>Given recent caselaw, the use of the term "avoid" in the RPS will result in lower order planning instruments preventing activities with a perceptible adverse effects on those values.</li> <li>The policy framework will potentially significantly restrict or curb the use and development of minerals across the region. This is inconsistent with proposed Objective 4.3.</li> <li>The benefits of new NZP&amp;M surveys and Glass Earth Gold Limited surveys will not be able to be realised where they coincide with areas/values underpinned by "avoidance" policies.</li> <li>Prevention of what can be an appropriate use and development may</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					not always be the appropriate resource management outcome. <ul style="list-style-type: none"> <li>• The necessity to provide for the development of tailings impoundments in proximity to gold mining sites.</li> </ul>
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	<ul style="list-style-type: none"> <li>• Amend limbs c) and d) of Policy 4.2.3 as follows:            "c) avoiding <u>remedying, or mitigating</u> adverse effects on those values which contribute to the area or place being of regional or national significance; and            d) avoiding <u>remedying, or mitigating</u> significant adverse effects on other values of areas or places of historic heritage; and"</li> <li>• Such further relief as is appropriate to give effect to this submission, including deletion of limbs f) and g).</li> </ul>	<ul style="list-style-type: none"> <li>• Given recent caselaw, the use of the term "avoid" in the RPS will result in lower order planning instruments preventing activities with a perceptible adverse effects on those values.</li> <li>• The policy framework will potentially significantly restrict or curb the use and development of minerals across the region. This is inconsistent with proposed Objective 4.3.</li> <li>• The benefits of new NZP&amp;M surveys and Glass Earth Gold Limited surveys will not be able to be realised where they coincide with areas/values underpinned by "avoidance" policies.</li> <li>• Prevention of what can be an appropriate use and development may not always be the appropriate resource management outcome.</li> </ul>
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	<p>Amend policy 4.3.6 as follows:            "Policy 4.3.6 Managing locational needs for mineral and gas <u>petroleum</u> exploration, extraction and processing            Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by:            a) <u>Giving preference to avoiding their location</u>  <u>Implementing methods to achieve integrated management of natural and physical resources,</u>  <u>in particular</u> in:            ...            b) Restricting the establishment of those activities in areas used for mineral and gas <u>petroleum</u> exploration, extraction and processing that may result in reverse sensitivity effects."</p>	<ul style="list-style-type: none"> <li>• Given recent caselaw, the use of the term "avoid" in the RPS will result in lower order planning instruments preventing activities with a perceptible adverse effects on those values.</li> <li>• Prevention of what can be an appropriate use and development may not always be the appropriate resource management outcome.</li> <li>• Mineral and petroleum deposits are not transferable and can only be mined where they exist.</li> <li>• The protection of s6 RMA matters of national importance.</li> <li>• The desirability and statutory responsibility of regional councils to "to achieve integrated management of the natural and physical resources of the region" as set out at s30 RMA.</li> <li>• "Gas" is included in the s2(1) definition of petroleum in the Crown Minerals Act 1991 to which the RMA defers to for its definition of "mineral".</li> </ul>
169	Management of adverse effects	Policy 4.5.2 - Applying an adaptive management approach	Support	Retain provision without amendment.	The objective is consistent with the RMA framework.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	<p>Amend policy 4.5.6 as follows:            "Policy 4.5.6 Managing adverse effects from mineral and gas <u>petroleum</u> exploration, extraction and processing            Minimise adverse effects from the exploration, extraction and processing of minerals, by:            a) <u>Giving preference to avoiding their location</u>  <u>Implementing methods to achieve integrated management of natural and physical resources,</u>  <u>in particular</u> in:            ...            b) Where it is not possible to avoid locating <u>mineral and petroleum activities are located</u> in the areas listed in a) above, avoiding, <u>remedying, or mitigating</u> significant adverse effects of the activity on those values that contribute to the significant or outstanding nature of those areas; and            ...            h) <u>Applying a precautionary approach to assessing the effects of the activity, where there</u></p>	<ul style="list-style-type: none"> <li>• Prevention of what can be an appropriate use and development may not always be the appropriate resource management outcome</li> <li>• Consistent with Policy 4.3.6.</li> <li>• "Gas" is included in the s2(1) definition of petroleum in the Crown Minerals Act 1991 to which the RMA defers to for its definition of "mineral".</li> <li>• A "precautionary approach" is not strictly adhered to in the RMA because it is not a "no-risk" statute. The Courts have utilised the concept as part of the "overall judgement" but the Supreme Court rejected that approach in the King Salmon decision, at least in respect of plan changes.</li> <li>• The application of the "precautionary approach" to managing adverse effects of minerals and petroleum use is inconsistent with the manner in which the PRPS proposes to regulate activities for industries that may have similar effects, including infrastructure (policy 3.5.2).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				is scientific uncertainty, and potentially significant or irreversible adverse effects."	
258	Other comments	Consequential amendments & other amendments providing relief	Did not specify	Seek such similar and consequential relief as necessary to address submissions.	No reason given.
270	Objectives on high quality natural resources	Introduction to Objective 2.2	Amend	Amend qualifying statement for Objective 2.2 (p.32) as follows: "Otago has many unique landscapes, [...]. Giving these a higher level of protection ensures they will be retained, while consumptive use of resources, <u>where practicable</u> , will be directed to areas where adverse effects are more acceptable."	The qualifying statement does not recognise that in practice mineral and petroleum deposits are not transferable and can only be mined where they exist.

### 87 Blueskin Resilient Communities Trust

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Oppose	Delete policy, or if the level of protection is not reduced, amend Policy by: <ul style="list-style-type: none"> <li>identifying areas to be afforded protection in the Proposed RPS;</li> <li>including reference to a new method 9 - Landscape Maps.</li> </ul>	<ul style="list-style-type: none"> <li>Recognition of special amenity landscapes introduces a new threshold of protection of landscapes and natural features. The level of protection conferred by the PRPS is similar to matters or national importance under RMA s6 and is too high for such landscapes.</li> <li>Such landscapes are often working landscapes used for a variety of activities. Requirement for effects to be avoided potentially fetters land uses to the detriment of social, cultural and economic wellbeing of the community.</li> <li>Identifying those areas in the PRPS would enable the community to assess the potential impact of the PRPS on their land uses.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Oppose	Delete policy, or if the policy is to remain, amend Policy to read: <del>"Protect or enhance the</del> <u>Minimise the effect of activities on values of special amenity landscapes and highly valued natural features,</u> by: a) <u>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</u> a) <del>b) Avoiding where possible significant adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural features; and</del> c) <u>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</u> b) <del>c) Avoiding, remedying or mitigating other adverse effects on other values; and...</del> "	<ul style="list-style-type: none"> <li>Recognition of special amenity landscapes introduces a new threshold of protection of landscapes and natural features. The level of protection conferred by the PRPS is similar to matters or national importance under RMA s6 and is too high for such landscapes.</li> <li>Such landscapes are often working landscapes used for a variety of activities. Requirement for effects to be avoided potentially fetters land uses to the detriment of social, cultural and economic wellbeing of the community.</li> </ul>
50	Highly valued natural resources - the coastal environment	Policy 2.2.8 - Identifying areas of high and outstanding natural character in the coastal environment	Amend	Amend as follows: <ul style="list-style-type: none"> <li>" Identify areas and values of high and outstanding natural character in the coastal environment, using the attributes detailed in <del>Policy 2.1.8</del> <u>Schedule 2</u>."</li> <li>Add Method 9: Landscape Maps.</li> <li>Include attributes from Policy 2.1.8 in a new schedule.</li> </ul>	<ul style="list-style-type: none"> <li>The policy introduces an extremely high threshold of protection for matters that are not of national importance.</li> <li>The lack of detail regarding where this should occur creates risk of unintended consequences for land users.</li> <li>The reference to attributes in Policy 2.1.8 rather than in a scheduled is inconsistent with approach for other features.</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend Policy 2.2.9 as follows: "Preserve or enhance the natural character values of the coastal environment, by: a) <u>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</u>	<ul style="list-style-type: none"> <li>The policy introduces an extremely high threshold of protection for matters that are not of national importance.</li> <li>The lack of detail regarding where this should occur creates risk of unintended consequences for land users.</li> <li>The reference to attributes in Policy 2.1.8 rather than in a scheduled</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				a) <del>b)</del> Avoiding adverse effects on those values which contribute to the outstanding natural character of an area; and b) <del>c)</del> Avoiding <u>where possible</u> significant adverse effects on those values which contribute to the high natural character values of an area; and c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and ..."</del>	is inconsistent with approach for other features.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Oppose	Delete or amend provisions as follows: <del>"Protection, use and development of natural and physical resources recognises environmental constraints</del> <u>Enable use and development where there is a functional necessity for the activity to be located to utilise the natural and physical resource."</u>	<ul style="list-style-type: none"> <li>Objective 3.1 does not add anything to the regulatory assessment framework.</li> <li>More appropriate to articulate concerns about providing for activities with a functional necessity of a particular location in a positive way.</li> <li>Regulatory authorities are not well placed to assess the "functional necessity" of a particular location for a proposed activity and this should not be a matter for Council to determine.</li> </ul>
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Oppose	Delete or amend as follows: <del>"Recognise the natural and physical environmental constraints of an area, the effects of those constraints on activities, and the effects of those activities on those constraints</del> <u>Recognise the functional necessity for activities to be located in particular areas where they rely on access to natural and physical resources in that location whilst considering the effects of the those activities, including:</u> a) <del>The availability of natural resources necessary to sustain the activity; and</del> <u>The nature of the resource to be utilised by the activity;</u> ... c) <del>The sensitivity of the natural and physical resources to adverse effects from the proposed activity</del> <u>and use; and</u> d) <del>Whether the activity or resource is readily transferable or relocatable for the activity to occur in the particular area.</del> d) <del>Exposure of the activity to natural and technological hazard risks; and</del> e) <del>The functional necessity for the activity to be located where there are significant constraints."</del>	<ul style="list-style-type: none"> <li>Objective 3.1 does not add anything to the regulatory assessment framework.</li> <li>More appropriate to articulate concerns about providing for activities with a functional necessity of a particular location in a positive way.</li> <li>Regulatory authorities are not well placed to assess the "functional necessity" of a particular location for a proposed activity and this should not be a matter for Council to determine.</li> </ul>
92	Objectives on resilience, health and safety	Objective 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Support	Support.	Climate change is a significant risk to communities.
93	Climate change	Policy suite 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Support	Support policy suite subject to amendment to Policy 3.3.2 (c).	<ul style="list-style-type: none"> <li>Climate change is a significant risk to communities.</li> <li>More explicit support for activities that mitigate climate change and reduce associated impacts should be included.</li> </ul>
95	Climate change	Policy 3.3.2 - Adapting to, or mitigating the effects of, climate change	Amend	Amend Policy 3.3.2 c) as follows: <u>"Enable and encourage activities that assist to reduce or mitigate the effects of climate change."</u>	<ul style="list-style-type: none"> <li>Climate change is a significant risk to communities.</li> <li>More explicit support for activities that mitigate climate change and reduce associated impacts should be included.</li> </ul>
96	Objectives on resilience, health and safety	Objective 3.4 - Good quality infrastructure and services meet	Support	Support this objective.	Good quality infrastructure and services are needed to meet community needs.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		community needs			
97	Infrastructure - general	Policy suite 3.4 - Good quality infrastructure and services meet community needs	Support	Support subject to amendment to Policy 3.4.1 (e).	Good quality infrastructure and services are needed to meet community needs.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend Policy 3.4.1 by adding the following: " <u>e) encourage the development of community based infrastructure projects that enhance the resilience and security of those communities.</u> "	<ul style="list-style-type: none"> <li>• Communities can develop greater resilience and become more sustainable if community based infrastructure is developed alongside regional and strategic infrastructure.</li> <li>• Suggested amendment should facilitate community and regional infrastructure and allow each to complement the other.</li> </ul>
108	Energy	Policy suite 3.6 - Energy supplies to Otago's communities are secure and sustainable	Amend	Add new policy as follows: " <u>Enable the identification of new renewable electricity generation activities by:</u> a) providing for activities associated with the investigation and identification of new sites for renewable electricity generation."	Proposed policy supports the investigation of new renewable electricity generation sites consistent with NESREG Policy G.
109	Energy	Policy 3.6.1 - Using existing renewable electricity generation structures and facilities	Oppose	Delete policy or amend as follows: "Policy 3.6.1 <u>Efficient use of</u> Using existing renewable electricity generation structures and facilities <u>Encourage the efficient</u> Give preference to the use of existing structures or facilities to increase <u>or maintain</u> the region's renewable electricity generation capacity <u>over developing new structures in new locations.</u> "	<ul style="list-style-type: none"> <li>• Support the purpose of this policy but have concerns that as drafted it will stifle new development which will thwart the goal of increasing capacity.</li> <li>• Rather than giving preference to existing facilities the policy should seek to encourage those facilities to be fully utilised.</li> <li>• The policy is contrary to the National Policy statement for Renewable Electricity Generation 2011 (NPSREG) which requires decision makers to recognise and provide for renewable electricity generation activities.</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	Amend policy 3.6.2 as follows: "Promote <u>and enable</u> small scale renewable electricity generation activities that: a) Increase the local community's resilience and security of energy supply; and b) Avoid, remedy or mitigate adverse effects from that activity."	<ul style="list-style-type: none"> <li>• Support policy subject to minor amendments to make provisions more enabling for small scale renewable development.</li> <li>• Enabling small scale renewable generation allows communities to improve security of supply and provide for their social, economic and cultural wellbeing.</li> <li>• More express recognition that small scale renewable development is important to the region and will provide a clear directive to districts to enable and provide for this development.</li> <li>• The changes will ensure policy more effectively gives effect to NPSREG policies A(b) and F.</li> </ul>
114	Energy	Policy 3.6.6 - Reducing long term demand for fossil fuels	Support	Support.	Reducing the long term need for fossil fuels reduces the greenhouse gas emission we as a region will make, and will consequently reduce our regional climate change impact.
115	Objectives on resilience, health and safety	Objective 3.7 - Urban areas are well designed, sustainable and reflect local character	Amend	Apply to all residential development, not only urban development.	<ul style="list-style-type: none"> <li>• Residential development in rural areas would also benefit from the direction in the objective and associated policies.</li> <li>• All residential development should be encourage to reduce its environmental footprint.</li> </ul>
116	Urban design	Policy suite 3.7 - Urban areas are well designed, sustainable and reflect local character	Amend	Apply to all residential development, not only urban development.	<ul style="list-style-type: none"> <li>• Residential development in rural areas would also benefit from the direction in the objective and associated policies.</li> <li>• All residential development should be encourage to reduce its environmental footprint.</li> </ul>
119	Urban design	Policy 3.7.2 - Encouraging use of low impact design techniques	Amend	<ul style="list-style-type: none"> <li>• Amend Policy 3.7.2 as follows: "Encourage the use of low impact design techniques in subdivision and development, to: a) Reduce potential adverse environmental effects, including on water and air quality; or b) <u>Reduce demand on infrastructure services, including on storm and wastewater infrastructure;</u> or"</li> <li>• Renumber subsequent provisions accordingly.</li> </ul>	<ul style="list-style-type: none"> <li>• Policy identifies a number of benefits of low impact design techniques.</li> <li>• The policy should also recognise and encourage other types of low impact design which would achieve the objectives associated with infrastructure provision (such as stormwater infrastructure through use of low impact stormwater systems and rain water capture or wastewater infrastructure through the use of grey water recycling systems).</li> </ul>
120	Urban design	Policy 3.7.3 - Designing for	Amend	Amend policy as follows:	<ul style="list-style-type: none"> <li>• Support policy as warmer buildings lead to healthier rooms and</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		warmer buildings		"Encourage the Design of subdivision and development (including renovations) must to reduce the adverse effects of Otago's colder climate, and higher demand and costs for energy, including by: a) Maximising passive solar gain; and b) <u>Incorporating energy saving technology into the development; and</u> c) Insulating to warmer standards than those set under building legislation; and d) <u>Making provision for solar hot water equipment to be installed including solar ready hot water cylinders, plumbing and ducting."</u>	communities. • Cost of poor quality housing to community is significant (health and energy costs), and can be readily reduced through more actively encouraging good design solutions to be employed at the outset. • Proposed policy does not identify all the opportunities to achieve this, or achieve the outcomes sought be renewable energy objectives
215	Method 9 - Funding	Method 9 - Funding	Amend	Add clause c) to the method as follows: " <u>(c) fund community groups and projects that are focused on climate change resilience, reduction of reliance on fossil fuels within the region and developing small scale renewable electricity generation.</u> "	<ul style="list-style-type: none"> <li>Recognised importance of community groups in achieving some of the objectives and policies of the RPS.</li> <li>These groups often have existing relationships and access to resources that cannot be mobilised by the Council.</li> <li>Many groups depend upon public funding to operate efficiently and Council funding can help catalyse this and encourage it to occur.</li> </ul>
218	Method 11 - Advocacy and Facilitation	Method 11.1 - Promotion	Amend	Add e) to method 11.1.4 as follows: " <u>e) Engage with community groups about issues associated with climate change resilience, cosy home initiatives and methods to reduce reliance on fossil fuels. Such engagement will utilise the "rich engagement model" as detailed in NIWA's Engaging Communities: Making it Work 2011.</u> "	<ul style="list-style-type: none"> <li>Community groups are best placed to advocate for individual communities.</li> <li>The use of the NIWA method will enable Council to engage with communities in a progressive and meaningful manner.</li> </ul>

### 88 Save The Otago Peninsula (STOP) Incorporated Society

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
7	Chapter B1 - Kai Tahu values	Chapter B1 - general requests	Support	Support.	Support the objectives in this chapter and acknowledge Kai Tahu's distinct status as a treaty partner.
107	Objectives on resilience, health and safety	Objective 3.6 - Energy supplies to Otago's communities are secure and sustainable	Support	Endorse the "Need" associated to Objective 3.6 (p. 45).	Endorse recognition of this need and the steps to achieve this goal.
115	Objectives on resilience, health and safety	Objective 3.7 - Urban areas are well designed, sustainable and reflect local character	Support	Support.	Endorse the concept of urban areas being well designed, sustainable and importantly reflected local character.
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	Add "landscape" to Policy 3.7.1 as a variable.	<ul style="list-style-type: none"> <li>Landscape appears to be missing from 3.7.1. Not adequately addressed in b).</li> <li>Even areas designated Outstanding Landscape Areas need constant vigilance, e.g. when considering the outstanding harbour landscape and the creeping built development occurring along its sides which can quickly have an adverse effect on the overall landscape.</li> <li>It is unclear how the DCC's Spatial Plan relates to this policy. This may be covered by Method 6.1.2 but it is unclear for inland areas of outstanding value other than tussock grasslands.</li> </ul>
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Support	Support.	No reason given.
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Support	Support.	Policy 3.8.1 is of particular importance to the Peninsula, specifically c) and d).
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban	Support	Support.	Policy 3.8.2 is of vital importance to the Otago Peninsula.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		growth boundaries or future urban development areas			
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Add a fourth sub item under 3.8.3 a): " <u>iv) have a cumulative negative effect on landscape values in such a way that they flow on to negatively affect tourism and local amenity areas.</u> "	No reason given.
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	Add visual landscapes.	<ul style="list-style-type: none"> <li>• The importance of visual landscapes is missing from this section, not only for locals but also economically for tourism.</li> <li>• This includes purely visual elements e.g. where the setting of the city, including the Otago Peninsula, is important to the perception of outstanding beauty appreciated by locals and visitors alike.</li> <li>• Landscape integrity can be easily compromised by cumulative built development.</li> </ul>
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Support	Support.	No reason given.
162	Making the most of available resources	Policy suite 4.4 - Otago's communities can make the most of the natural and built resources available for use	Support	Support.	No reason given.
167	Management of adverse effects	Policy suite 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Support	Support policy suite 4.5.1 to 4.5.5 - especially 4.5.4 and 4.5.5.	<ul style="list-style-type: none"> <li>• Hope this will lead to a more inclusive Pest Management Strategy that includes the viability of indigenous species and habitats for indigenous species rather than just those pest plants and animals that affect farmers. This would be more consistent with other councils, e.g. in recognising mustelids as pests.</li> <li>• Section 7.4 in the Chapter on Implementation shows a distinct change of policy re the effects of pests on indigenous biodiversity and will bring the ORC into line with other Regional Councils.</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Support	Support.	These conditions should make offsetting for indigenous biodiversity an extremely rare occurrence, not undertaken lightly.
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Delete "if practicable" from item d).	These conditions should make offsetting for indigenous biodiversity an extremely rare occurrence, not undertaken lightly.
176	Management of adverse effects	Policy 4.5.9 - Offsetting for air quality	Amend	Delete the options to opt out of improving air quality.	The policy offers a large number of reasons to opt out of improving air quality.
177	Roles and responsibilities	Roles and responsibilities	Amend	<ul style="list-style-type: none"> <li>• ORC should be taking the lead on the management of wetlands.</li> <li>• Amend to ensure that the management of wetlands is not restricted to the so-called "significant wetlands".</li> </ul>	<ul style="list-style-type: none"> <li>• The Society commends the co-operative approach between Regional Council and City and District Councils as advocated and would like to see this actively pursued.</li> <li>• The PRPS attributes the responsibility for the maintenance of indigenous biodiversity to the regional council. ORC has already moved to reduce its definition of wetlands to "Significant Wetlands" and does not cover most of the smaller wetland areas.</li> <li>• The "shared joint responsibility between the ORC and other local bodies" for the maintenance of indigenous biodiversity through the management of wetlands will result in neither taking the prime responsibility.</li> <li>• The society considers that ORC should be taking the lead here, but include not merely the defined "significant" wetland areas.</li> </ul>
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Amend	Add the development of a biodiversity strategy.	<ul style="list-style-type: none"> <li>• Believe the ORC needs to develop a Biodiversity Strategy, which would give the regional council an explicit leadership role in protecting natural values.</li> <li>• Previous consultation documents referred to the need to develop a Biodiversity Strategy.</li> <li>• Lately there has been no interest by the ORC to making a contribution to maintaining native biodiversity on the Otago Peninsula.</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
208	Method 7 - Strategies and Plans (non-RMA)	Method 7.5 - Pan-regional pest management strategy	Amend	Clarify when a pan-regional pest management strategy is appropriate but ensure the region still has its own strategy plan that fits its own region.	<ul style="list-style-type: none"> <li>• A pan regional pest strategy makes sense where there is a need to control pests across artificial boundaries and educational material on pest plants can easily be shared between regional councils to be cost effective.</li> <li>• Collaboration and cooperation is required to ensure that control species are the same on both sides of local body boundaries, but each area should have its own strategy and plan that can be consulted on locally.</li> <li>• Single pest management strategies over large areas may be counter productive if local conditions allow for local control, e.g. the Peninsula.</li> </ul>
210	Method 8 - Education and Information	Method 8 - Education and Information	Amend	Add information about pest plants and animals.	<ul style="list-style-type: none"> <li>• Information about pest plants and animals is missing from the list.</li> <li>• Made submissions on Annual Plans asking for material to be made available and not just on request. This can be done at a relatively low cost.</li> </ul>
224	Method 11 - Advocacy and Facilitation	Method 11.2.2 - Facilitation by regional council - compulsory	Amend	<ul style="list-style-type: none"> <li>• Delete wilding pines as example from 11.2.2</li> <li>• Create a new item specially for wilding pines.</li> </ul>	Wilding pines needs something more substantive than just 11.2.2., because of their importance on native biodiversity, water retention and the economics of farming and tourism.
226	Anticipated Environmental Results	Anticipated Environmental Results - General	Support	Support.	<ul style="list-style-type: none"> <li>• Monitoring is essential.</li> <li>• However, not clear how many of suggested measures would be implemented and the cost and complexity would be considerable.</li> </ul>
242	Anticipated Environmental Results	AER 3.7 - Urban areas can adapt to evolving standards & changing requirements of its inhabitants and surrounding natural and physical environment	Amend	Add a meaningful indicator that would measure the effects on the natural and physical environment.	The suggested indicators focus solely on building developments and transport infrastructure and whether these are showing signs of stress.
245	Anticipated Environmental Results	AER 4.3 - The effects of current human land management do not preclude future economic uses of land	Amend	Add an indicator based on visitor numbers.	There is no indicator to show that there has been no decline in tourism visitor numbers due to degradation of the environment/ landscape/ biodiversity.
251	Other comments	Implementation	Did not specify	<ul style="list-style-type: none"> <li>• Add a commitment for the regional, city and district councils to make a formal and explicit assessment of the impact that any budget proposals would have on the councils' ability to implement the Policy Statement.</li> <li>• Outline what funding principles could be applied to resourcing the achievement of the objectives.</li> </ul>	Concerned about the ORC and DCC's ability to implement the strategy in practice, unless sufficient funding is allocated to staffing and other support.
266	Objectives on high quality natural resources	Need 2.1	Amend	Amend the "Need" linked to Objective 2.1 (p. 26) by adding "...and identify and implement measures to reverse degradation."	The need is not only to understand the values and characteristics of Otago's natural and physical resources, but also to identify and implement measures to reverse degradation.
275	Objectives on resilience, health and safety	Need 3.3	Amend	Add other predicted impacts of climate change to the "Need" associated to Objective 3.3 (p.44).	The "Need" should refer not only to sea level rise but also all other predicted impacts of climate change (e.g. increased risk of flooding, landslips, erosion and drought), all of which are likely to have significant adverse effects on residents, farmers and other businesses on the Peninsula.

### 89 McKeague Consultancy Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Amend all policies using the word "avoid", particularly those without a qualifying statement such as "where avoidance is not possible, remedy...", to "avoid or minimise" or delete the word "avoid" and replace with "minimise".	Case law indicates that the word "avoid" in a RPS, would normally correspond with a prohibited activity in regional and district plans. This means particular circumstances of the activity cannot be taken into account. Use "avoid" sparingly in the RPS and only where it is certain the activity will never be appropriate.
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Add clarity as to whether, to be deemed "significant", resources need to meet all criteria	No reason given.

Ref	Issue	Provision	Position	Decision Requested or just one, in the relevant policies.	Reason for Decision Requested
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	<ul style="list-style-type: none"> <li>Amend to provide greater clarity on how the [Water Plan's] Regionally Significant Wetlands fit with the concept [in Policy 2.1.1 (c)].</li> <li>Retain Policy 2.1.1 (d).</li> <li>Replace "avoid" with "avoid and minimise" or "minimise" [in Policy 2.1.1 (n)].</li> </ul>	<ul style="list-style-type: none"> <li>Unclear how "outstanding water bodies / wetlands" compare with Regional Plan: Water's regionally significant wetlands.</li> <li>Clause d) gives indigenous biodiversity greater protection over other freshwater species, in accordance with the RMA.</li> <li>"Avoid" is too restrictive, particularly if it results in a prohibited activity.</li> <li>Unclear who has onus to avoid the adverse effects of pest species - land owner, ORC or source of the pest (e.g. forestry company). This is particularly problematic with existing pest problems.</li> <li>"Avoid" is at odds with approach in Policy 4.5.5 which talks about controlling adverse effects.</li> </ul>
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Remove the word "avoid" and replace with "avoid or minimise" or "minimise" [in Policy 2.1.5 (k) and (l)].	<ul style="list-style-type: none"> <li>"Avoid" is too restrictive, particularly if it results in a prohibited activity status.</li> <li>Policy is overly restrictive, unrealistic and impossible to implement and monitor effectively, because any foreign substance can contaminate soil.</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	<ul style="list-style-type: none"> <li>Replace "avoid" with "avoid and minimise" or "minimise" [in Policy 2.2.4 (a)].</li> <li>Delete [Policy 2.2.4] (b).</li> </ul>	<ul style="list-style-type: none"> <li>"Avoid" is too restrictive, particularly if it results in a prohibited activity status.</li> <li>In Clause (b), unclear what other values are being protected. If they do not contribute to the area or habitat being significant, they may actually be competing values.</li> <li>Extends beyond the protection or enhancement of the values that contribute to the area or habitat being significant.</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Oppose	<ul style="list-style-type: none"> <li>Delete Policy 2.2.5 and remove reference to special amenity landscapes and highly valued natural features.</li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>Make it very clear what a special amenity landscape and highly valued natural feature is, and provide different criteria for these from outstanding natural features, landscapes and seascapes</li> </ul>	<ul style="list-style-type: none"> <li>There is a large body of practice and case law that assists with the identification of outstanding features and landscapes.</li> <li>The concept of "special amenity landscapes and highly valued natural features" is new, and the attributes to be used to identify these are the same as those to be used for the identification of outstanding features and landscapes. No guidance is given as to how to differentiate between what is outstanding from what is special or highly valued.</li> </ul>
54	Highly valued natural resources - outstanding water bodies	Policy 2.2.12 - Identifying outstanding water bodies and wetlands	Amend	<ul style="list-style-type: none"> <li>Provide greater detail of what constitutes a significant value.</li> <li>Provide clarity around what a hydrological value is.</li> <li>Provide clarity as to whether all of these criteria need to be present or just one.</li> </ul>	There is a lack of clarity around how these values will be assessed: what is a significant recreational value, or hydrological value? Do all values need to be present? How do the values in (b) get assessed - through reference to the attributes in Schedule 4?
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	<ul style="list-style-type: none"> <li>Replace "avoid" with "avoid and minimise" or "minimise" [in Policy 2.2.13].</li> <li>Delete [Policy 2.2.13] (b).</li> </ul>	<ul style="list-style-type: none"> <li>"Avoid" is too restrictive, particularly if it results in a prohibited activity status.</li> <li>Paragraph (b) of the policy adds nothing to what is already in the RMA and is unnecessary.</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	<ul style="list-style-type: none"> <li>Include highly productive soils.</li> <li>Include an "or" in the list.</li> </ul>	<ul style="list-style-type: none"> <li>The criteria in this policy are specific and exclusive and therefore should also include soils that are highly productive (rather than only those that are versatile).</li> <li>Need more clarity as to whether soils have to meet all the criteria, or just one (ie use "and" or "or" in the list). This comment applies equally to a number of other policies in the proposed RPS.</li> </ul>
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	<ul style="list-style-type: none"> <li>Replace "avoid" with "avoid and minimise" or "minimise" [in Policy 2.2.15 a)].</li> <li>Delete [Policy 2.2.15] (b).</li> </ul>	<ul style="list-style-type: none"> <li>"Avoid" is too restrictive, particularly if it results in a prohibited activity status.</li> <li>Paragraph (b) of the policy adds nothing to what is already in the RMA and is unnecessary.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend 3.8.3(a)(i) by replacing "avoid" with "avoid and minimise" or "minimise".	Support the principle in (a)(i) of policy, but "avoid" is too restrictive, particularly if it results in a prohibited activity status.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>Amend (d) to make it clearer that primary production is one of the key priority uses for water and soil.</li> </ul>	<ul style="list-style-type: none"> <li>It is unclear which effects (d) is aimed at, and how this will be managed under the RMA, which focuses on the effects of activities, and generally operates on a first come first served basis.</li> <li>If it is intended that priority in rural areas is for water and soil to be used for primary production, then more clarity is needed.</li> </ul>
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Replace "avoid" with "avoid and minimise" or "minimise".	The use of the word 'avoid' is too restrictive, especially as many rural activities will contaminate land to some extent. "Avoid" is too restrictive, particularly if it results in a prohibited activity status.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend to provide greater clarity as to how competing values and uses might be weighed against each other, possibly by adding another paragraph - "(d) enable water use and storage that adequately mitigates adverse effects on public access".	It is unclear how this policy might impact on water use and storage — how these sometimes competing values might be balanced against each other.
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Correct the inconsistency between Policy 2.2.14 and Policy 4.3.1(b), by: <ul style="list-style-type: none"> <li>referring to "highly valued soils as outlined in Policy 2.2.14"; or</li> <li>including the full list of criteria contained in Policy 2.2.14.</li> </ul>	Support this policy in general, however (b) seems to be at odds with Policy 2.2.14, as that policy identifies a range of other criteria which may contribute to soils being highly valued.
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Amend	Finish policy after "yield" and delete (a) and (b).	<ul style="list-style-type: none"> <li>Policy too specific in its focus on 2 issues only - forestry and conversion of tussock grasslands - without properly addressing either.</li> <li>Other activities/issues can affect water yield, e.g. wilding pine spread from existing forest.</li> <li>Policy should be more general, and other plans should then address specific issues affecting dry catchments in more detail.</li> </ul>
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	<ul style="list-style-type: none"> <li>Amend (b) by replacing "requiring" with "give preference to..."</li> <li>Amend (c) to: "Encouraging collective coordination and collaborative catchment management".</li> <li>Provide clarity within the RPS as to how competing values and uses should be evaluated and weighed against each other.</li> </ul>	<ul style="list-style-type: none"> <li>While it is often desirable to require infrastructure that increases efficiency, the wider implications of this policy should be able to be considered, including increasing reliance on infrastructure using fossil fuels and energy. At odds with Policy 3.6.6 "reduce the long term demand for fossil fuels from Otago's communities..."</li> <li>Consider whether (c) leaves the door sufficiently open for different approaches in the future (other than rationing). Policy may be too specific - words such as "collaborative catchment management" may be broader.</li> <li>Paragraph (d) may be at odds with other policies in the proposed RPS - e.g. Policy 2.1.1(h) and Policy 2.2.13. Guidance should be provided on how competing policies should be evaluated and weighted, to reduce uncertainty during consent application processes.</li> </ul>
207	Method 7 - Strategies and Plans (non-RMA)	Method 7.4 - Pest management strategy	Amend	Include another paragraph: "(iv) have adverse effects on water yield in dry catchments".	While the use of the word "including" does not exclude pest species that have other types of adverse effects, it does provide an indication of the types of effects that will be most readily considered. Missing from this list is the effect of pest species on water yield or grazing species.
224	Method 11 - Advocacy and Facilitation	Method 11.2.2 - Facilitation by regional council - compulsory	Support	Retain.	Indicates ORC will continue supporting water management groups.

### 90 Wakatipu Wilding Conifer Control Group

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
207	Method 7 - Strategies and Plans (non-RMA)	Method 7.4 - Pest management strategy	Amend	Amend method 7.4.1 as follows: <u>iv) Have adverse effects on significant outstanding or amenity landscapes</u> <u>v) Have adverse effects on water catchments</u> <u>[c] Avoid, or minimise as far as practicable, the risk of wilding tree spread, through the location</u>	<ul style="list-style-type: none"> <li>Wilding conifers one of the biggest issues facing Otago's high country.</li> <li>The battle to gain control of areas with wilding issues can be "won", if work completed now. "A stitch in time saves nine".</li> <li>Uncontrolled spread of wilding conifers impact on: visual amenity (which is important to the local economy through tourism), water yield,</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<u>of planting, design of planting, species selection and management, once planting has occurred. (d)] Include provisions in a Regional Pest Management Strategy to assist in avoiding the risk of wilding tree spread, including consideration of specific non-regulatory methods such as rates relief, monitoring, and dissemination of information/ education, that may assist parties in controlling the further spread of wilding trees.</u>	productive farmland (the timber in wilding conifers has little economic use but a closed conifer canopy prevents grass growth for grazing), flora and fauna endemic to the region (once the conifer canopy closes, nothing grows underneath), historic features and archaeological sites (wildings are obscuring historic sites in Skippers, Queenstown), and the natural bush line.
215	Method 9 - Funding	Method 9 - Funding	Support	<ul style="list-style-type: none"> <li>• Support that ORC fund community groups and projects with aims that complement RPS objectives and policies, and C contribute funding to groups such as the Wakatipu Wilding Conifer Control Group (WCG).</li> <li>• That ORC actively contribute to funding the fight against wilding conifers in order to protect our regional landscapes, water resources, productive farmland, native flora and fauna and historic features.</li> </ul>	<ul style="list-style-type: none"> <li>• Wilding conifers one of the biggest issues facing Otago's high country.</li> <li>• The battle to gain control of areas with wilding issues can be "won", if work completed now. "A stitch in time saves nine".</li> <li>• Uncontrolled spread of wilding conifers impact on: visual amenity (which is important to the local economy through tourism), water yield, productive farmland (the timber in wilding conifers has little economic use but a closed conifer canopy prevents grass growth for grazing), flora and fauna endemic to the region (once the conifer canopy closes, nothing grows underneath), historic features and archaeological sites (wildings are obscuring historic sites in Skippers, Queenstown), and the natural bush line.</li> </ul>
217	Method 11 - Advocacy and Facilitation	Method 11 - Advocacy and Facilitation	Amend	<ul style="list-style-type: none"> <li>• Support the recognition of outstanding or amenity landscapes in relation to describing the effects and management of wilding conifers.</li> <li>• Change the facilitative role of the Otago Regional Council to an active, functioning, operating role.</li> </ul>	<ul style="list-style-type: none"> <li>• The WCG would like to recognise and commend ORC on their inclusion of "outstanding or amenity landscapes" when describing the effects and management of wilding conifers.</li> <li>• Wilding conifer are one of the biggest issues facing the high country of Otago.</li> <li>• Wilding spread is exponential, meaning what thousands of dollars can accomplish today, millions will be needed if the problem is not dealt with.</li> <li>• The wilding issue in the Otago region is currently at a point where the battle to gain control of areas can be 'won' if the work is completed now – "a stitch in time saves nine". What is required to reach this point is financial support for control work from ORC</li> </ul>

### 91 SouthCoast Boardriders Association

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Support	Implement all of the excellent ideals espoused in Part A 'The Introduction'	Identify and recognise the resources of the Otago regional coastline as valuable.
52	Highly valued natural resources - the coastal environment	Policy 2.2.10 - Identifying surf breaks of national importance	Amend	Recognition of "Surf Breaks of Regional Significance". We feel it is an appropriate time for an inventory of these.	<ul style="list-style-type: none"> <li>• An inventory of the surf breaks of the Otago region needs to categorise and value more than just those that will draw the experts to our shores: the region is blessed with a package of nursery, intermediate and other excellent breaks which nurture our own community as much as those who visit.</li> <li>• Such an inventory could possibly be researched and mapped under policy 2.2.8, in consultation with the South Coast Board Riders and the local surfing community..</li> <li>• Would bring Coast Plan up to speed with other significant surfing destinations such as Taranaki.</li> </ul>
53	Highly valued natural resources - the coastal environment	Policy 2.2.11 - Managing surf breaks of national importance	Amend	<ul style="list-style-type: none"> <li>• Afford same level of protection to the Regional Surf Breaks when they are gazetted;</li> <li>• Manage so that all surf breaks are subject to the pursuit of remedy and mitigation, should the unthinkable occur (e.g. Rena).</li> </ul>	<ul style="list-style-type: none"> <li>• The significance of Otago's wealth of surf breaks cannot be overstated and are a major draw cards for tourists.</li> <li>• The region is blessed with a package of nursery, intermediate and other excellent breaks which nurture our own community as much as those who visit.</li> </ul>
59	Natural systems and	Policy suite 2.3 - Natural	Amend	Regarding the management and administration	<ul style="list-style-type: none"> <li>• This has been of particular concern at St Clair over the years. Also</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	interdependencies	resource systems and their interdependencies are recognised		of the Coastal Environment, clarify the responsibilities of each Council and whom to contact in situations where the land meets the sea.	see comments on Objective 3.3 and 3.4. <ul style="list-style-type: none"> <li>Integration of management means working together with some clear delineation of responsibilities.</li> <li>The infrastructure failure at St Clair has made access dangerous, and frustrated local rescue services (St Clair and St Kilda Surf Lifesaving Clubs). Access for the public at large is a serious issue for all concerned.</li> <li>Integration of management means working together with some clear delineation of responsibilities, some of which we (SCBRA) would be very amenable to being involved in any processes that will be undertaken moving forward.</li> </ul>
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Support	Support.	Method 4.1.6 - Council's undertaking to "maintain and wherever possible enhance access to Surf Breaks of National Significance" is well received.
199	Method 6 - Research, Monitoring and Reporting	Method 6.2 - Research	Amend	Mapping the inventory of Surf breaks and their swell corridors may also be addressed as part of the process required by Method 6.2.1 b).	No reason given.

### 92 Holcim (New Zealand) Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	<ul style="list-style-type: none"> <li>Recognise the need to protect mineral resources from encroachment by incompatible land uses that could reasonably be located elsewhere.</li> <li>Recognise that rural areas do and could include appropriate industrial activities which should not be compromised by other activities (e.g. residential and rural-residential activities).</li> </ul>	<ul style="list-style-type: none"> <li>The PRPS does not contain appropriate or sufficient provisions that promote the responsible use of minerals, recognising they are fixed in location, and need to remain available for future generations.</li> <li>Mineral processing do occur in rural areas and must locate there because of the presence of the mineral resource. The effects of mineral processing activities must be properly managed in the rural environment.</li> <li>A sustained supply of minerals and aggregate is essential for the continued development of the region and wider New Zealand. Locally sourced low cost minerals and aggregate reduce infrastructure costs and development projects, and is important to economic wellbeing.</li> <li>This requires finding new sources to meet demand well in the future. This is consistent with the RMA S7(b) matter of "efficient use and development of physical and natural resources".</li> <li>Under the RMA, economic wellbeing considerations are intertwined with the concept of sustainable management of natural and physical resources.</li> </ul>
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Support	Retain as notified.	<ul style="list-style-type: none"> <li>Promotes sustainable management, achieves the purpose of the RMA and is not contrary to Part 2 and other provisions of the RMA.</li> <li>Will enable the social, economic and cultural wellbeing of the community.</li> <li>Will meet the reasonably foreseeable needs of future generations.</li> <li>Is the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.</li> </ul>
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Support	Retain as notified.	<ul style="list-style-type: none"> <li>Promotes sustainable management, achieves the purpose of the RMA and is not contrary to Part 2 and other provisions of the RMA.</li> <li>Will enable the social, economic and cultural wellbeing of the community.</li> <li>Will meet the reasonably foreseeable needs of future generations.</li> <li>Is the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.</li> </ul>
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for	Support	Retain as notified.	<ul style="list-style-type: none"> <li>Promotes sustainable management, achieves the purpose of the RMA and is not contrary to Part 2 and other provisions of the RMA.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		economic production			<ul style="list-style-type: none"> <li>• Will enable the social, economic and cultural wellbeing of the community.</li> <li>• Will meet the reasonably foreseeable needs of future generations.</li> <li>• Is the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.</li> </ul>
154	Land management for economic production	Policy suite 4.3 - Sufficient land is managed and protected for economic production	Amend	Insert a new Policy as follows: " <u>Recognise the benefits derived from mineral prospecting, exploration, extraction and processing, particularly their contribution towards social, cultural and economic wellbeing</u> ".	<ul style="list-style-type: none"> <li>• The PRPS does not contain appropriate or sufficient provisions that promote the responsible use of minerals, recognising they are fixed in location, and need to remain available for future generations.</li> <li>• A sustained supply of minerals and aggregate is essential for the continued development of the region and wider New Zealand. Locally sourced low cost minerals and aggregate reduce infrastructure costs and development projects, and is important to economic wellbeing.</li> <li>• This requires finding new sources to meet demand well in the future. This is consistent with the RMA S7(b) matter of "efficient use and development of physical and natural resources".</li> <li>• Under the RMA, economic wellbeing considerations are intertwined with the concept of sustainable management of natural and physical resources.</li> </ul>
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend Policy 4.3.6 as follows: "Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) Giving preference <u>where possible</u> , to avoiding their location in: [i. to v. unchanged]; and b) <del>Restricting</del> <u>Avoiding</u> the establishment of those activities in <u>or adjacent to</u> areas used for mineral and gas exploration, extraction and processing <u>or in areas containing or adjacent to regionally significant mineral resources</u> that may result in reverse sensitivity effects <u>or compromise future mineral extraction and processing activities</u> . c) <u>Identifying mineral deposits for future use and safeguarding the regionally significant ones from inappropriate land use, subdivision and development</u> . d) <u>Enabling industries that principally use the products of mineral extraction activities to co-locate in, or adjoining, land containing mineral extraction activities or mineral resources.</u> "	<ul style="list-style-type: none"> <li>• The policy does not give effect to the RMA. It will not enable the social, economic and cultural wellbeing of the community, and will not sustain the potential of the physical resource represented by the submitter's assets in the region for the future.</li> <li>• It is not adequate to protect and enable the submitter's operations in the region and does not have sufficient regard to the efficient use and development of the submitters' assets and of those resources which are dependent on, or benefit from, the submitters' assets and operations.</li> <li>• A sustained supply of minerals and aggregate is essential for the continued development of the region and wider New Zealand. Locally sourced low cost minerals and aggregate reduce infrastructure costs and development projects, and is important to economic wellbeing.</li> <li>• This requires finding new sources to meet demand well in the future. This is consistent with the RMA S7(b) matter of "efficient use and development of physical and natural resources".</li> <li>• Under the RMA, economic wellbeing considerations are intertwined with the concept of sustainable management of natural and physical resources.</li> <li>• The Policy is not the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.</li> </ul>
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Amend Policy as follows: "Minimise <u>significant</u> adverse effects from the exploration, extraction and processing of minerals, by: a) Giving preference to avoiding their location in: [i. to v. unchanged]; and <del>v. Areas subject to significant natural hazard risk;</del> [(b) to (e) unchanged] f) Reducing unavoidable adverse effects <u>where practical</u> by: i. Staging development for longer term activities <del>and</del> <u>or</u> ii. Progressively rehabilitating the site where	<ul style="list-style-type: none"> <li>• The policy does not give effect to the RMA. It will not enable the social, economic and cultural wellbeing of the community, and will not sustain the potential of the physical resource represented by the submitter's assets in the region for the future.</li> <li>• It is not adequate to protect and enable the submitter's operations in the region and does not have sufficient regard to the efficient use and development of the submitters' assets and of those resources which are dependent on, or benefit from, the submitters' assets and operations.</li> <li>• A sustained supply of minerals and aggregate is essential for the continued development of the region and wider New Zealand. Locally sourced low cost minerals and aggregate reduce infrastructure costs and development projects, and is important to economic wellbeing.</li> <li>• This requires finding new sources to meet demand well in the future.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				possible ; <u>or</u> <u>iii. Preparing management and mitigation plans.</u> g) Considering the use of offsetting, or compensatory measure for residual adverse effects ; <u>and</u> h) <del>Applying a precautionary approach to assessing the effects of the activity, where there is scientific uncertainty, and potentially significant or irreversible adverse effects.</del> "	This is consistent with the RMA S7(b) matter of "efficient use and development of physical and natural resources". <ul style="list-style-type: none"> <li>Under the RMA, economic wellbeing considerations are intertwined with the concept of sustainable management of natural and physical resources.</li> <li>The Policy is not the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend the policy as follows: "Enable offsetting of adverse effects on indigenous biodiversity values, <del>only</del> when: a) The activities causing those effects have a functional necessity to locate in significant or outstanding areas; <u>and/or</u> <u>aa) The activities causing those effects are regionally or nationally significant; and</u> etc."	<ul style="list-style-type: none"> <li>The policy does not give effect to the RMA. It will not enable the social, economic and cultural wellbeing of the community, and will not sustain the potential of the physical resource represented by the submitter's assets in the region for the future.</li> <li>It is not adequate to protect and enable the submitter's operations in the region and does not have sufficient regard to the efficient use and development of the submitters' assets and of those resources which are dependent on, or benefit from, the submitters' assets and operations.</li> <li>A sustained supply of minerals and aggregate is essential for the continued development of the region and wider New Zealand. Locally sourced low cost minerals and aggregate reduce infrastructure costs and development projects, and is important to economic wellbeing.</li> <li>This requires finding new sources to meet demand well in the future. This is consistent with the RMA S7(b) matter of "efficient use and development of physical and natural resources".</li> <li>Under the RMA, economic wellbeing considerations are intertwined with the concept of sustainable management of natural and physical resources.</li> <li>The Policy is not the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Amend (a) as follows: "a) The offset achieves no net loss and <u>where possible</u> , preferably a net gain in indigenous biodiversity values; and"	<ul style="list-style-type: none"> <li>The policy does not give effect to the RMA. It will not enable the social, economic and cultural wellbeing of the community, and will not sustain the potential of the physical resource represented by the submitter's assets in the region for the future.</li> <li>It is not adequate to protect and enable the submitter's operations in the region and does not have sufficient regard to the efficient use and development of the submitters' assets and of those resources which are dependent on, or benefit from, the submitters' assets and operations.</li> <li>A sustained supply of minerals and aggregate is essential for the continued development of the region and wider New Zealand. Locally sourced low cost minerals and aggregate reduce infrastructure costs and development projects, and is important to economic wellbeing.</li> <li>This requires finding new sources to meet demand well in the future. This is consistent with the RMA S7(b) matter of "efficient use and development of physical and natural resources".</li> <li>Under the RMA, economic wellbeing considerations are intertwined with the concept of sustainable management of natural and physical resources.</li> <li>The Policy is not the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.</li> </ul>
192	Method 4 - City and District Plans	Method 4 - City and District Plans	Amend	Amend to require Councils to: <ul style="list-style-type: none"> <li>Identify regionally significant mineral</li> </ul>	<ul style="list-style-type: none"> <li>The PRPS does not contain appropriate or sufficient provisions that promote the responsible use of minerals, recognising they are fixed in</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				resources and mineral extraction activities to be protected from reverse sensitivity effects; and • Apply buffers and setbacks to regionally significant mineral resources and mineral extraction activities to avoid reverse sensitivity effects.	location, and need to remain available for future generations. • A sustained supply of minerals and aggregate is essential for the continued development of the region and wider New Zealand. Locally sourced low cost minerals and aggregate reduce infrastructure costs and development projects, and is important to economic wellbeing. • This requires finding new sources to meet demand well in the future. This is consistent with the RMA S7(b) matter of "efficient use and development of physical and natural resources". • Under the RMA, economic wellbeing considerations are intertwined with the concept of sustainable management of natural and physical resources.
252	Other comments	Process	Not Applicable	The Council should undertake dispute resolution procedures prior to the hearings.	The issues underpinning this submission can be better resolved without the need to rely on substantial participation in the formal hearing process.
294	Objectives on use and enjoyment of natural and built environment	Need 4.3	Support	Retain the "need" statement associated to Objective 4.3 and the introduction to Objective 4.3 as notified.	• Promotes sustainable management, achieves the purpose of the RMA and is not contrary to Part 2 and other provisions of the RMA. • Will enable the social, economic and cultural wellbeing of the community. • Will meet the reasonably foreseeable needs of future generations. • Is the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.

### 93 Jolyon Manning JP

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Did not specify	The ORC should have a stand-alone quality soil monitor policy as a follow up of the earlier "Grow Otago" project.	• The advent of pivot style irrigation and the abandonment of hedgerows and shelterbelts has set back important elements of biodiversity. • Climate change is a fact of life.
80	Natural hazard risk	Policy suite 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Did not specify	No decision requested.	• It has been fifteen years since the big Clutha floods but the recent South Dunedin flooding reminds us of the continuing need for vigilance and the ORC has a special role here.

### 94 John Wilson Douglas

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Support	Overall the proposal is very good - now to be implemented.	DoC Tenure reports / Scientific reports provide good background and information resource.
15	Principles of Te Tiriti of Waitangi	Schedule 2 - Statutory acknowledgments areas	Amend	Include Kapuwai (Old Man Rock, Old Man Range).	Appears this reserve around the rock has been overlooked.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Amend	Add: "e) distinctive seasonal changes" under 2 (Sensory attributes).	No reason given.
178	Methods	Methods - general	Amend	Include "Water Conservation Orders" as a method to implement Policies 2.1.1 and 2.1.2 & achieve Objective 2.1.	Water conservation orders are very important legislation.
210	Method 8 - Education and Information	Method 8 - Education and Information	Amend	Amend methods to make mention of Heritage NZ reports / listings.	Identifies many heritage sites in Otago.

### 95 Queenstown Lakes District Council

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Whole Regional Policy Statement (general support)	Support	Support	PRPS addresses current planning issues in a clear and concise manner and will support the ongoing integration of local and regional decision making.
7	Chapter B1 - Kai Tahu values	Chapter B1 - general requests	Amend	Make greater reference to Iwi Management	• District councils' obligations covered under the Treaty and the RMA;



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Plans, instead of replicating.	repetition of such protocols within the RPS is unnecessary. • Iwi management plans exist and should be referenced in favour of duplicating their content in the RPS.
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Did not specify	<ul style="list-style-type: none"> <li>Clarify whether "Special Amenity Landscapes" apply to urban environments or heritage sites.</li> <li>Clarify whether this is suitably addressed by the policy framework.</li> </ul>	It is uncertain whether special amenity landscapes may also apply to urban environments or heritage sites with particular amenity values or how effectively this is addressed by the policy framework.
42	Highly valued natural resources - indigenous biodiversity	Policy 2.2.1 - Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna	Support	Support	Align well with the approach of the proposed District Plan.
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Support	Support	Align well with the approach of the proposed District Plan.
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Support	Support	<ul style="list-style-type: none"> <li>Align well with the approach of the proposed District Plan.</li> <li>Policy important in providing certainty to the community, in addition to improving the efficiency of regulatory processes.</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Support	Support.	<ul style="list-style-type: none"> <li>Align well with the approach of the proposed District Plan.</li> <li>Policy important in providing certainty to the community, in addition to improving the efficiency of regulatory processes.</li> <li>Provides the basis for more effective control of wilding pines, an issue particularly significant for Queenstown Lakes District.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Support	Support 2.2.6(e).	Provides the basis for more effective control of wilding pines, an issue particularly significant for Queenstown Lakes District.
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Support	Support 2.2.13(d).	Provides the basis for more effective control of wilding pines, an issue particularly significant for Queenstown Lakes District.
80	Natural hazard risk	Policy suite 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Greater flexibility within the policy approach to enable consideration of hazards by means appropriate for the local context.	The proposed policy approach does not recognise QLDC's unique circumstances and the need to enable infill development to meet predicted levels of growth.
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Clarify meaning of the concept of community "tolerance" to natural hazards.	The concept of tolerance is not discussed or defined in the PRPS.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	<ul style="list-style-type: none"> <li>Widen the scope to enable consideration of the extent to which risk can be mitigated or reduced to tolerable levels.</li> <li>Include reference to "avoiding or reducing natural hazard risk".</li> <li>Include encouragement of design that facilitates an acceptable reduction in natural hazard risk.</li> </ul>	<ul style="list-style-type: none"> <li>The complete "avoidance" of natural hazard risks may not be appropriate of achievable, as QLDC's objectives for reducing urban sprawl and improving the efficient use of existing urban areas will necessitate further infill within existing urban areas.</li> <li>Social and economic consequences of "avoidance" strategies are significant on a local, regional, and national levels, and include: <ul style="list-style-type: none"> <li>Inability to meet housing and accommodation demands;</li> <li>Increased overcrowding and social health concerns;</li> <li>Compromised urban growth boundaries and need for new settlements at increasing distance from urban centres;</li> <li>Viability of town centres and public transport routes compromised by lack of density;</li> <li>Economic and tourism decline.</li> </ul> </li> <li>"Significant" is not defined and there is no explicit option under these policies to enable development to proceed where innovative design or mitigation is able to reduce risk to an acceptable level.</li> <li>Proposed amendment consistent with risk-based planning approach reflected by GNS's current research and AS/NZS ISO 31000:2009, and retain the overall goal of risk reduction, whilst enabling flexibility to allow for site specific analysis.</li> </ul>
92	Objectives on resilience, health	Objective 3.3 - Otago's	Amend	Consider including recognition that extreme	Objective does not recognise the increasing frequency of extreme

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	and safety	communities are prepared for and able to adapt to the effects of climate change		weather events are becoming more common, increasing demands on infrastructure networks.	events associated with climate change.
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Strengthen with regard to the protection of outstanding natural features and landscapes.	Given the extent of outstanding natural features and landscapes within Queenstown Lakes, include greater emphasis on consideration of alternatives and location within outstanding natural features, landscapes and seascapes should only occur where there are no feasible alternatives.
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Support	Support	Support the encouragement of small scale renewable energy generation in minimising reliance on fossil fuels and improving the resilience of local energy supplies, which QLDC also seeks to do via a more enabling regulatory framework.
114	Energy	Policy 3.6.6 - Reducing long term demand for fossil fuels	Amend	Policy address the need to consider public transport requirements during site design and transport planning phases.	<ul style="list-style-type: none"> <li>Public transport networks and facilities should be considered during the planning stages of development as integral component of transport system.</li> <li>Retrofitting systems into developed urban areas can be challenging and more costly.</li> </ul>
116	Urban design	Policy suite 3.7 - Urban areas are well designed, sustainable and reflect local character	Support	Support	<ul style="list-style-type: none"> <li>The approach for managing urban growth is generally consistent with QLDC's direction, and the principles for urban growth and design align well with the QLDC Proposed District Plan.</li> <li>In particular policies 3.7.2 and 3.7.3 provide the framework for sustainable building forms which are encouraged via High and Medium Density residential provisions in the Proposed District Plan.</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	<ul style="list-style-type: none"> <li>Widen the scope to enable consideration of the extent to which risk can be mitigated or reduced to tolerable levels.</li> <li>Amend 3.7.1(c) to include reference to "avoiding or reducing natural hazard risk", and encouragement of design that facilitates an acceptable reduction in natural hazard risk.</li> </ul>	<ul style="list-style-type: none"> <li>The complete "avoidance" of natural hazard risks may not be appropriate or achievable, as QLDC's objectives for reducing urban sprawl and improving the efficient use of existing urban areas will necessitate further infill within existing urban areas.</li> <li>Social and economic consequences of "avoidance" strategies are significant on a local, regional, and national levels, and include: <ul style="list-style-type: none"> <li>Inability to meet housing and accommodation demands;</li> <li>Increased overcrowding and social health concerns;</li> <li>Compromised urban growth boundaries and need for new settlements at increasing distance from urban centres;</li> <li>Viability of town centres and public transport routes compromised by lack of density;</li> <li>Economic and tourism decline.</li> </ul> </li> <li>"Significant" is not defined and there is no explicit option under these policies to enable development to proceed where innovative design or mitigation is able to reduce risk to an acceptable level.</li> <li>Proposed amendment consistent with risk-based planning approach reflected by GNS's current research and AS/NZS ISO 31000:2009, and retain the overall goal of risk reduction, whilst enabling flexibility to allow for site specific analysis.</li> </ul>
118	Urban design	Schedule 6 - Urban form and design	Amend	<ul style="list-style-type: none"> <li>Recognise more specifically: <ul style="list-style-type: none"> <li>2(h) - connections with blue networks as reflected by Objective 3.7;</li> <li>3(h) - cycling connectivity;</li> <li>4(b) - stronger emphasis on heritage, both adverse and positive effects of proposals on heritage features.</li> </ul> </li> <li>Clarify meaning of 3(a).</li> <li>Change "especially" to "including" in 3(a).</li> </ul>	<ul style="list-style-type: none"> <li>"Disadvantaged" not defined. Could extend into social planning, which is outside the scope of the regional council's functions under the RMA.</li> <li>Wording of 3(a) suggests the disadvantaged should be given priority within an urban context.</li> </ul>
123	Urban growth	Policy suite 3.8 - Urban growth is well designed and integrates effectively with adjoining urban	Support	<ul style="list-style-type: none"> <li>The definition and function of urban growth boundaries within the Proposed RPS do not refer to staging or sequencing, or a specific time</li> </ul>	<ul style="list-style-type: none"> <li>The approach for managing urban growth is generally consistent with QLDC's direction, and the principles for urban growth and design align well with the QLDC Proposed District Plan.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		and rural environments		period for growth. • Provide the framework for the use of Urban Growth Boundaries as a tool, but limit their mapping to the district plan without replication in the RPS.	<ul style="list-style-type: none"> <li>• The staging and sequencing of land release within Urban Growth Boundaries is problematic and may have unintended economic consequences. QLDC has intentionally avoided interfering with market control over land release in seeking to address housing affordability and improve the ease of housing development.</li> <li>• The function of Urban Growth Boundaries not only growth related. May also be used to protect the cohesion and heritage / character of urban centres. In such cases they may not necessarily cater for 10 years of growth.</li> <li>• Reference to providing 10 years of growth may result in the perception that increased density is not necessary because there is sufficient supply for 10 years.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Include specific locations subject to management control or linkage to relevant external documents.	The RPS does not provide detail of the specific locations to be managed or "air pollution sensitive areas" where the use of low or no-emission heating may be required.
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<ul style="list-style-type: none"> <li>• Consider appropriateness of avoidance in all economic circumstances.</li> <li>• Greater scope enabled to determine avoidance consistent with potential economic significance of the loss of productive capacity; and reference to permanent loss of productive capacity.</li> </ul>	<ul style="list-style-type: none"> <li>• If avoidance strategies are sought, then further definition of the activities encompassed by primary production should be provided.</li> <li>• An activity may affect the potential use of land for productive use, but this productive use may not be of strategic or economic importance - and this fact changes over time.</li> <li>• Recognise loss of productive capacity may be temporary.</li> </ul>
148	Historic heritage	Policy suite 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	<ul style="list-style-type: none"> <li>• Include policies and methods to guide historic heritage assessments.</li> <li>• Include vegetation within the scope of the policies relating to historic heritage.</li> </ul>	<ul style="list-style-type: none"> <li>• Promoting accidental discovery protocols (Method 4.1.9(a)) should not be a substitute for correctly assessing the effects of development on historic heritage.</li> <li>• The items identifying historic heritage are specific to built features, and do not recognise vegetation such as protected trees.</li> </ul>
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	Include reference to "town centres".	The term "central business district" does not appropriately reflect the nature of urban centres within Queenstown Lakes.
165	Making the most of available resources	Policy 4.4.3 - Encouraging environmental enhancement	Amend	Add water quantity and quality as matters for consideration.	Could encourage activities which contribute to, or minimise effects on, the recharging of groundwater, potable water tables and aquifers.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	<ul style="list-style-type: none"> <li>• Include policy to address the potential known or feasible risks of mineral exploration, particularly fracking.</li> <li>• Give scope for the offsetting for water quality / quantity effects.</li> </ul>	<ul style="list-style-type: none"> <li>• Policy may not be strong enough to consider potential effects of fracking (water quality and quantity, earthquake risk, soil contamination).</li> <li>• Subsequent policies do not consider potential requirement for offsetting due to impacts on water.</li> </ul>
177	Roles and responsibilities	Roles and responsibilities	Amend	Clarify intended roles and responsibilities for historic heritage.	The document does not make it clear on who is responsible for identifying historic heritage.
177	Roles and responsibilities	Roles and responsibilities	Amend	Clarify the intended roles and responsibilities of District and Regional Councils in addressing the concept of community tolerance to risks.	Support territorial authorities being provided with responsibility to determine, in conjunction with the community, their tolerance of natural hazard risk and the appropriate tools to manage that risk.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Link Method 4.1.9 to other policies more specifically related to heritage.	Method 4.1.9 is currently linked to Policy 4.3.2; it is likely to be relevant to other policies more specifically related to heritage.
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	That Method 6.1.2 d) state "may" rather than "will".	<ul style="list-style-type: none"> <li>• The identification of Special Amenity Landscapes should be at the discretion of the territorial authority, where necessary to give effect to RMA S7(c).</li> <li>• Clarify whether this term would also apply to urban environments or heritage sites with particular amenity values, and whether this is suitably addressed in the policy framework.</li> </ul>
200	Method 6 - Research, Monitoring and Reporting	Method 6.3 - State of Environment Reporting	Amend	Include assessment of "ecosystem services" within the Proposed RPS and State of the Environment reporting.	Will provide the basis for further investigation of the effects of development on ecosystem services.
200	Method 6 - Research, Monitoring and Reporting	Method 6.3 - State of Environment Reporting	Amend	State "may" rather than "will".	State of the Environment reporting by district councils is not required with the LGA & RMA. Councils' role with regard to environmental

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					monitoring is best delivered by the existing responsibilities under these Acts.
201	Method 6 - Research, Monitoring and Reporting	Method 6.4 - RMA plan effectiveness reporting	Amend	State "may" rather than "will".	The implementation of RMA S35 is best determined by the territorial authority, with flexibility retained to adapt to local issues and needs.
236	Anticipated Environmental Results	AER 3.1 - The location and design of new developments and uses reduce community exposure to the adverse effects of shock events and processes.	Amend	Rephrase to reflect the goal of improving community resilience and reducing liability associated with climate change.	<ul style="list-style-type: none"> <li>Climate change is undefined and wide in scope and application, and its effects may include extreme rainfall or snowfall event.</li> <li>It may not be feasible that no financial assistance would be required after an extreme event.</li> <li>"Withstand" is a significantly high bar to achieve given the uncertainty and changing nature of climate change.</li> <li>The term "new development" is unclear and could apply to a wide range of "new" buildings or developments.</li> </ul>
249	Glossaries	Glossary	Amend	Define "primary production".	<ul style="list-style-type: none"> <li>If avoidance strategies are sought (in Policy 3.8.3), then further definition of the activities encompassed by primary production should be provided.</li> </ul>
253	Other comments	Structure of the document & useability - general	Amend	Reduce repetition of objectives and policies to create a more streamlined document.	Objectives and policies are repeated in full several times throughout the document.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Remove issue statements.	<ul style="list-style-type: none"> <li>Unnecessary in RPS and more relevant in s32 analysis.</li> <li>Will assist towards a more streamlined document.</li> </ul>
265	Chapter B2 - High quality natural resources	Outcome 2 and introduction	Amend	Introduction to Chapter 2: Greater emphasis on natural values and ecosystem services.	Refers to the intrinsic values of the environment in context of people's values. Greater recognition could be placed on inherent natural values of flora and fauna, and the ecosystem services they provide.
278	Objectives on resilience, health and safety	Need 3.6	Amend	Introduction to Chapter 3 (p.43) - Objective 3.6: consider greater emphasis on the importance of local energy production.	Support for local energy production and conservation will reduce reliance on fossil fuels and improve resilience.

### 96 Erik Olssen

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Oppose	Sustainable economic growth should be the central issue of the Proposed RPS	<ul style="list-style-type: none"> <li>The absence of any coherent plan for enhancing the economic wellbeing of our people and region is a glaring omission and doubtless contributes to a widespread perception outside the region we are hostile to business.</li> </ul>
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Oppose	Progressive thinking on earthquake and heritage buildings needed to address these issues given the centrality assigned heritage in the Proposed RPS.	<ul style="list-style-type: none"> <li>Heritage is of vital and on-going importance and I favour access to natural and historic amenities.</li> <li>The plan does not address the Government's post-earthquake policy re-strengthening heritage buildings or the growing portion of church buildings at risk due to dwindling congregations.</li> </ul>

### 97 Transpower New Zealand Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
5	Overall approach	Introduction - The Treaty Partner	Amend	<p>In "Expression of Te Tiriti o Waitangi":</p> <ul style="list-style-type: none"> <li>Remove the following text from the first bullet point: "Recognising the rights and interests of Kai Tahu to be involved in natural and resource management processes in Otago including decision-making processes and implementation."</li> <li>Include the following text to bullet point 3: "Protecting traditional food gathering sites from any use or development which may threaten the values of these areas, to the extent practicable."</li> </ul>	<ul style="list-style-type: none"> <li>The RPS elevates Kai Tahu above all other parties by allowing them a role in the decision making process, which is inconsistent with the RMA.</li> <li>Traditional food gathering sites should be protected from use or development, but Council must recognise that some developments/use (e.g. nationally or regionally significant infrastructure) have to be located in specific areas. Furthermore it should depend on the significance of the values associated with the site.</li> </ul>
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	Amend the text as follows: "Ensure that local authorities exercise their functions and powers to: a) Accord Kai Tahu a status distinct from that of	Supports the principle that Kai Tahu values, rights and interests are considered in the resource management process but does not consider that Kai Tahu should be elevated above all other parties, as not consistent with Part 2 RMA, in particular section 6-8.

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				interest groups and members of the public, consistent with their position as a Treaty partner; and b) Involve Kai Tahu in resource management decision making processes and implementation; and c) Take into account Kai Tahu views <u>values</u> in resource management ..."	
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects on those values and sites, as detailed in Schedule 3, <u>to the extent practicable</u> ; and..."	<ul style="list-style-type: none"> <li>• Supports this policy but notes that the word "avoid" should be used carefully due to the recent Supreme Court decision on the King Salmon case - "avoid" means "not allowing" or "preventing the occurrence of".</li> <li>• Some developments need to be located in particular areas. This should be acknowledged.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend p) as follows: "p) <u>maintain the ability Enable the reasonable operational, maintenance and minor upgrade requirements</u> of existing infrastructure <u>to operate within their design parameters.</u> "	<ul style="list-style-type: none"> <li>• Supports the intent of this policy, particularly p).</li> <li>• It should be amended to give effect to Policy 5 of the National Policy Statement on Electricity Transmission (NPSET) which states that "decision makers must enable the reasonable operational, maintenance and minor upgrade requirements of established electricity transmission assets".</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Make similar amendments to the following changes suggested for Policy 2.2.4: "Protect, enhance and restore the values of outstanding natural features, landscapes and seascapes, by: a) avoiding <u>or where this is not practicable, remedying or mitigating</u> adverse effects...; and b) <u>Avoiding, remedying or mitigating other adverse effects on other values; and; ...</u> "	<ul style="list-style-type: none"> <li>• The word "avoid" should be carefully used due to the recent Supreme Court decision on the King Salmon Case, which determined the word avoid means "Not allowing" or "preventing the occurrence of".</li> <li>• Whilst the RPS acknowledges that some developments need to be located in particular areas, the underlying policies do not acknowledge this.</li> <li>• Such a prohibitive approach would not give effect to the NPSET.</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Protect, enhance and restore the values of outstanding natural features, landscapes and seascapes, by: a) avoiding <u>or where this is not practicable, remedying or mitigating</u> adverse effects...; and b) <u>Avoiding, remedying or mitigating other adverse effects on other values; and; ...</u> "	<ul style="list-style-type: none"> <li>• The word "avoid" should be carefully used due to the recent Supreme Court decision on the King Salmon Case, which determined the word avoid means "Not allowing" or "preventing the occurrence of".</li> <li>• Whilst the RPS acknowledges that some developments need to be located in particular areas, the underlying policies do not acknowledge this.</li> <li>• Such a prohibitive approach would not give effect to the NPSET.</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Oppose	<ul style="list-style-type: none"> <li>• Remove any reference to "special amenity landscapes" and "highly valued natural features" from the entire RPS including policies 2.2.5 and 2.2.6 and any associated methods.</li> <li>• Alternatively, provide maps which show where these areas are and the extent of them.</li> </ul>	<ul style="list-style-type: none"> <li>• "Special amenity landscapes and "highly valued natural features" are not defined in the RMA. There is no reference to how these terms sit within section 6 of the RMA.</li> <li>• Despite the RPS glossary definition, it is not currently transparent what kind of areas would be affected and where they may be located. If these terms are to be incorporated, this needs to be clarified, so Transpower can assess the areas in relation to the existing and future National Grid assets.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Oppose	<ul style="list-style-type: none"> <li>• Remove any reference to "special amenity landscapes" and "highly valued natural features" from the entire RPS including policies 2.2.5 and 2.2.6 and any associated methods.</li> <li>• Alternatively, provide maps which show where these areas are and the extent of them.</li> </ul>	<ul style="list-style-type: none"> <li>• "Special amenity landscapes and "highly valued natural features" are not defined in the RMA. There is no reference to how these terms sit within section 6 of the RMA.</li> <li>• Despite the RPS glossary definition, it is not currently transparent what kind of areas would be affected and where they may be located. If these terms are to be incorporated, this needs to be clarified, so Transpower can assess the areas in relation to the existing and future National Grid assets.</li> </ul>

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48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Make similar amendments to the following changes suggested for Policy 2.2.4: "Protect, enhance and restore the values of outstanding natural features, landscapes and seascapes, by: a) avoiding <del>,or where this is not practicable, remedying or mitigating</del> adverse effects...; and b) <del>Avoiding, remedying or mitigating other adverse effects on other values; and;</del> ..."	<ul style="list-style-type: none"> <li>The word "avoid" should be carefully used due to the recent Supreme Court decision on the King Salmon Case, which determined the word avoid means "Not allowing" or "preventing the occurrence of".</li> <li>Whilst the RPS acknowledges that some developments need to be located in particular areas, the underlying policies do not acknowledge this.</li> <li>Such a prohibitive approach would not give effect to the NPSET.</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Make similar amendments to the following changes suggested for Policy 2.2.4: "Protect, enhance and restore the values of outstanding natural features, landscapes and seascapes, by: a) avoiding <del>,or where this is not practicable, remedying or mitigating</del> adverse effects...; and b) <del>Avoiding, remedying or mitigating other adverse effects on other values; and;</del> ..."	<ul style="list-style-type: none"> <li>The word "avoid" should be carefully used due to the recent Supreme Court decision on the King Salmon Case, which determined the word avoid means "Not allowing" or "preventing the occurrence of".</li> <li>Whilst the RPS acknowledges that some developments need to be located in particular areas, the underlying policies do not acknowledge this.</li> <li>Such a prohibitive approach would not give effect to the NPSET.</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Make similar amendments to the following changes suggested for Policy 2.2.4: "Protect, enhance and restore the values of outstanding natural features, landscapes and seascapes, by: a) avoiding <del>,or where this is not practicable, remedying or mitigating</del> adverse effects...; and b) <del>Avoiding, remedying or mitigating other adverse effects on other values; and;</del> ..."	<ul style="list-style-type: none"> <li>The word "avoid" should be carefully used due to the recent Supreme Court decision on the King Salmon Case, which determined the word avoid means "Not allowing" or "preventing the occurrence of".</li> <li>Whilst the RPS acknowledges that some developments need to be located in particular areas, the underlying policies do not acknowledge this.</li> <li>Such a prohibitive approach would not give effect to the NPSET.</li> </ul>
65	Chapter B3 - Resilience, health and safety	Chapter B3 - general requests	Amend	<p>Add a new objective which reads: <u>"To recognise and provide for the ongoing operation, maintenance and development of the National Grid within Otago as infrastructure of regional and national significance."</u></p> <p>Explanation: <u>"The National Grid is infrastructure which has critical importance at a local, regional and national level. This infrastructure is recognised as nationally significant and as such the National Policy Statement on Electricity Transmission underpins its operation, maintenance, development and upgrade. It is important that land use and subdivision is managed effectively and in line with the NPSET to ensure that the operation, maintenance, development and upgrade of the National Grid is not compromised. This approach also ensures that a secure and reliable electricity supply is provided not only for the Otago region, but also on a national scale. In turn, appropriate management of activities in proximity to the National Grid will assist in minimising the adverse effects of the National Grid on communities, as far as practicable."</u></p>	It would be beneficial if there was an additional objective specifically for electricity transmission activities (the National Grid) to recognise and provide for the benefits of the National Grid as well as the effective operation, maintenance, upgrading and development of the National Grid in Otago.

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96	Objectives on resilience, health and safety	Objective 3.4 - Good quality infrastructure and services meet community needs	Amend	Retain the objective as drafted.	Strongly supports the objective, as recognises that infrastructure, such as the National Grid, is essential for Otago's economy, and the wellbeing and health and safety of its communities.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend the text of Policy 3.4.1 as follows: "Achieve the strategic integration of infrastructure with land use, by: a) Recognising the <u>functional, technical, operational and locational</u> needs of infrastructure of regional or national importance; b) <u>Achieving a pattern, form and design of land use that does not adversely affect the efficient operation, use and upgrading of infrastructure of regional or national importance;</u> ... c) <u>Managing urban growth and development:</u> i) <u>Within areas that have sufficient infrastructure capacity and provision;</u> or ii) <u>Where infrastructure services can be upgraded, developed or extended efficiently and effectively; and</u> iii) <u>By notifying the owners and operators of infrastructure of consent applications that may adversely affect such infrastructure."</u>	<ul style="list-style-type: none"> <li>• Supports this policy's purpose to integrate infrastructure with land use, therefore giving effect to Policy 11 of the NPSET.</li> <li>• Amendment sought to ensure full effect is given to the NPSET in particular recognising the functional, technical operational and locational needs of infrastructure, such as the National Grid (Policies 2, 3 and 4 of the NPSET).</li> <li>• Para iii) amendment is consistent with Policy 14 of the NPSET.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend as follows: "Manage infrastructure activities, to: ... b) Reduce adverse effects of those activities, <u>where practicable</u> including cumulative... ... e) Protect <u>existing and future</u> infrastructure corridors <u>by ensuring that development within these corridors does not generate adverse effects on the infrastructure, including the ability of that infrastructure to be accessed, operated, maintained and/or upgraded; for infrastructure needs, now and for the future;</u> ... g) Protect the <u>functioning functional and operational requirements ..."</u>	<ul style="list-style-type: none"> <li>• Generally supports, but small amendments to the policy would ensure consistent language with the NPSET.</li> <li>• Strongly supports g) as this ensures lifeline utilities such as the National Grid are protected.</li> </ul>
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Support	Retain policy as drafted.	Supports this policy as it recognises the importance of lifeline utilities, such as the National Grid, during and after natural hazard events.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	Amend as follows: "Protect the functioning of hazard mitigation measures, lifeline utilities, essential or emergency services, including by: a) Restricting the establishment of <u>any new these</u> activities... b) Avoiding significant adverse effects on <u>the operation, maintenance and upgrading these</u> measures... c) Avoiding, remedying or mitigating other adverse effects on <u>the operation, maintenance and upgrading these</u> of utilities..."	Supports the policy with minor wording changes.
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance	Support	Retain objective and explanation as drafted.	• Supports as it recognises the regionally or nationally significant infrastructure is important and contributes to the economic and social

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		is managed in a sustainable way			<p>wellbeing of the nation.</p> <ul style="list-style-type: none"> <li>Specifically supports examples used such as "electricity generation and transmission".</li> <li>Consistent with the NPSET.</li> </ul>
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	<p>Amend as follows:</p> <p>"Recognise the national and regional significance of the following infrastructure <u>by facilitating the operation, maintenance and upgrade of existing facilities and the establishment of new resources to meet the needs of present and future generations:</u></p> <p>...</p> <p>b) <u>The National Grid Electricity transmission infrastructure;</u> and</p> <p>..."</p>	<ul style="list-style-type: none"> <li>Unclear what "electricity transmission infrastructure" includes (national grid? Distribution network, generation companies' transmission lines?).</li> <li>To be consistent with the NPSET, the transmission network should be specifically provided for, and not confused with other regionally significant infrastructure (i.e. the distribution network).</li> <li>The policy should also facilitate the operation, maintenance and upgrade of the infrastructure, and the establishment of new infrastructure to be consistent with Policy 1 of the NPSET.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	<p>Amend as follows:</p> <p><u>"In managing the effects</u> <del>Minimise</del> adverse effects from infrastructure that has national or regional significance, <u>territorial authorities shall take into account the following by:</u></p> <p>a) <u>The constraints imposed by the technical, operational and locational requirements of the infrastructure when considering</u> <del>Giving</del> preference to avoiding their location in:</p> <p>...</p> <p>b) <u>Where it is not possible to avoid locating in the areas listed in a) above, having regard to the extent to which</u> <del>avoiding</del> significant adverse effects <u>have been avoided, remedied or mitigated, including reducing adverse effects;</u> <del>on those values that contribute to the significant or outstanding nature of those areas;</del> and;</p> <p>c) <u>Avoiding, remedying or mitigating other adverse effects on values;</u> and</p> <p>...</p> <p>e) <u>Considering the use of offsetting, or other compensatory measures, for residual adverse effects on indigenous biodiversity.</u></p> <p>e) <u>The benefits of the infrastructure;</u> and</p> <p>f) <u>If infrastructure is proposed across regional or district boundaries, apply a consistent and coordinated approach to the provisions."</u></p>	<ul style="list-style-type: none"> <li>Decision makers should be directed to consider benefits of infrastructure, as well as adverse effects, to be consistent with the NPSET.</li> <li>Also seeks consistency with King Salmon case regarding use of "Avoid".</li> <li>Policy 8 of the NPSET requires that "planning and development of the transmission system should seek to avoid adverse effects" on these areas, rather than outright avoidance.</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<p>Amend as follows:</p> <p>"Protect infrastructure of national or regional significance, by:...</p> <p>g) <u>Restricting To the extent reasonably possible, avoiding</u> the establishment of <u>any new</u> activities that may result in reverse sensitivity effects; and</p> <p>h) <u>Avoiding significant adverse effects on the operation, maintenance and upgrading functional needs</u> of such infrastructure; and</p> <p>i) <u>Avoiding, remedying or mitigating other adverse effects on the operation, maintenance and upgrading functional needs</u> of such infrastructure, <u>including the ability to access that</u></p>	<ul style="list-style-type: none"> <li>Strongly supports this policy as it provides protection for regionally and nationally significant infrastructure, however the terminology is not consistent with the NPSET.</li> <li>Amendments to give clear guidance to decision-makers.</li> </ul>



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				<p>infrastructure; and</p> <p>...</p> <p>k) <u>Identifying and protecting existing and future infrastructure corridors by ensuring that development within these corridors does not generate adverse effects on the infrastructure; for infrastructure needs, now and for the future and;</u></p> <p>l) <u>Ensuring that there is no change to existing activities that increases their incompatibility with existing infrastructure; and</u></p> <p>m) <u>Notifying the owners and operators of infrastructure of consent applications that may adversely affect such infrastructure."</u></p>	
107	Objectives on resilience, health and safety	Objective 3.6 - Energy supplies to Otago's communities are secure and sustainable	Support	Retain objective as drafted.	Supports the intent of this objective as it recognises that the social and economic well being as well as health and safety of Otago's people is dependent on a reliable and secure supply of energy.
108	Energy	Policy suite 3.6 - Energy supplies to Otago's communities are secure and sustainable	Amend	<p>Insert a new policy as follows:</p> <p><u>"Protect the National Grid by:</u></p> <p>a) <u>Avoiding significant adverse effects, including reverse sensitivity effects, on the National Grid; and</u></p> <p>b) <u>Avoiding any other adverse effects on the National Grid, or remedying or mitigating them appropriately where avoidance is not possible; and</u></p> <p>c) <u>Ensuring that existing National Grid corridors are identified [and] protected in all resource management decision making; and</u></p> <p>d) <u>Ensuring that any new activities that would adversely affect the operation, maintenance or upgrading of the National Grid are not located near existing infrastructure associated with the National Grid; and</u></p> <p>e) <u>Ensuring that there is no change to existing activities that increases their incompatibility with existing National Grid infrastructure; and</u></p> <p>f) <u>Notifying the owners and operators of infrastructure of consent applications that may adversely affect National Grid infrastructure."</u></p>	<ul style="list-style-type: none"> <li>• Policy 3.6.5 only protects the local electricity distribution network with no protection for the National Grid - nationally significant infrastructure that Council is required to provide protection for through the NPSET.</li> <li>• The RPS, as currently worded, appears to be confused around the various parts of the electricity system, from generation and transmission right through to distribution. The RPS needs to be clear on when provisions are referring to both the electricity generation and transmission networks, or only one of the networks, and similarly where it is referring to the distribution network.</li> </ul>
112	Energy	Policy 3.6.4 - Enabling more efficient transport of electricity	Amend	<p>Amend as follows:</p> <p>"Enable electricity and distribution infrastructure activities that:</p> <p>a) maintain or improve the security <u>and reliability</u> of supply of electricity; or</p> <p>b) Enhance the <u>efficiency safe, efficient and effective development, operation and maintenance</u> of <del>transporting</del> electricity infrastructure; and</p> <p>..."</p>	<ul style="list-style-type: none"> <li>• Supports the intent, but not clear on the desired outcome or how it is to be achieved. Not clear how electricity transmission activities could be undertaken more efficiently, or what this would encompass.</li> <li>• "Transporting electricity" is inconsistent with the terminology used in the NPSET.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	<p>Amend as follows:</p> <p>"Manage urban growth and creation of new urban land in a strategic and co-ordinated way, by:</p> <p>...</p> <p>b) co-ordinating urban growth and extension of</p>	<ul style="list-style-type: none"> <li>• Supports this policy as it recognises that urban growth and creation of new urban land should occur in a strategic and co-ordinated way.</li> <li>• The policy should be amended to give stronger direction to decision-makers to ensure that the rate, location and form of development is integrated with the provision of local and strategic infrastructure, such as transmission corridors. To do this, consultation should be</li> </ul>

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				urban areas <u>the provision and location of</u> with relevant infrastructure development programmes, to i) ... ii) ... iii) <u>Ensure that the rate, location and form of development is integrated into the provision and location of strategic infrastructure</u> c) Identifying future growth areas that: i) <u>Do not adversely affect the efficient operation, use and upgrading of infrastructure of regional or national importance;</u> ii) ..."	undertaken with the infrastructure providers (such as Transpower) when developing structure plans, urban growth strategies, plan changes and reviews. This is consistent with Policy 14 of the NPSET.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Add an additional method which states: " <u>District plans shall include objectives, policies and methods (including rules) to:</u> <u>a) recognise transmission corridors within their district;</u> <u>b) identify transmission lines on planning maps; and</u> <u>c) to provide controls on subdivision and land use, as necessary to ensure that the operation, maintenance, upgrading and development of transmission infrastructure is not compromised as a result of the adverse effects of incompatible land uses (including structures)"</u>	Transpower notes there is a method that directs territorial authorities to identify corridors for regionally and nationally significant infrastructure, specifically the National Grid. Direction also needs to be given to direct Territorial Authorities identify the National Grid transmission lines on the planning maps which gives effect to Policy 12 of the NPSET.
249	Glossaries	Glossary	Amend	Insert a preamble to the glossary as follows: " <u>If a word or phrase is not defined then the meaning should be taken to be the same as found in section 2 of the Resource Management Act, the National Policy Statement on Electricity Transmission, and the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009.</u> "	No reason given.
249	Glossaries	Glossary	Amend	Amend Infrastructure definition as follows: "d) Facilities for the generation <u>or transmission</u> of electricity <u>such as substations</u> , lines used or intended to be used to <del>convey</del> <u>transmit or distribute</u> electricity and support structures for lines used or intended to be used to <del>convey</del> <u>transmit or convey</u> electricity, excluding facilities, lines and support structures..."	Supports this definition but considers the terminology regarding electricity (point d) needs altering as it does not appear to cover substations as currently worded.
249	Glossaries	Glossary	Amend	Retain definition as drafted but allow for further discussion on the scope of this definition and whether it could be amended to be consistent with other definitions used around the country.	<ul style="list-style-type: none"> <li>• Supports Council referring to the meaning of lifeline utilities used in the Civil Defence Emergency Management Act 2002 (CDEMA) as this definition includes Transpower.</li> <li>• Given the very broad definition used in the CDEMA, the definition could be amended to be more specific</li> </ul>
249	Glossaries	Glossary	Amend	Add new definition: " <u>National Grid: means the same as in the National Policy Statement on Electricity Transmission 2009, being the assets used or owned by Transpower New Zealand Limited.</u> "	No reason given.
249	Glossaries	Glossary	Amend	Alter the definition of Reverse Sensitivity to read:	<ul style="list-style-type: none"> <li>• The term as currently worded is confusing and does not achieve the purpose of protecting existing activities, such as the National Grid,</li> </ul>

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				<u>"is the legal vulnerability of an established activity to complaint from a new land use. It arises when an established use is causing adverse environmental impact to nearby land, and a new, benign activity is proposed for the land. The "sensitivity" is this: if the new use is permitted, the established use may be required to restrict its operations or mitigate its effects so as not to adversely affect the new activity."</u>	from adverse effects associated with the introduction of new activities. <ul style="list-style-type: none"> <li>• The definition should be replaced with the definition that is derived from case law (Gateway Funeral Services v Whakatane DC EnvC Wellington W005/08, 5 February 2008).</li> </ul>
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Appropriate recognition of the NPSET in the hierarchy of RMA documents and the role it plays in establishing national policy.	<ul style="list-style-type: none"> <li>• The PRPS makes no mention of the NPSET or the NESETA.</li> <li>• These documents should be mentioned as they sit higher in the statutory document hierarchy and directly influence content of the RPS and the outcomes it seeks to achieve.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Not Applicable	Make such further, alternative, or consequential relief as may be necessary to fully give effect to the submission.	No reason given.
285	Objectives on resilience, health and safety	Introduction to Objective 3.4	Amend	Amend the second paragraph of the introduction to Objective 3.4 (p. 56) as follows: "Local authorities have a role to play, to ensure that the <u>current and future local, and regional and national</u> infrastructure needs are being met."	Needs to include national infrastructure, as the Otago region contains significant parts of the National Grid, used to transmit electricity around the region as well as electricity generation assets for the entire country which require a connection to the National Grid for the transmission of this electricity.
286	Objectives on resilience, health and safety	Introduction to Objective 3.5	Support	Retain introduction to Objective 3.5 as drafted.	<ul style="list-style-type: none"> <li>• Supports as it recognises the regionally or nationally significant infrastructure is important and contributes to the economic and social wellbeing of the nation.</li> <li>• Specifically supports examples used such as "electricity generation and transmission".</li> <li>• Consistent with the NPSET.</li> </ul>
289	Objectives on resilience, health and safety	Introduction to Objective 3.8	Amend	Include an explanatory text under Objective 3.8 (p. 67) as follows: " <u>Well planned urban growth and land use will also ensure that adverse effects on the operation, maintenance, upgrading and long-term development of regionally and nationally significant infrastructure is avoided.</u> "	Supports this objective as it recognises that concentrating activities in urban areas enables community infrastructure and supports social infrastructure. However, seek amendment to ensure that land use and urban growth avoids adverse effects on the operation, maintenance, upgrading and long-term development of regionally and nationally significant infrastructure such as the National Grid.

### 98 Forest and Bird NZ

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24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	<ul style="list-style-type: none"> <li>• Re word to read: "The values and life supporting capacity of Otago's natural and physical resources are recognised, maintained and enhanced."</li> <li>• Add objectives relating specifically to freshwater, beds of rivers lakes wetlands and their margins, coastal water, outstanding natural features and landscapes including seascapes, land and seascapes, natural character.</li> <li>• Add the following biodiversity objective: "Indigenous biodiversity in terrestrial, freshwater and coastal environments is maintained through protection, and is restored and/or enhanced where it has been lost or degraded so that the full range of naturally occurring ecosystems and habitats and their complement of flora and fauna is present across/characterises the</li> </ul>	<ul style="list-style-type: none"> <li>• It is not only the values of natural and physical resources but also the life supporting capacity of air, water and soil and ecosystems that need to be recognised, maintained, and enhanced or restored where they have been degraded or lost.</li> <li>• Also the issues imply that degradation and loss may yet still happen whereas it's been happening for years already!</li> </ul>

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				<p>region, and enhancement, and restoration particularly in places where biodiversity has been lost, or degraded."</p> <ul style="list-style-type: none"> <li>• Add further objective: "Human activity supports the healthy functioning and resilience of naturally occurring ecosystems including where integrated with production systems"</li> <li>• Add an explanation that this objective seeks to halt and more so reverse the decline in Otago's biodiversity, and how retaining and enhancing indigenous habitats, will help halt the decline and why this is important for Otago's identity and economy.</li> <li>• Add similar Objective for the coastal ecosystems; "Coastal ecosystems and their life supporting capacity are protected and where degraded are enhanced and restored."</li> </ul>	
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	<p>Re write the issues to issues that specifically address the following: Objective 2.1 Issues</p> <ul style="list-style-type: none"> <li>• Cumulative effects of human activities, past and current on natural resources have resulted in loss of resource (e.g. extinct or nearly extinct species and rare ecosystem types such as saline's) or diminished value (e.g., freshwater ecosystems)</li> <li>• Over allocation (both quality and quantity) and degradation of freshwater resources.</li> <li>• Loss of indigenous habitats and species through land intensification and development, clearance of indigenous vegetation, tree planting.</li> <li>• Loss and degradation of wetlands.</li> <li>• Degradation and loss of resilience of indigenous ecosystems, through loss of area and fragmentation due to land use change, pests and weeds, climate change.</li> <li>• Loss of natural character along the margins of rivers lakes and the coast, through inappropriate land use and development.</li> <li>• Intensifying land use, resource exploitation and utility development threatening Outstanding Natural Landscapes and Features</li> <li>• Insufficient data collection, monitoring and analysis of natural resource attributes and values.</li> <li>• Also poor integration of land and water use management between agencies resulting in loss and degradation of natural resources – similarly not sure if an issues or a cause!</li> </ul> <p>Objective 2.2 Issues:</p> <ul style="list-style-type: none"> <li>• Lack of and inconsistent identification, recognition and protection of biodiversity</li> </ul>	<ul style="list-style-type: none"> <li>• The list of issues is overly general, and written to be a general truism for all resources.</li> <li>• The list does not include specific issues affecting specific natural and physical resources that are of regional significance.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				values, significant indigenous vegetation and significant habitats of indigenous fauna, outstanding natural features and landscapes.	
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	<p>Add new Policies:</p> <ul style="list-style-type: none"> <li>• "Facilitating and supporting restoration of degraded natural ecosystems and indigenous habitats using <del>where possible</del> indigenous species that naturally occur and/or previously occurred in the area."</li> <li>• "Avoiding fragmentation, reduction in size and extent of indigenous ecosystems and habitats of indigenous species."</li> <li>• "Facilitating and supporting the creation of new areas of indigenous vegetation and habitat for indigenous species, using species and processes inherently natural to the area."</li> <li>• "Avoiding significant adverse effects, avoiding remedying and mitigating other effects and offsetting any residual adverse effects that is more than minor in accordance with Appendix... (being Appendix One attached to this submission)"</li> </ul>	<p>Forest and Bird seeks further policies to address the issues relating to the degradation and over allocation of freshwater resources.</p> <ul style="list-style-type: none"> <li>• Restoration is needed in places where biodiversity has been lost and habitats degraded. This is required to restore viable populations of indigenous species across their natural ranges. Using eco sourced indigenous species that occur or once occurred will assist Councils to maintain indigenous biodiversity.</li> <li>• Fragmentation reduces the size and extent of habitats - resulting in losses in biodiversity.</li> <li>• Creation of new habitat is one way of reversing the decline in biodiversity.</li> <li>• Biodiversity maintenance is not achieved if biodiversity that is lost is not replaced by enhancement measures under a biodiversity offset.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	<ul style="list-style-type: none"> <li>• Re name title to read: <ul style="list-style-type: none"> <li>• "Managing for healthy freshwater ecosystems", or</li> <li>• "Achieve healthy freshwater ecosystems"</li> </ul> </li> <li>• Amend introductory text accordingly</li> <li>• Amend (a) to read: "Ensure all water bodies and their margins have healthy ecosystems; and"</li> <li>• Amend (b) to read: "Retain the <u>full</u> range of habitats and indigenous species supported by freshwater."</li> <li>• Retain (c) and (e) - (k)</li> <li>• Amend (d) to read: "Protect migratory requirements for all life cycle stages of freshwater species, unless detrimental to indigenous species."</li> <li>• Amend (l) to read: "Protect recreation values"</li> <li>• Add the following policies</li> <li>"q) Avoid human induced erosion and sedimentation</li> <li>r) Ensure all water bodies are safe for human health and contact recreation</li> <li>s) Avoid changes in hydrology which could adversely affect indigenous biodiversity.</li> <li>t) Halt the decline of indigenous species</li> <li>u) Phase out the over allocation of freshwater that adversely affects water quality and in stream flows by 2035.</li> <li>v) Set limits and targets to achieve ecological health for all water bodies."</li> </ul>	<ul style="list-style-type: none"> <li>• The policy creates ambiguity as freshwater values are not defined, and can be conflicting.</li> <li>• a) Strongly support managing for healthy ecosystems in all Otago water bodies and their margins.</li> <li>• a) The use of the term "support" is unclear and does not provide direction to decision makers. The word "ensuring" is used in other policies and is appropriate here.</li> <li>• b) This policy should be clear that it is the full range of habitats that needs to be retained as provided by the NZ Biodiversity Strategy.</li> <li>• d) The terminology migratory patterns are imprecise and could be more related to behaviour than protecting the habitat requirements for all life cycle stages.</li> <li>• l) The RPS does not define important recreational values; this is a superfluous and restricting qualifier.</li> <li>• Forest and Bird seeks further policies to address the issues relating to the degradation and over allocation of freshwater resources.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their	Amend	<ul style="list-style-type: none"> <li>• Retain (a) - (c) and (f) - (k) as proposed.</li> <li>• Amend (d) to read: "Maintain indigenous biodiversity and healthy</li> </ul>	<ul style="list-style-type: none"> <li>• Not all ecosystems are currently healthy, so the policy needs to provide for the restoration and enhancement of degraded ecosystems.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		margins		<p>ecosystems, enhance and restore degraded ecosystems and indigenous biodiversity."</p> <ul style="list-style-type: none"> <li>• Amend (e) to read: "Retain the full range of habitats and indigenous species supported by freshwater."</li> <li>• Amend (l) to read: "Maintain and restore bank stability and avoid bank erosion."</li> <li>• Add new paragraphs: "Maintain riparian vegetation where it protects water quality and habitat and restore riparian vegetation where it fails to protect water quality and habitat"</li> <li>"Protect recreational use and access to the margins of Otago's water bodies."</li> </ul>	<ul style="list-style-type: none"> <li>• This policy should be clear that it is the full range of habitats that needs to be retained as stated in the NZ Biodiversity Strategy.</li> <li>• Not all banks of water bodies are currently stable, where they are eroding and unstable they need to be restored to stability.</li> <li>• A key tool for managing margins is to maintain and restore riparian vegetation.</li> <li>• Margins of water bodies are important for recreation.</li> </ul>
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	<ul style="list-style-type: none"> <li>• Managing for healthy ecosystems on river beds, lakes, wetlands and their margins.</li> <li>• Amend (a) to read "Ensure healthy coastal ecosystems, and"</li> <li>• Amend (b) to read "Retain the full range of habitats and indigenous species in the coastal marine area"</li> <li>• Protect recreation values</li> <li>• Retain (c) - (g) and (l) as proposed.</li> </ul>	<ul style="list-style-type: none"> <li>• Support with proposed amendments.</li> <li>• The policy creates ambiguity as values are not defined, and can be conflicting.</li> <li>• Use of the term "support" is unclear and does not provide direction to decision makers. The word "Ensuring" is used in other policies e.g. Policies; 2.3.2 3.3.2, 3.8.1 and is appropriate for this policy.</li> <li>• This policy should be clear that it is the full range of habitats that needs to be retained as is stated in the NZ Biodiversity Strategy.</li> <li>• The RPS does not define 'important' recreational values; this is a superfluous and restricting qualifier.</li> <li>• Support c)-g) and i)</li> </ul>
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	<p>Add "d) ensure land uses and human activity generating air pollutants avoid adverse effects on visual amenity"</p>	<p>Need to manage burning to protect air quality for visual reasons e.g. winter burn offs ruining views of landscape on the best days</p>
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Support	Retain as proposed	No reason given.
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	<ul style="list-style-type: none"> <li>• Re-write heading to read: "Managing to achieve healthy natural ecosystems and indigenous biodiversity."</li> <li>• Re write the introductory text to accordingly, including reference to : "protecting the natural functioning of ecosystems, halting the decline in indigenous biodiversity and controlling adverse and cumulative effects on ecosystems and indigenous biodiversity by:"</li> <li>• Amend (a) to read; "Maintaining or enhancing ecosystem health, natural processes and indigenous biodiversity and habitats for indigenous species through-out Otago; and"</li> <li>• Amend (b) to read: "Maintaining, protecting enhancing areas of modified indigenous vegetation which contain indigenous biodiversity and habitats for indigenous species."</li> <li>• Amend (c) to read: "Providing for buffers and linking existing habitats of indigenous species where opportunities exist."</li> <li>• Amend (d) to read:</li> </ul>	<ul style="list-style-type: none"> <li>• Neither ecosystem nor biodiversity values are defined, and can conflict.</li> <li>• Address loss and degradation of natural ecosystems by managing adverse effects rather than ecosystems and indigenous biodiversity.</li> <li>• (a) more or less repeats the Act. Amend to make policy describe what is going to be done, rather than the outcome</li> <li>• (b) Much of Otago's remaining indigenous vegetation has been significantly modified, yet it retains habitats for indigenous species, and seed sources for restoration and enhancement. These can provide seasonal food sources, and ecological links.</li> <li>• (c) &amp; (d) support with proposed amendments</li> <li>• (h) It is important to prevent rather than control the spread of pests.</li> </ul>

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				"Protecting the hydrological services of tussock grasslands" <ul style="list-style-type: none"> <li>• Reword (e) - (g) to grammatically match above amendments.</li> <li>• Amend (h) to read: "Avoid the adverse effects of pest species, prevent their introduction and prevent their spread."</li> </ul>	
39	Natural resource value management - general	Policy 2.1.8 - Recognising the values of natural character in the coastal environment	Support	Retain.	No reason given.
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Amend	<ul style="list-style-type: none"> <li>• Amend to read: "Otago's significant and highly valued natural resources, indigenous vegetation, habitats and indigenous biodiversity are consistently identified and protected."</li> </ul>	<ul style="list-style-type: none"> <li>• Section 6 requires the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna.</li> <li>• This necessitates identifying and mapping them, and the development of methods and controls protect them from adverse effects.</li> <li>• To achieve integrated management, the methodology for doing this needs to be regionally consistent.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Support	Retain Policies 2.2.4, 2.2.12-15.	No reason given.
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	New Policy 2.2.8: "Identify the landward extent of margins of all freshwater bodies using the following criteria: a) area or landform where active riparian or lacustrine and/or wetland processes, influences or qualities are significant including legible historic processes and influences ; and b) the area dominated by vegetation associated with the water bodies and providing habitat for species dependent on the water body and its margins including dry to wet environments; and c) any landscape and natural feature that significantly contributes to the natural character, visual amenity and recreational value of the substitute word for coast?? water body and its margin?? e) the relationship of taka whenua with the margins of freshwater bodies"	<ul style="list-style-type: none"> <li>• To manage the margins of fresh water bodies the spatial extent needs to be defined.</li> <li>• A landscape approach has been taken to defining the coastal margin, a similar approach should be taken to freshwater body margins.</li> <li>• Degradation of natural character has occurred along river and lake edges because of lack of definition of margin and/ or limitation to physical banks of water body.</li> </ul>
42	Highly valued natural resources - indigenous biodiversity	Policy 2.2.1 - Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna	Amend	<ul style="list-style-type: none"> <li>• Amend title to include terrestrial, freshwater and coastal sites.</li> <li>• Amend to read: "Identify and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna for terrestrial and freshwater environments using the criteria set out in Schedule 5 (being the schedule as amended by this submission)."</li> <li>• Add new (b) "Identify and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna for coastal environments using the criteria set out in Schedule xx (being the schedule included in this submission in Appendix Two)."</li> </ul>	<ul style="list-style-type: none"> <li>• Traditionally the identification of significant sites has been better considered for terrestrial sites; however they also need to include freshwater and coastal habitats. This should be made clear.</li> <li>• The schedule 5 criteria have been developed for terrestrial ecosystems and are not totally applicable or appropriate for coastal environments.</li> <li>• Parts of Otago's coastal marine area have natural and physical values that are of regional, national and international significance. These have not been comprehensively identified in Regional or District Plans and should be remedied by the Proposed RPS.</li> </ul>
43	Highly valued natural resources -	Schedule 5 - Criteria for the	Amend	• Representative	• The description does not adequately describe "representative" and

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	indigenous biodiversity	assessment of significant indigenous vegetation and habitat of indigenous fauna		<p>"An area of indigenous vegetation or habitat of indigenous fauna that is representative, typical or characteristic of the natural diversity of the relevant ecological district."</p> <ul style="list-style-type: none"> <li>Diversity (add "and Pattern")</li> </ul> <p>Amend to read:</p> <p>"An area that supports a high diversity of indigenous ecosystem types, indigenous taxa or has changes in species composition reflecting the existence of diverse natural features or gradients."</p> <ul style="list-style-type: none"> <li>Ecological Context</li> </ul> <p>Add "vegetation" to a).</p>	<p>does not include habitats of indigenous fauna.</p> <ul style="list-style-type: none"> <li>Vegetation closest to the composition and structure that would have been expected to occur at the baseline of 1840 need to be included as representing the typical or characteristic of the natural diversity of the ecological district.</li> <li>Pattern refers to changes in the distribution and abundance of species/habitats across the site and is driven by underlying variation in the environment.</li> <li>Some areas can have important connectivity values for the dispersal of indigenous plants.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	<ul style="list-style-type: none"> <li>Amend title to read: "Protecting areas of significant indigenous vegetation and significant habitats of indigenous fauna which meets the terrestrial and freshwater criteria in Schedule 5 and coastal environments in Schedule xx, (being the schedule included in this submission in Appendix Two)."</li> <li>Amend descriptor to read: "Protect and enhance areas of significant indigenous vegetation and significant habitats of indigenous fauna from the adverse effects of subdivision, use and development, by:..."</li> <li>"(a) Avoiding adverse effects including cumulative effects on significant biodiversity that is vulnerable or irreplaceable and those values which contribute to the area or habitat being significant; and ..."</li> <li>(b) - (f) retain.</li> <li>Add new policy: "Avoid the adverse effects of pest species, prevent their introduction and their spread."</li> <li>Add new policy: "Offset any residual adverse effects that are more than minor through protection, restoration and enhancement actions that achieve no net loss and preferably a net gain in indigenous biodiversity in accordance with policy x and Appendix xx [See Appendix One attached to this submission]."</li> </ul>	<ul style="list-style-type: none"> <li>Council needs to protect rather than manage areas of significant indigenous vegetation and significant habitats of indigenous fauna in terrestrial, freshwater and coastal environments, and this is achieved through avoiding adverse effects of activities.</li> <li>It is unlikely that all areas of significant indigenous vegetation and significant habitats of indigenous fauna will be identified, due to difficult access, lack of resourcing, or overlooked. There need to be mechanisms to identify sites that meet the criteria at the time of resource consents.</li> <li>Vulnerable and irreplaceable habitats will be significant, but these particular values may not contribute to significance assessment.</li> <li>The policies need to include a policy about pests.</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Identify the outstanding natural landscapes and features including coastal features and landscapes ; and identify the attributes, qualities and features that contribute to their outstanding status using the methodology set out in Schedule 4	Needs more guidance - the attributes, qualities and features underlying outstanding status need to be identified.
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	<ul style="list-style-type: none"> <li>Reword title "Identifying the attributes, qualities and features that give other landscapes and natural features amenity value"</li> </ul>	<ul style="list-style-type: none"> <li>All landscape has amenity value of some kind and the RMA does not distinguish between important and significant or "special amenity" or "visual amenity" landscape and other landscape.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	<ul style="list-style-type: none"> <li>Protect or enhance the amenity of other landscapes and natural features, by: <ul style="list-style-type: none"> <li>a) avoiding adverse effects on those attributes, qualities and features that contribute</li> </ul> </li> </ul>	None reason given



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				<p>significantly to their amenity value</p> <p>b) ok but replace values with a/q/f as above</p> <p>c) as above</p> <p>d) [refer to submission for 2.2.4 d)]</p> <p>e) [refer to submission for 2.2.4 e)]</p> <ul style="list-style-type: none"> <li>• Add h) encouraging facilitating and supporting mitigation of existing adverse effects to improve amenity values as for 2.2.4f)</li> </ul>	
50	Highly valued natural resources - the coastal environment	Policy 2.2.8 - Identifying areas of high and outstanding natural character in the coastal environment	Amend	<ul style="list-style-type: none"> <li>• Reword heading: "Identify areas of high but not outstanding natural character in the coastal environment and the attributes, qualities and features contributing to the natural character, using Schedule 4 factors:"</li> </ul>	<ul style="list-style-type: none"> <li>• This policy should only be about coastal landscape that is of high natural character but not outstanding.</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	<ul style="list-style-type: none"> <li>• Reword as for 2.2.4 and 2.2.6 re changing word "values" for attributes qualities and features and also other changes already suggested.</li> <li>• Add h) encouraging facilitating and supporting mitigation of existing adverse effects to improve natural character.</li> </ul>	No reasons given.
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Support	Retain.	No reason given.
142	Objectives on use and enjoyment of natural and built environment	Issue 4.5 - Adverse effects from the use of Otago's natural and physical resources	Amend	Amend to read: "Otago's natural ecosystems and indigenous biodiversity and areas of significant indigenous vegetation and significant habitats of indigenous fauna and outstanding landscapes, for example....."	Otago's areas of biodiversity, natural ecosystems are under threat, as well as Otago's significant areas of biodiversity.
154	Land management for economic production	Policy suite 4.3 - Sufficient land is managed and protected for economic production	Oppose	Remove policies relating to rural land use from this chapter and embrace under a new Objective that reflects the requirements for sustainable management, protecting the life supporting capacity of productive rural ecosystems.	<ul style="list-style-type: none"> <li>• The term "sufficient" is open to interpretation.</li> <li>• Objective does not reflect RMA focus on sustainable management.</li> <li>• It is unclear what the land is to be protected from, and for what sorts of economic production. Arguable that all land is needed for economic production, regardless of whether activities are sustainable.</li> <li>• This chapter contains a grab bag of activities which are difficult to embrace under land use sustainability, which is a significant regional issue that needs to be addressed in the RPS, but which is not readily identifiable.</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend to read: "Managing for sustainable rural activities Ensure sustainable management of Otago's land resources to meet the present and reasonably foreseeable needs of Otago's communities by: (a) Protect the life supporting capacity of land resources and ecosystems and enable sustainable farming and other rural activities; and"	This policy fails to implement S5 of the RMA.
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Support	Retain (a) and (b).	<ul style="list-style-type: none"> <li>• Pleased to see recognition of the need to manage land to protect water yield.</li> </ul>
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Support	Retain (a).	Support the importance of avoiding mineral and gas exploration, extraction and processing in Otago's significant and outstanding areas.

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163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	Amend d) to read: "(d) Enable small scale on farm water harvesting and storage to reduce pressure on water bodies during periods of low flows."	Not all water harvesting and storage should be enabled.
165	Making the most of available resources	Policy 4.4.3 - Encouraging environmental enhancement	Support	Retain.	No reason given.
172	Management of adverse effects	Policy 4.5.5 - Controlling the introduction and spread of pest plants and animals	Amend	<ul style="list-style-type: none"> <li>Amend to read: "Preventing the introduction and spread of pest plants and animals"</li> <li>"Control the adverse effects of pest species, prevent their introduction and spread to safeguard:"</li> <li>Retain (a) - (g).</li> </ul>	No reason given
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Support	Retain.	No reason given
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	<ul style="list-style-type: none"> <li>Enable offsetting of any residual adverse effects that can not be avoided, remedied or mitigated, that are more than minor through protection, restoration and enhancement actions that achieve no net loss and preferably a net gain in indigenous biodiversity in accordance with policy // and Appendix xx (being the Appendix One attached to this submission)</li> <li>Retain (c).</li> </ul>	<ul style="list-style-type: none"> <li>(a) Restrict the use of offsetting to activities with a functional necessity to locate in significant or outstanding areas</li> <li>(a) Biodiversity maintenance is not achieved if it is not replaced by enhancement measures under a biodiversity offset. Offsetting should be enabled for all indigenous biodiversity and may be required for activities other than those that have a "functional necessity".</li> <li>(a) There may be occasions where adverse effects on indigenous vegetation that cannot be fully avoided, then offsetting may be required for activities other than those with a "functional necessity".</li> <li>(c) Biodiversity offsetting should not be applied to justify impacts on vulnerable and irreplaceable biodiversity values or biodiversity values which cannot be offset.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Amend to read: "Provide for offsetting according to the framework set out in Appendix xxxx (Being that attached to this submission as Appendix One)."	This policy sets out minimal criteria which are not sufficient to enable Councils to maintain indigenous biodiversity.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	<ul style="list-style-type: none"> <li>Retain 4.1.4</li> <li>New Method 4.1.13</li> </ul> <p>Add methods to specify that "City and District plans will set objectives, policies and methods to implement policies 2.1.6 – Managing for ecosystem and indigenous biodiversity values and 2.2.2 – Managing significant indigenous vegetation and significant habitats of indigenous fauna, by including provisions to:</p> <ol style="list-style-type: none"> <li>Manage indigenous vegetation clearance using case by case assessments to determine whether an area of indigenous vegetation or habitat is significant and warrants protection</li> <li>Include appropriate regulatory methods that control the clearance or modification of, indigenous vegetation and habitats of indigenous fauna.</li> <li>Require ecological assessments to accompany a resource management proposal or plan for an activity or development that may affect areas of indigenous vegetation and habitats of indigenous fauna."</li> </ol>	<ul style="list-style-type: none"> <li>No reason given in relation to 4.1.4</li> <li>As it is unlikely that all areas of significant indigenous vegetation and significant habitats of indigenous fauna will be identified at one time, and many may be missed, due to difficulty of gaining access, lack of resourcing, or overlooked, and as schedules inevitably go out of date, it is important that there are mechanisms to identify sites that meet the criteria at the time of resource consents that involve adverse effects on vegetation and habitats.</li> </ul>

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198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	<ul style="list-style-type: none"> <li>• Amend 6.1.2 a) to read: "Significant indigenous vegetation and significant habitats of indigenous fauna in using criteria for terrestrial and freshwater in Schedule 5 (as amended by this submission) and for the coastal marine area in Schedule xxxx"</li> <li>• Retain (b) - (f)</li> </ul>	Support with amendments
248	Appendices	Appendices - general	Amend	<p>New Schedule: "Schedule XX Biodiversity Offsetting The following sets out a framework for the use of biodiversity offsets. It should be read in conjunction with the NZ government Guidance on Good Practice Biodiversity Offsetting in New Zealand August 2014 (or any successor document):</p> <ol style="list-style-type: none"> <li>1. Restoration, enhancement and protection actions will only be considered a biodiversity offset where they are used to offset the anticipated residual effects of activities after appropriate avoidance, minimisation, remediation and mitigation actions have occurred as per the policies in Policies 2.1.6, 2.2.2 and 4.5.7. Biodiversity offsetting should not be applied to justify impacts on vulnerable and irreplaceable biodiversity values or biodiversity values which cannot be offset.</li> <li>2. Restoration, enhancement and protection actions undertaken as a biodiversity offset are demonstrably additional to what otherwise would occur, including that they are additional to any remediation or mitigation undertaken in relation to the adverse effects of the activity.</li> <li>3. Offset actions should be undertaken close to the location of development, where this will result in the best ecological outcome.</li> <li>4. The values to be lost through the activity to which the offset applies are counterbalanced by the proposed offsetting activity which is at least commensurate with the adverse effects on indigenous biodiversity, so that the overall result is no net loss, and preferably a net gain in ecological values.</li> <li>5. The offset is applied so that the ecological values being achieved through the offset are the same or similar to those being lost.</li> <li>6. The positive ecological outcomes of the offset last at least as long as the impact of the activity, and preferably in perpetuity. Adaptive management responses should be incorporated into the design of the offset, as required to ensure that the positive ecological outcomes are maintained over time.</li> <li>7. The biodiversity offset should be designed and implemented in a landscape context- i.e. with an understanding of both the donor and recipient sites role, or potential role in the</li> </ol>	Refer to earlier submission points

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>ecological context of the area.</p> <p>8. The protection and restoration actions undertaken as a biodiversity offset are delivered or demonstrated prior to the adverse effects occurring.</p> <p>9. The consent application identifies the intention to utilise an offset, and includes a biodiversity offset management plan that:</p> <ul style="list-style-type: none"> <li>i. sets out baseline information on all indigenous biodiversity) that are potentially impacted by the proposal at both the donor and recipient sites: <ul style="list-style-type: none"> <li>A. Originally rare ecosystem types (Williams et al. 2007);</li> <li>B. Indigenous vegetation on wetlands and sand dunes;</li> <li>C. Indigenous vegetation types;</li> <li>D. Important fauna habitats;</li> <li>E. Threatened, At Risk, and locally uncommon species; and</li> <li>F. Indigenous vertebrate fauna guilds, including each trophic level (herbivore, predator), feeding guilds of avifauna (insectivore, frugivore, nectivore, carnivore), and indigenous fish.</li> </ul> </li> <li>ii. includes clear objectives and performance criteria which demonstrates how the requirements set out in this appendix will be addressed,</li> <li>iii. identifies the monitoring approach that will be used to demonstrate how the matters set out in this appendix have been addressed, over an appropriate timeframe.</li> </ul> <p>(While this appendix sets out a framework for the use of biodiversity offsets in Otago, many of the concepts are also applicable to compensation actions i.e. where an overall outcome of no net loss (and preferably a net gain) in biodiversity values cannot be ensured through proposed restoration and protection actions."</p>	
248	Appendices	Appendices - general	Amend	<p>New Schedule  "Appendix Two  Schedule xxx  SIGNIFICANT ECOLOGICAL AREAS - MARINE CRITERIA  Identify areas of significant indigenous vegetation and the significant habitats of indigenous fauna in the coastal marine area as Significant Ecological Areas using one or more of inclusion criteria a - f  Sites should not generally be considered significant if they meet one of the exclusion criteria h-i  INCLUSION CRITERIA  a. RECOGNISED INTERNATIONAL OR NATIONAL SIGNIFICANCE  i It is an area identified as internationally or</p>	Refer to earlier submission points

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>nationally significant for either indigenous marine ecosystems or biodiversity, or with reference to the species that utilise these ecosystems</p> <p>b. THREAT STATUS AND RARITY:</p> <p>i. It is a habitat that is required to provide for the life cycle of a marine plant or animal that is locally rare and has been assessed under the New Zealand Threat Classification System (NZTCS), and determined to have a national 'At Risk' conservation status of Naturally Uncommon, Relict, Recovering and Declining. OR</p> <p>ii. It is a habitat that is required to provide for the life cycle of a plant or animal that occurs naturally in Otago and has been assessed by the Council to have a regional threatened conservation status including Regionally Critical, Endangered and Vulnerable and Serious and Gradual Decline OR</p> <p>iii It is a habitat that is required to provide for the life cycle of a plant or animal that occurs naturally in Otago and has been assessed by a nationally or internationally recognised assessment process (e.g., NZTCS, IUCN) and determined to have a threatened conservation status including Critical, Endangered, or Vulnerable. OR</p> <p>iv. It is a habitat that occurs naturally in Otago and is required to provide for the life cycle of a marine animal that is listed as a Protected Species in Schedule 7A of the Wildlife Act (1953);OR</p> <p>v It is an indigenous marine habitat or ecosystem that occurs naturally in Otago and has been assessed by the Council or other national assessment process to be threatened based on evidence and expert advice. OR</p> <p>vi. It is an indigenous vegetation or habitat of indigenous fauna that occurs within an indigenous coastal ecosystem as identified in NZCPS Policy 11b(iii) as being particularly vulnerable to modification.</p> <p>c. UNIQUENESS OR DISTINCTIVENESS:</p> <p>i. It is habitat for a marine plant or animal that is endemic or near-endemic to the Otago region OR</p> <p>ii. It is an indigenous ecosystem that is endemic to the Otago region or supports ecological assemblages, structural forms or unusual combinations of species that are endemic to the Otago region. OR</p>	

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>iii. It is a habitat that supports occurrences of a plant, animal or fungi that are the largest specimen or largest population of the indigenous species in Otago or New Zealand</p> <p>d. DIVERSITY:</p> <p>i. It is an intact habitat sequence extending across an environmental gradient, and including both floral and faunal habitat components; OR</p> <p>ii. It includes a large number of intertidal and/or sub tidal habitats; OR</p> <p>iii. It is a habitat type that supports a high species richness for its type.</p> <p>e. STEPPING STONES, BUFFERS AND MIGRATION PATHWAYS:</p> <p>i. It is a site which makes an important contribution to the resilience and ecological integrity of surrounding areas. OR</p> <p>ii. It is part of a network of sites that cumulatively provide important habitat for indigenous fauna or when aggregated make an important contribution to ecological function and integrity; OR</p> <p>iii. It is an example of an indigenous ecosystem, or habitat of indigenous fauna that is used by key species permanently or intermittently for an essential part of their life cycle, including migratory pathways, roosting or feeding areas; OR</p> <p>iv. It is an example of an ecosystem, indigenous vegetation or habitat of indigenous fauna, that is immediately adjacent to, and provides protection for, indigenous biodiversity in an existing protected natural area (established for the purposes of biodiversity protection for either terrestrial or marine protection) or an area identified as significant under the 'threat status and rarity' or 'uniqueness' criteria.</p> <p>f. REPRESENTATIVENESS:</p> <p>i. It is an example of an indigenous marine ecosystem (including both intertidal and sub tidal habitats, and including both faunal and floral components) that makes up part of at least 10% of the natural extent of each of Otago's original marine ecosystem types and reflecting the environmental gradients of the region; AND</p> <p>ii It is an example of an indigenous marine ecosystem, or habitat of indigenous marine fauna (including both intertidal and sub tidal habitats, and including both faunal and floral components), that is characteristic or typical of the natural marine ecosystem diversity of Otago; OR</p> <p>iii It is a habitat that is important to indigenous species of Otago, either seasonally or permanently, including for migratory species</p>	

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				<p>and species at different stages of their life cycle (and including refuges from predation, or key habitat for feeding, breeding, spawning, roosting, resting, or haul out areas for marine mammals); OR</p> <p>iv. It is an ecosystem that contains an intact ecological sequence across an environmental gradient (e.g., intact intertidal vegetation sequence including sea grass, salt marsh, and terrestrial coastal vegetation); OR</p> <p>v. It is an ecosystem that contains a large number of marine habitat types, with the full range of habitats represented that is typical for that depth and exposure within the Otago region; OR</p> <p>vi. It is a habitat or ecosystem of particular importance for indigenous or migratory species</p> <p><b>EXCLUSION CRITERIA</b></p> <p>h. It is a site maintained for aquaculture production of either native or non-indigenous marine fauna or flora.</p> <p>i. It is a novel or synthetic ecosystem dominated by non-indigenous marine fauna or flora."</p>	
249	Glossaries	Glossary	Amend	<p>Add new definitions:</p> <ul style="list-style-type: none"> <li>• "Biodiversity Offsets Measurable conservation outcomes resulting from actions designed to compensate for residual adverse biodiversity impacts arising from project development after appropriate avoidance, minimisation, remediation and mitigation measures have been taken. The goal of biodiversity offsets is to achieve no net loss and preferably a net gain of biodiversity on the ground."</li> <li>• "No net loss Means no net loss with respect to: <ul style="list-style-type: none"> <li>• Species abundance, population structure, and composition (e.g. individual species or species groups)</li> <li>• Habitat structure (e.g. vegetation tiers, vegetation pattern)</li> <li>• Ecosystem function (e.g. nutrient cycling rates)</li> <li>• People's use of and cultural values associated with biodiversity (e.g. particularly valued habitats or species).</li> </ul> </li> </ul> <p>No net loss, in essence, refers to the point at which biodiversity gains from targeted biodiversity management activities match the losses of biodiversity due to the impacts of a specific development project, so that there is no net reduction in the type, amount and condition (quality) of biodiversity. A net gain means that biodiversity gains exceed a specific set of losses associated with a development."</p>	Biodiversity Offsets is a specific terminology that requires definition.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
253	Other comments	Structure of the document & useability - general	Amend	Restructure the policy statement so that it has clear chapters, covering Kai Tahu, Land, Water, Biodiversity, Coast, Built Environment, Energy, Natural Hazards, Wastes and Hazardous Substances, Infrastructure etc.	<ul style="list-style-type: none"> <li>• Appreciate innovative and easy to read style, but:</li> <li>• Four high level outcomes are overly general and do not meet RMA requirements.</li> <li>• Non-traditional framework is hard to interpret and navigate, results in duplication and sometimes conflicting policies.</li> </ul>
259	Overall approach	Regionally significant issues	Oppose	<ul style="list-style-type: none"> <li>• Re write the issues for the region so that they are in accordance with Section 59 and 62 (RMA) to provide a more detailed overview of the significant issues including indigenous biodiversity, the regional matters of National Importance (S6 RMA).</li> <li>• Re write the objectives so that they deal with each of the regionally significant resource issues, rather than generalised outcomes, and provide clear reasons and explanations for Objectives and Policies.</li> </ul>	<ul style="list-style-type: none"> <li>• The issues do not provide a clear direction for the focus of objectives and policies, and don't satisfy RMA requirements.</li> <li>• Non-specific objectives fails to facilitate a level of detail needed to achieve integrated management.</li> <li>• Unclear purpose or status is of the narrative paragraphs in Objectives.</li> <li>• Many policies fail to describe how the objective is to be achieved.</li> </ul>
269	Objectives on high quality natural resources	Introduction to Objective 2.1	Amend	Objective 2.1: Re write text to better reflect the purposes of regional Policy statements and explain the importance of safeguarding the life supporting capacity of ecosystems and resources, and maintaining biodiversity.	Text observes that as the values associated with resources are conflicting it is not possible to maintain or enhance the resources to meet all values. The RMA requires that the life-supporting capacity of air, water, soil, and ecosystems is safeguarded and adverse effects on the environment are avoided remedied or mitigated. The purpose of an RPS includes providing for the integrated and sustainable management of the natural and physical resources which better reflects the focus of Objective 2.1.
270	Objectives on high quality natural resources	Introduction to Objective 2.2	Amend	Objective 2.2: Delete explanatory text and replace with text that explains that: "Protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna are a matter of National Importance. Many of Otago's sites have not been identified or protected. There is a need to ensure that the methodology for identifying and protecting these sites is consistent throughout Otago."	<ul style="list-style-type: none"> <li>• This necessitates identifying and mapping them, and the development of methods and controls protect them from adverse effects.</li> <li>• To achieve integrated management, the methodology for doing this needs to be regionally consistent.</li> </ul>

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	<ul style="list-style-type: none"> <li>• The amended document should, as a starting point, clearly identify the regionally significant issues that need to be addressed, following which, it should set out the objectives, policies and methods to address those issues.</li> <li>• Amend the PRPS to include a new section or statement setting out a clear, coherent, integrated strategy focussing specifically on the management of natural and physical resources.</li> <li>• Create additional provisions which specifically relate to regionally significant industry. These can adopt the model used in relation to regionally and nationally significant infrastructure.</li> <li>• Include more explicit provisions that recognise and provide for natural and physical resources to be used for the benefit of the social and</li> </ul>	<ul style="list-style-type: none"> <li>• Formally supports RPS, subject to the amendments listed.</li> <li>• "Good water quality" and circumstances where water quality might be "degraded" are not defined, similar for air.</li> <li>• No clear and evidential basis for policies which require specific actions in terms of maintaining or enhancing the quality of air or water.</li> <li>• The PRPS makes frequent use of the term "avoid" . In King Salmon, the use of the term "avoid" was found to mean "not allow" or "prevent the occurrence of". Ensure that use of the term is reserved for those circumstances that are demonstrated to be of outstanding significance.</li> <li>• PRPS lacks clarity in terms of the issues that need to be addressed and the direction that should be followed to address them.</li> <li>• There is little narrative to explain the relationship between outcomes and the issues that are of regional significance.</li> <li>• Little overall direction in terms of how a natural or physical resource is to be managed.</li> <li>• Significant duplication and inconsistency between policies.</li> <li>• A number of policies potentially relating to the management of resources to ensure economic and social well-being are set out under</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				economic well-being of the community.	<p>different individual outcomes with no overarching strategy identifying the regionally significant issues that need to be addressed or the manner in which certain resources should be managed.</p> <ul style="list-style-type: none"> <li>• Policies which simply set out a requirement that various values are "recognised" without providing guidance or direction for subsequent plan preparation or decision makers, have no purpose.</li> <li>• Lack of an overall strategy or clear policy direction will create confusion rather than provide certainty and result in inefficient and costly processes.</li> <li>• Piecemeal outcomes also allow those preparing lower order plans and proposals to adopt a selective approach, or an ad hoc approach to the weighting of conflicting policy issues.</li> <li>• PRPS does not appropriately reflect the importance of regionally significant industry or provide sufficient clarity and direction for their significance and requirements. Those requirements relate to access to critical natural and physical resources, the availability of land to establish operations, and protection against reverse sensitivity effects.</li> <li>• Imbalance between emphasis placed on environmental protection and policy support for activities supporting social and economic well-being.</li> </ul>
4	Overall approach	Introduction - RPS framework	Amend	<p>Amend the fourth outcome of the RPS Framework to read:            "People are able to use and enjoy our natural and built environment            Our individual and community wellbeing is built on use and development of <u>underpinned by activities that require access to natural and physical resources. In particular, regionally significant industries such as primary production and associated processing activities have high demands for natural resources such as soils and water as well as physical resources such as land on which to establish and operate, the transport network and other infrastructure.</u>            This fourth chapter builds on previous ones by enabling people to use the natural and physical environment resources for enjoyment and making a living, while ensuring that they are sustained. It also deals with managing conflicting or incompatible uses."</p>	<ul style="list-style-type: none"> <li>• The PRPS requires a restructure to clearly identify regionally significant values and issues, and the objectives that address those and achieve sustainable management.</li> <li>• The current approach provides little clarity. The supporting text provides no insight into the issues that affect the region's resources, or the competing interests that need to be balanced.</li> <li>• It does not explain what the significance of "Agriculture" being one of the region's biggest earners is for managing resources.</li> </ul>
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	<p>Include a new Objective:  <u>"Objective [X] Otago's special amenity landscapes and highly valued natural features are identified and protected from inappropriate development            Otago has a number of special amenity landscapes or natural features which are highly valued but which are not outstanding for the purposes of section 6 of the Resource Management Act 1991. Often, enabling development in these areas will be appropriate provided significant adverse effects can be appropriately avoided, remedied or mitigated."</u></p>	<ul style="list-style-type: none"> <li>• Approach of protection and enhancement of resources that fall within the scope of section 6 of the Act is not warranted for resources of lesser importance.</li> <li>• Need to provide context for policies 2.2.5, 2.2.6, 2.2.10, 2.2.11, 2.2.14 and 2.2.15 and for landscapes and features that do not fall within section</li> </ul>
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or	Amend	<p>Identify values then set measurable limits and targets to achieve overall water quality improvements in freshwater bodies.</p>	<ul style="list-style-type: none"> <li>• The NPSFM requires regional councils to identify freshwater objectives for national values and any other values determined to be appropriate. The PRPS makes no reference to these requirements.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		enhanced			<ul style="list-style-type: none"> <li>Given its focus on values rather than objectives, Fonterra considers that the PRPS does not give effect to the requirements of the NPSFM.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Oppose	<ul style="list-style-type: none"> <li>Delete Policy 2.1.1 and replace with a new policy or policies setting out the direction that is to be followed to achieve Objective 2.1, the aspects of the resource that are required to be managed, the criteria and thresholds that are to be attained or protected, including the setting of measurable limits or targets for freshwater management units to achieve overall water quality improvements.</li> </ul> <p>The following suggested policies are not exhaustive and only set out the key parts of policy framework that will, at least in part, address the core aspects the concerns raised:</p> <p>"Policy 1 Identification of freshwater values Identify the values of freshwater bodies using community and industry stakeholder involvement, to inform suitable objectives for the management of freshwater to maintain or improve overall water quality."</p> <p>"Policy 2 Identification of freshwater management units Identify management units for the purpose of freshwater management."</p> <p>"Policy 3 Management of freshwater resources Manage freshwater to: [a]) Achieve agreed objectives in relation to overall water quality improvement where currently degraded; and [b]) Maintain and enhance the life supporting capacity of freshwater resources; and [c]) Maintain the availability of suitable water supplies to meet the needs of communities and regionally significant industry; and [d]) Protect Kai Tahu and other cultural values; and [e]) Maintain and enhance the natural functioning of water bodies, their riparian margins and aquifers; and [f]) Maintain the range and extent of habitat provided by freshwater bodies; and [g]) Avoid the adverse effects of pest species, prevent their introduction and reduce their spread."</p> <ul style="list-style-type: none"> <li>Identify those water bodies that are already known to have high values and describe the process to be followed and the matters to be considered to identify the values of other water bodies.</li> </ul>	<ul style="list-style-type: none"> <li>The Policy does not give effect to the NPSFM. It sets out a list of matters to be achieved in their entirety through all freshwater bodies.</li> <li>Methods 1, 3 and 7, provide no indication of the matters to be addressed, or priorities among the matters listed in the Policy.</li> <li>Policy needs to signal that the definition of management units is an essential procedural step.</li> <li>Notified a): there is no explanation of how a "healthy" ecosystem will be assessed or implemented.</li> <li>Notified f): there is no definition of "good" water quality or of the circumstances or timeframes in which water quality will be considered "degraded".</li> <li>Notified k): It is unclear whether "other cultural values" refers to the same values that are referenced in clause j), or in Policy 1.2.1</li> <li>Notified l): there is no definition of "important" recreation values or how they should be identified.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and	Oppose	Delete Policy 2.1.2.	The policy duplicates the matters set out under Policy 2.1.1 and appears to be within the scope of Clause a) of Policy 2.1.1.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		lakes, wetlands, and their margins			
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	<p>Amend as follows:</p> <p>"Policy 2.1.3 Managing for coastal water values Recognise coastal water values, and manage coastal water, to:</p> <p>...  d) Maintain coastal water quality <u>at a level that is sufficient to ensure ecosystem health</u>, or enhance it where it has been degraded; and  e) <del>Maintain or enhance coastal values;</del> and  f) Protect Kai Tahu <u>and other cultural</u> values; and  g) <del>Provide for other cultural values;</del> and  h) <del>Protect important recreation values</del> <u>Ensure the coastal environment is able to support a range of recreational values</u>; and  ...".</p>	<ul style="list-style-type: none"> <li>• The policy requires amendment to remove the ambiguity of clauses d), e), g) and h), and include criteria or thresholds to enable consistent administration of clauses d &amp; h.</li> <li>• f): there is no definition of "good" water quality or of the circumstances or timeframes in which water quality will be considered "degraded".</li> <li>• e): "Coastal values" is not defined, its application is vague, and appropriate values are addressed elsewhere in the policy.</li> <li>• g): It is unclear whether "other cultural values" refers to the same values that are referenced in clause j), or in Policy 1.2.1</li> <li>• h): There is no definition of "important" recreation values and how they relate to the coastal environment.</li> </ul> <p>include criteria or thresholds to enable consistent administration of clauses d and h:</p>
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	<ul style="list-style-type: none"> <li>• Amend clause a) to read: "Maintain good ambient air quality that <u>avoids unacceptable risks</u> to supports human health, or enhance air quality where it has degraded to a level that is adversely affecting human health; and".</li> <li>• Delete Policy 2.1.4 clause c) or identify the specific values and their associated criteria or thresholds that are to be attained or protected.</li> </ul>	<ul style="list-style-type: none"> <li>• Clause a) provides no explanation of the circumstances or timeframes in which air quality will be judged to have been "degraded".</li> <li>• This approach does not provide the flexibility to consider the operational requirements and characteristics of regionally significant industrial activities that may occur within areas where, historically, air quality has declined.</li> <li>• Clause c) requires either amendment to identify the specific values that are to be maintained, or deletion. In its current form it provides no helpful guidance or direction to assist the preparation of lower order plans or development proposals.</li> </ul>
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	<ul style="list-style-type: none"> <li>• Delete clauses h), i) and k),</li> <li>• Amend g) to read: "g) Protect Kai Tahu and <u>other cultural values</u>; and".</li> </ul>	<ul style="list-style-type: none"> <li>• Clauses h), i) and k) are ambiguous or duplicate other PRPS provisions.</li> <li>• For h) It is unclear whether "other cultural values" refers to the same values that are referenced in clause g), or in Policy 1.2.1. Those values should be included in g).</li> <li>• Clause i) is capable of broad application and could stymie primary production activities. Heritage is managed through Policy 4.2.3.</li> <li>• For k) "Contamination"s definition in the RMA does not imply that it will result in adverse effects. Contaminated land and potentially contaminating activities are managed through the policy framework under Objectives 3.9 and 4.5.</li> </ul>
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Oppose	Delete Policy 2.1.7.	The policy lacks any specific purpose or direction.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Amend	<ul style="list-style-type: none"> <li>• Retain Schedule 4 but ensure it clearly contemplates both outstanding landscapes (as provided by section 6 of the Act) and other landscapes which might be special amenity landscapes or have high valued natural features but which are not outstanding.</li> <li>• Include a discussion of the purpose and application of the attributes set out (and ensure the attributes align with relevant case law principles such as those included in the modified Pigeon Bay criteria).</li> <li>• Include express reference to outstanding landscapes being in the context of section 6 of</li> </ul>	<ul style="list-style-type: none"> <li>• Schedule 4 needs to be structured to make it clear that it is intended to be used for the purposes of identifying outstanding natural features and landscapes (as contemplated by section 6 of the Act), and other landscapes, which are highly valued natural features and need to be protected from inappropriate development.</li> <li>• There is considerable case law that can be used to determine the status of a landscape. Referencing biophysical, sensory and associative attributes needs to occur in a manner that avoids limiting or fettering the "proper" consideration of landscapes in the context of relevant (and potentially changing) case law.</li> <li>• While Schedule 4 sets out high level criteria to enable sites and features to be identified on a consistent basis, neither the Policy nor the Schedule define thresholds in terms of size or rarity.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				the Act (and not more generally).	
39	Natural resource value management - general	Policy 2.1.8 - Recognising the values of natural character in the coastal environment	Oppose	Delete Policy 2.1.8.	The policy lacks any specific purpose or direction.
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend Policy 2.2.3 as follows: "Policy 2.2.3 Identifying outstanding natural features, landscapes and <u>coastal environments seascapes</u> Identify areas and values of outstanding natural features, landscapes and <u>coastal environments (as anticipated by section 6 of the Resource Management Act 1991)</u> seascapes, using the attributes as detailed in Schedule 4."	<ul style="list-style-type: none"> <li>Policy requires amendment to ensure that it more closely reflects the terminology used in Section 6 of the Act.</li> <li>While Schedule 4 sets out high level criteria to enable sites and features to be identified on a consistent basis, neither the Policy nor the Schedule define thresholds in terms of size or rarity.</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Policy 2.2.4 Managing outstanding natural features, landscapes, and <u>coastal environments seascapes</u> Protect, enhance and restore the values of outstanding natural features, landscapes and <u>coastal environments (as anticipated by section 6 of the Resource Management Act 1991)</u> , seascapes by: a) Avoiding adverse effects on those values which contribute to the significance of the natural feature, landscape or <u>coastal environments seascapes</u> ; and ..."	The policy requires amendment to more closely reflect the terminology used in section 6 of the Act.
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Make better reference to the meaning of outstanding as follows: "Identify areas and values of special amenity landscape or natural features ... which are not outstanding <u>for the purposes of section 6 of the Resource Management Act 1991</u> , using the attributes detailed in Schedule 4."	<ul style="list-style-type: none"> <li>The policy appears to relate to landscapes and features that fall outside of section 6 of the Act but which might generally fall within the "Other matters" contemplated by section 7 of the Act.</li> <li>To be meaningful in terms of regional policy direction, the PRPS requires amendment to ensure that the values of landscapes and features are identified in a consistent manner, having regard to their regional significance.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	<ul style="list-style-type: none"> <li>Amend the Policy to read: "<u>Manage Protect or enhance the values of special amenity landscapes and highly valued natural features, by:</u> a) <u>Avoiding, remedying or mitigating significant adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and ...</u>"</li> <li>Delete (b).</li> <li>Retain (c) to (f).</li> </ul>	<ul style="list-style-type: none"> <li><u>Management of these resources should be aimed at achieving the new Objective proposed by Fonterra, seeking that amenity landscapes and features are identified and protected from inappropriate development.</u></li> <li><u>It is not appropriate that the identified landscapes and features are subject to the same restrictions as those provided by Policy 2.2.4.</u></li> </ul>
50	<u>Highly valued natural resources - the coastal environment</u>	Policy 2.2.8 - <u>Identifying areas of high and outstanding natural character in the coastal environment</u>	Oppose	Delete Policy 2.2.8.	<u>Provides no specific policy direction and duplicates matters that are within the scope of Policy 2.2.3.</u>
51	<u>Highly valued natural resources - the coastal environment</u>	Policy 2.2.9 - <u>Managing the natural character of the coastal environment</u>	Oppose	Delete Policy 2.2.9.	<u>Duplicates matters that are within the scope of Policy 2.2.4.</u>
54	<u>Highly valued natural resources - outstanding water bodies</u>	Policy 2.2.12 - <u>Identifying outstanding water bodies and wetlands</u>	Oppose	Delete Policy 2.2.12.	<u>Duplicates matters that are within the scope of Policy 2.2.3.</u>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Oppose	Delete Policy 2.2.13.	Duplicates matters that are within the scope of Policy 2.2.4.
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Support	Retain Policy 2.2.14.	Identifies matters that underpin the economic value of the soil resource for primary production activities.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Replace clause d) and include additional provisions to read: "(d) Avoiding the use of highly valued soils for urban expansion unless no alternative with lower value soils is available. (e) Ensuring that land use activities on highly valued soils are consistent with the continued use of such soils for primary production purposes."	<ul style="list-style-type: none"> <li>Support the policy as it identifies matters that underpin the economic value of the soil resources for primary production activities.</li> <li>Clause (d) is in conflict with the intention of the policy to "protect" highly valued soils. Amendment is needed to ensure that highly valued soils are generally only used for urban purposes where the area has been identified as a planned expansion of an existing urban area.</li> </ul>
62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Amend	<ul style="list-style-type: none"> <li>Amend Policy 2.3.3 a) to read: "a) Using consistent freshwater objectives for interconnected water bodies. Developing objectives, targets and limits for freshwater catchments based on those identified through the National Objectives Framework; and".</li> <li>Include an additional clause aa) to read: "aa) Identifying through community and stakeholder involvement, the freshwater values to enable the establishment of freshwater objectives; and".</li> <li>Amend clause b) to read: "b) Recognising the importance of river morphology, catchment hydrology, natural processes, land cover and the use of water in defining regional catchment objectives supporting catchment values;"</li> <li>Amend clause c)i) to read: "i. Maintain or enhance overall freshwater values; and".</li> <li>Retain [c]ii. to iv as notified.</li> </ul>	<ul style="list-style-type: none"> <li>Supports intention to apply integrated management for freshwater catchments.</li> <li>Clause a) requires amendment to improve consistency with NPSFM.</li> <li>Clause b) requires amendment to recognise the importance of "water use" as a value within freshwater management units.</li> <li>Clause c) requires amendment to reflect the focus of the NPSFM on managing the overall impact on achieving water values.</li> </ul>
64	Natural systems and interdependencies	Policy 2.3.5 - Applying an integrated management approach for airsheds	Amend	Amend Policy 2.3.5 to read: "Apply an integrated management approach to activities that affect air quality, by: a) a) Setting emission standards for airsheds that take into account and enable foreseeable demographic and economic changes, and their effects on cumulative emissions; and b) Co-ordinating the management of land use and air quality, to: i Maintain or enhance air quality values Achieve emission standards for airsheds; and ii Reduce the potential for adverse health effects; and iii Avoid the potential for reverse sensitivity nuisance effects."	<ul style="list-style-type: none"> <li>Supports intention to apply integrated management for airsheds.</li> <li>Discharges to air are an essential aspect of industrial and a number of other activities.</li> <li>What constitutes "unacceptable" depends on nature and effects of the discharge, rather than the current level of air quality.</li> <li>It is unlikely that adverse effects from heating appliances (especially in urban areas) can be avoided, but reverse sensitivity effects can.</li> <li>Provide clear direction to adopt a consistent approach to avoiding reverse sensitivity, to ensure that lower order plans provide for the continued operation and expansion of industrial activity.</li> </ul>
65	Chapter B3 - Resilience, health and safety	Chapter B3 - general requests	Oppose	Amend the PRPS to include the following objectives and policies: "Objective [x] Regionally significant industries and associated activities are able to establish, operate and grow. Regionally significant industries, particularly primary production activities, are critical to the social and economic wellbeing of the regional	<ul style="list-style-type: none"> <li>PRPS needs Objectives, Policies and Methods that recognise and provide for the continued operation and expansion of regionally significant industry.</li> <li>The PRPS lacks any overall strategy or clear direction that will ensure that regionally significant industry will continue to support the economic and social well-being of the community.</li> </ul>

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				<p><u>community. These activities often have functional locational requirements and have a heavy reliance on the availability of and access to natural resources such as soils and water, and physical resources such as transport infrastructure networks. Recognising and providing for these requirements will support the integrated management of resources and the avoidance of activities that would threaten the continued operation of regionally significant industry."</u></p> <p><u>"Policy [X] Recognise and provide for the establishment, operation and expansion of regionally significant industries by:</u>  <u>a) co-ordinating infrastructure and service provision at a scale appropriate to the activities likely to be undertaken;</u>  <u>b) enabling the establishment and colocation of supporting activities;</u>  <u>c) maintaining and where appropriate enhancing access to natural and physical resources, including regionally significant infrastructure;</u>  <u>d) avoiding the potential for reverse sensitivity."</u></p> <p><u>"Policy [Y] Manage the adverse effects of regionally significant industries and associated activities by:</u>  <u>a) Giving preference to the location of regionally significant industries away from outstanding natural features, outstanding landscapes and areas of significant indigenous vegetation and significant habitats of indigenous fauna, outstanding water bodies and wetlands; or</u>  <u>b) Where the locations identified in a) above cannot be avoided, avoiding significant adverse effects on those values that contribute to the significance of the feature; and</u>  <u>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3."</u></p>	
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Oppose	Delete Objective 3.1.	The objective lacks any specific purpose or direction.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Oppose	Delete policy 3.1.1.	The policy lacks any specific purpose or direction.
96	Objectives on resilience, health and safety	Objective 3.4 - Good quality infrastructure and services meet community needs	Amend	Amend Objective 3.4 to read: "Objective 3.4 <u>Ensure good quality infrastructure and services are available and meet community needs."</u>	The words "good quality" are unnecessary or helpful as the appropriate focus is on ensuring that infrastructure meets community needs.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend Policy 3.4.1 to read: "Achieve the strategic integration of infrastructure with land use, by: a) <u>Recognising and providing for the functional</u>	<ul style="list-style-type: none"> <li>• Provide clearer direction on how coordinating infrastructure with land use is to be achieved.</li> <li>• Enable infrastructure related to regionally significant economic activity which is essential to the social and economic well-being of the</li> </ul>

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				needs of infrastructure of regional or national importance; and b) <u>Recognising and providing for the infrastructure requirements of regionally significant industry and associated activities; and</u> c) <u>Designing Enabling</u> infrastructure to <u>that</u> takes into account: ..... d) <u>Managing Directing</u> urban growth <u>towards areas:</u> i <u>Within areas</u> that have sufficient infrastructure capacity; or ii Where infrastructure capacity can be <u>provided</u> , upgraded or extended efficiently and effectively; and d) e) ..."	Region.
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend Policy 3.4.2 b) to read: "b) <del>Reduce</del> <u>Avoid, remedy or mitigate significant</u> adverse effects of those activities..."	Amendment to ensure that the policy does not unnecessarily constrain infrastructure provision. As written, the policy requires that any adverse effects should be reduced, regardless of their significance, or the ability to achieve any reduction.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Retain Policy 3.5.1 as notified subject to the following amendments: "Recognise <del>the national and regional significance of</del> and <u>provide for the continued operation of the following regionally and nationally significant infrastructure:...</u> "	<ul style="list-style-type: none"> <li>The sole focus on recognition does not provide sufficient clarity or direction for lower order plans or consenting processes.</li> <li>Require that such processes provide for the continued operation of regional and nationally significant infrastructure.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend Policy 3.5.2 to read: " <u>Minimise Manage</u> significant adverse effects from infrastructure that has national or regional significance, by..."	<ul style="list-style-type: none"> <li>The Policy requires that all adverse effects are minimised regardless of their significance or the potential for them to be reduced.</li> <li>Given the significant of the resource, focus on significant adverse effects and provide flexibility to manage rather than minimise them, as the latter term could imply that they should be avoided.</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Support	Retain Policy 3.5.3 as notified.	The policy provides appropriate and clear direction to ensure that regionally and nationally significant infrastructure will contribute to the social and economic well-being of the Region.
107	Objectives on resilience, health and safety	Objective 3.6 - Energy supplies to Otago's communities are secure and sustainable	Support	Retain Objective 3.6 as notified.	A reliable energy supply is critical to the community.
112	Energy	Policy 3.6.4 - Enabling more efficient transport of electricity	Support	Retain Policy 3.6.4 as notified.	The Policy provides appropriate and clear direction that will enable the continued operation and expansion of transmission and infrastructure enabling economic and social wellbeing.
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Support	Retain Policy 3.6.5 as notified.	The Policy provides appropriate and clear direction that will enable the continued operation and expansion of infrastructure enabling economic and social wellbeing.
114	Energy	Policy 3.6.6 - Reducing long term demand for fossil fuels	Amend	Amend Policy 3.6.6 to read "Reduce the long term demand for fossil fuels from <u>transport activities in</u> Otago's communities, by..."	<ul style="list-style-type: none"> <li>There are industrial processes (such as milk processing) that have very limited or sometimes no ability to avoid fossil fuel use.</li> <li>The policy does not appear to address wider fossil fuel use outside of the transport sector. Fonterra supports measures that will increase the efficiency of freight movements but seeks that no further changes are made to the policy.</li> </ul>
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Support	Retain Objective 3.8 as notified.	Support the recognition of the importance of managing the interface between urban and rural areas and the need to reduce pressure on primary production activities.
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Retain Policy 3.8.1 subject to the following amendments:	<ul style="list-style-type: none"> <li>Clause a) needs to be supported by ensuring that infrastructure and services are able to be provided to service such development.</li> </ul>

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				<ul style="list-style-type: none"> <li>• Include an additional clause to read: "<u>Ensuring that infrastructure and services are planned and programmed to support the anticipated development of planned urban growth areas; and</u>".</li> <li>• Delete clause b).</li> <li>• Retain clause c) subject to the following amendment: "Identifying <u>and defining</u> future growth areas ...".</li> <li>• Delete clauses d), f), g) and h).</li> <li>• Include an additional clause to read: "<u>Ensure that the identification and development of urban growth areas will not result in reverse sensitivity effects on established regionally significant industry.</u>".</li> </ul>	<ul style="list-style-type: none"> <li>• Clause d) undermines clause c). An amendment to c) to require the definition of future growth areas will be more effective in ensuring that new development is appropriately located and served by infrastructure.</li> <li>• Clauses b), f), and g) duplicate or are inconsistent with respectively Policy 3.4.1, Policy 2.3.5 and Policy 3.7.1.</li> <li>• It is unclear how Clause h) relates to a regionally significant issue or how it will be applied in practice.</li> <li>• Need to ensure that the management of urban growth areas does not result in reverse sensitivity effects on regionally significant industry.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Amend	Amend clause c) to read: " <u>Avoiding Enabling</u> urban development beyond the urban growth boundary or future urban development area <u>only where there is a demonstrable functional or operational need.</u> "	<ul style="list-style-type: none"> <li>• In the absence of a definition for "urban", there is potential for some activities to be regarded as urban even though they might locate in a rural area.</li> <li>• Need to ensure the PRPS will not preclude a proposal where there is a compelling requirement for development to be located beyond defined urban growth areas.</li> <li>• Dairy processing is an inherently rural activity (and if a definition is so provided) it should be included on that basis.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<ul style="list-style-type: none"> <li>• Delete clause a)iii.</li> <li>• Reword Clause b) and b)ii to refer to "highly valued soils" in place of "highly versatile soils".</li> <li>• Delete Clause d).</li> </ul>	<ul style="list-style-type: none"> <li>• Need to address duplicate provisions, target important rural resources and remove ambiguity.</li> <li>• Clause a)iii duplicates the content of clause a)ii.</li> <li>• Clauses b) and b)ii are restricted to highly versatile soils rather than "highly valued soils" that are the subject of Policy 2.1.5.</li> <li>• Clause d) is ambiguous, but seems to be reflected in clause c) in any event.</li> </ul>
130	Hazardous substances and waste	Policy 3.9.1 - Integrating management of hazardous substances and waste	Support	Retain Policy 3.9.1 as notified.	An integrated approach will reduce the potential for duplication of regulatory provisions arising between regional and district plans and those set out under HSNO.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	<ul style="list-style-type: none"> <li>• Delete clause a).</li> <li>• Amend Clause f)i. to read: "i Authorised facilities for hazardous substance <u>use, storage, treatment or disposal, or</u>".</li> </ul>	<ul style="list-style-type: none"> <li>• Clause a) reads as a standard rather than as policy direction. It duplicates existing regulatory controls set out under HSNO (e.g. spill containment) and provides an inappropriate level of detail for a PRPS.</li> <li>• Need to ensure that management of reverse sensitivity effects also relates to activities that use hazardous substances rather than those which just treat or dispose of them.</li> </ul>
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	<ul style="list-style-type: none"> <li>• Include a definition of "contaminated land" in the PRPS, adopting the same definition as set out in Section 2 of the RMA: "<u>Contaminated land</u> <u>Land that has a hazardous substance in or on it that—</u> <u>a) has significant adverse effects on the environment; or</u> <u>b) is reasonably likely to have significant adverse effects on the environment.</u>"</li> <li>• In the alternative, amend policy to include reference to "<u>contaminated land as defined in the Resource Management Act 1991</u>".</li> </ul>	<ul style="list-style-type: none"> <li>• Without definition, "contaminated land" has the potential to relate to the release of any type or level of contaminant, regardless of whether this would have beneficial effects.</li> <li>• The policy should adopt the definition used in section 2 of the Act to ensure that it relates to circumstances that would give rise to significant adverse effects.</li> </ul>
135	Hazardous substances and waste	Policy 3.9.6 - Encouraging use of best management practices for hazardous substance use	Amend	<ul style="list-style-type: none"> <li>• Replace "best management practices" with "best practicable option".</li> <li>• Delete the words: "<del>-, including reducing their</del>".</li> </ul>	<ul style="list-style-type: none"> <li>• "Best practicable option" has a specific meaning within the Act.</li> <li>• The use of hazardous substance in Fonterra's processing operations is a critical component driven by global regulatory requirements on</li> </ul>



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				use."	food hygiene. As written, the policy could restrict dairy production and processing capability within the region.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Include an additional clause to read: " <u>Ensure a level of security consistent with the operational requirements of a lawfully established activity or resource consent.</u> "	Public access may not be appropriate or desirable where it would (in addition to the matters set out) raise issues of security associated with the exercise of a lawfully established activity or resource consent requirement.
149	Historic heritage	Policy 4.2.1 - Recognising heritage themes	Oppose	Delete Policy 4.2.1.	<ul style="list-style-type: none"> <li>The Policy lacks any specific purpose or direction.</li> <li>The scope of the areas or features that potentially comprise "19th and early 20th century pastoral sites" is undefined and there are no criteria to enable decision makers to understand the significance of such sites.</li> <li>The Policy is to be implemented through Methods 3, 4 and 7 but there is no reference to the Policy within any of those Methods.</li> </ul>
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for economic production	Support	Retain Objective 4.3 as notified.	Fonterra supports the aim of protecting resources needed for the continued operation of primary production activities.
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend Policy 4.3.1 clause a) to read: "a) Enabling <u>primary production farming</u> activities and other rural activities that support the rural economy; and)".	It would improve the clarity of the Policy to refer to "primary production activities" rather than farming activities.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Support	Retain Policy 4.3.5 as notified	Provides a clear and enabling framework for the efficient use of industrial land for industrial purposes.
161	Objectives on use and enjoyment of natural and built environment	Objective 4.4 - Otago's communities can make the most of the natural and built resources available for use	Support	Retain Objective 4.4 as part of a restructured PRPS to provide a more coherent strategy for the management of resources to provide for economic and social well-being.	This objective should form part of the suite of provisions concerned with the management of resources to provide for economic and social well-being, which would include existing provisions relating to Regionally Significant Infrastructure and proposed provisions relating to Regionally Significant Industry and Primary Production.
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	Retain Policy 4.4.1 subject to an additional clause to read: " <u>e) Recognising and providing for the continued operation and expansion of regionally significant industry and primary production activities.</u> "	Ensure that the Policy recognises and provides for the needs of regionally significant industry and primary production so that in the allocation of water and the terms of any consents, decision makers will recognise the significant investment and the wider social and economic benefits associated with enabling such activities.
166	Objectives on use and enjoyment of natural and built environment	Objective 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Amend	Amend Objective 4.5 to read: " <u>Enable the use of natural and physical resources provided significant adverse effects are avoided, remedied or mitigated. Adverse effects of using and enjoying Otago's natural and built environment are minimised.</u> "	Amendment is necessary to provide a clearer focus in line with Part II of the Act.
167	Management of adverse effects	Policy suite 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Amend	Include the following policy: " <u>Policy [x] Offsetting for freshwater</u> <u>Provide for the offsetting of effects relevant to the achievement of freshwater objectives where:</u> <u>a) The direct effects of an activity cannot be avoided, remedied or mitigated; and</u> <u>b) The offset will contribute to the achievement of overall freshwater quality within a defined management unit; and</u> <u>c) Offsetting will reduce the adverse effects of discharges affecting degraded management units.</u> "	Fonterra supports the use of "off-setting" policies to achieve Objective 4.5 but considers that the policy approach should also relate to freshwater.
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Amend	<ul style="list-style-type: none"> <li>Delete Policy 4.5.1 and replace with new policies dealing separately with discharges to land, water and air. The following suggested policies are not exhaustive and only set out the</li> </ul>	<ul style="list-style-type: none"> <li>The policy relates to any form of discharge in any environment, for any purpose. It does not enable consideration of the capacity of the receiving environment to assimilate contaminants. This establishes an unreasonably low threshold, regardless of any benefits associated</li> </ul>

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				<p>key parts of policy framework that will, at least in part, address the core aspects the concerns raised:</p> <ul style="list-style-type: none"> <li>In relation to water:  <u>"Policy [X] Manage the adverse effects of discharges to water bodies to achieve agreed objectives to maintain or improve overall water quality."</u> </li> <li>In relation to land:  <u>"Policy [Y] Manage the adverse effects of discharges to land to:</u>  <u>[a)] maintain ecosystems; and</u>  <u>[b)] protect Kai Tahu and other cultural values;</u>  <u>and</u>  <u>[c)] avoid, remedy or mitigate the effects of erosion and sedimentation on watercourses;</u>  <u>and</u>  <u>[d)] avoid the creation of contaminated land."</u> </li> <li>In relation to air:  <u>"Policy [Z] Manage the adverse effects of discharges to air to avoid unacceptable effects on human health."</u> </li> </ul> <p>• If, contrary to Fonterra's primary sought relief, Policy 4.5.1 is retained, it needs to be amended to provide:  <u>"Policy 4.5.1 Avoiding Managing the effects of objectionable discharges</u>  <u>Avoid, remedy or mitigate discharges that are objectionable or offensive to takata whenua and the wider community, including: ..."</u> </p>	<p>with the discharge or the discharging activity.</p> <ul style="list-style-type: none"> <li>The approach does not appear to be underpinned by a regionally significant issue and it fails to provide a workable framework that will enable an integrated approach to future development within the region. Unless there is an evidential basis for the policy it should be deleted. Alternatively, the policy approach should be amended to focus on the "management of the adverse effects of discharges".</li> </ul>
178	Methods	Methods - general	Amend	Amend the PRPS to identify matters that are expected to be addressed through resource consent processes pending the preparation of regional and district plans.	<ul style="list-style-type: none"> <li>Part C does not recognise that the PRPS is also required to be addressed by applicants for resource consent.</li> <li>The PRPS leaves a significant number of matters "open-ended". Pending the completion of District Plan and Regional Plan processes, these matters will also need to be addressed by applicants and assessed by decision-makers.</li> <li>If a matter warrants identification as being of regional significance in the PRPS then the regional council should provide clear direction on how it is expected to be managed, including whether this is intended solely to be achieved through the preparation of regional or district plans or whether it is intended to have relevance to resource consent applications.</li> </ul>
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Amend	Delete Method 2.3, or alternatively, identify the criteria and thresholds that will be used to determine where the approach might be applied.	<ul style="list-style-type: none"> <li>Assume that this Method is intended to implement policies set out under Objective 3.2, though this is not stated.</li> <li>It could have significant effects on regionally significant activities and investment and should be deleted or amended to explain the criteria and thresholds that will determine where such an approach might be applied.</li> </ul>
188	Method 3 - Regional Plans	Method 3 - Regional Plans	Amend	<ul style="list-style-type: none"> <li>Amend Method 3 to include the following:  <u>"Regional plans will implement Policies [X &amp; Y as set out in Fonterra's submission point 33 [point 38 in this summary document]] by:</u>  <u>a) identifying appropriate provisions to enable the operation and development of regionally significant industry;</u> </li> </ul>	<ul style="list-style-type: none"> <li>In the context of Fonterra's submissions seeking specific policy provision in respect of regionally significant industry, additional Methods need to be included within Method 3.</li> <li>Method 3.1.5 relates to Policy 2.3.3 and refers to the development of river management strategies. Fonterra's submission in relation to Policy 2.3.3 seeks amendments to give effect to the NPSFM. Accordingly, Method 3 requires an additional Method to explain how</li> </ul>

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				<p><u>b) maintaining and, where appropriate, enhancing access to natural and physical resources and recognising the benefits of regionally significant industry in the balancing of competing demands."</u></p> <ul style="list-style-type: none"> <li>Amend Method 3 to include the following: "To implement Policy 2.3.3, the Regional Plan will: a) <u>identify freshwater management units;</u> b) <u>identify the use and non-use values of each unit;</u> c) <u>establish freshwater objectives to achieve identified values;</u> d) <u>set limits to allow the freshwater objectives to be met;</u> e) <u>manage land use activities and discharges of contaminants to meet limits;</u> f) <u>determine timeframes and appropriate methods for the improvement of degraded freshwater management units;</u> g) <u>implement a-f above through community and industry stakeholder involvement."</u></li> </ul>	the policy is to be implemented in respect of the NPSFM.
192	Method 4 - City and District Plans	Method 4 - City and District Plans	Amend	<p>Amend Method 4 to include the following: "City or district plans will implement Policies [X &amp; Y as set out in Fonterra's submission point 33 [point 38 in this summary document]] by: a) <u>Identifying appropriate provisions, including zones, to enable the efficient operation and development of regionally significant industry, and the avoidance of reverse sensitivity effects;</u> b) <u>maintaining and, where appropriate, enhancing access to natural and physical resources and recognising the benefits of regionally significant industry in the balancing of competing demands;</u> c) <u>recognising and enabling the benefits of co-locating regionally significant industries and their supporting activities;</u> d) <u>managing urban growth and the subdivision of land to ensure the continued availability of highly versatile soils for primary production purposes."</u></p>	In the context of Fonterra's submissions seeking specific policy provision in respect of regionally significant industry, additional Methods need to be included within Method 4.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	<ul style="list-style-type: none"> <li>Delete Method 4.1.3.</li> <li>Delete Method 4.1.12 c).</li> </ul>	<ul style="list-style-type: none"> <li>Method 4.1.3 refers to the need for city or district plans to implement Policy 4.5.1. This Policy does not refer to Method 4.</li> <li>The RPS should focus on regionally significant issues, which does not necessitate specific provisions for, e.g. management of dust.</li> <li>4.1.12 seems unnecessary and indicates a lack of strategic direction. If urban growth boundaries are required to implement the policy framework of the PRPS they should either be defined through the current PRPS, or left to be determined by the relevant city of district council in the preparation of their city or district plan. It is not appropriate to signal or pre-empt the content of a future PRPS.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	<ul style="list-style-type: none"> <li>Amend Method 4.2.4 to delete reference to Policies 4.3.1 and 4.3.2, and add reference to Policy 3.8.3.</li> </ul>	<ul style="list-style-type: none"> <li>Method 4.2.4 does not seem relevant to the management of rural activities.</li> <li>Method 4.2.6b) could have significant effects on regionally significant</li> </ul>

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				<ul style="list-style-type: none"> <li>Delete Method 4.2.6b), or alternatively, identify the criteria and thresholds that will be used to determine where the approach might be applied.</li> </ul>	activities and investment.
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method 5 and associated references in the PRPS.	The PRPS should be a self-contained document clearly referencing the policy direction for lower order plan preparation. It is not appropriate to rely on, to signal or to pre-empt the content of a future regional policy statement.
199	Method 6 - Research, Monitoring and Reporting	Method 6.2 - Research	Amend	<p>Include an additional Method to Method 6.2.1 to read:</p> <p>"Regional Council will:</p> <p>...</p> <p><u>c) Research the amount of water available for allocation within the region, the rate or quantity currently allocated, the amount actually used and the cumulative effects of abstraction based on freshwater management units.</u></p> <p><u>d) Research and monitor the effects of discharges on people's health, on water quality and on ecosystems."</u></p>	<ul style="list-style-type: none"> <li>In the context of Policy 4.4.1, a new Method is required to state the regional council's intention to research matters relating to water abstraction and allocation.</li> <li>In the context of Fonterra's submissions in respect of Policy 4.5.1, a new Method is needed to explain the intention of the Regional Council to establish an evidential basis for assessment of the effects of discharges to land, air and water.</li> </ul>
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Amend	<p>Amend Method 7 to include an additional Method to read:</p> <p><u>"7.7 Freshwater Quality Regional, City and District Councils and Community and Industry stakeholders may:</u></p> <p><u>a) Develop and implement freshwater management strategies and plans to achieve freshwater quality objectives."</u></p>	In the context of the NPSFM and the amendments to Policy 2.3.3 sought through Fonterra's submission it is conceivable that the achievement of freshwater quality improvements will necessitate the use non-regulatory methods.
206	Method 7 - Strategies and Plans (non-RMA)	Method 7.3 - Regional Land Transport Plan	Amend	<ul style="list-style-type: none"> <li>Recast Methods 7.3.1 to 7.3.4 as specific PRPS policy.</li> <li>Amend Method 7.3 to refer to these additional policies and to new policies proposed by Fonterra in respect of regionally significant industry.</li> </ul>	While Method 7.3 references a series of relevant PRPS Policies, it sets out specific matters at 7.3.1 to 7.3.4 which appear to be more appropriately expressed as PRPS policy themselves. In particular, the Method refers to enabling increased freight efficiency.
249	Glossaries	Glossary	Amend	<p>Amend the Glossary to replicate the RMA definition of "contamination" and "contaminated land":</p> <p><u>"Contaminated land</u></p> <p><u>Land that has a hazardous substance in or on it that—</u></p> <p><u>a) has significant adverse effects on the environment; or</u></p> <p><u>b) is reasonably likely to have significant adverse effects on the environment</u></p> <p><u>and "contaminant" has the meaning set out in the Resource Management Act 1991"</u></p>	Additional references are required to explain that the PRPS adopts the RMA definition of "contamination" and "contaminated land".
249	Glossaries	Glossary	Amend	<p>Include the following definition:</p> <p><u>"Regionally significant industry</u></p> <p><u>An economic activity based on the use of natural and physical resources in the region and is identified in regional or district plans, which has been shown to have benefits that are significant at a regional or national scale."</u></p>	To reflect matters raised in Fonterra's submissions, an additional definition is required for the term "regionally significant industry".
249	Glossaries	Glossary	Amend	<p>Include the following definition:</p> <p><u>"Primary production activities</u></p>	To reflect matters raised in Fonterra's submissions, an additional definition is required for the term "primary production activities".

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<u>The commercial production of raw material and basic foods, which relies on the productive capacity of soil or water resources in the region. This includes the cultivation of land, animal husbandry/farming, horticulture, aquaculture, fishing, forestry, or viticulture. It does not include hobby farms, rural residential blocks, or land used for mineral extraction.</u>	
253	Other comments	Structure of the document & useability - general	Amend	Restructure the PRPS, including Part A – Introduction, so that it is structured around specific natural and physical resources or topics rather than outcomes.	Connection between four outcomes is unclear, and there is little direction on how to manage particular resources.
269	Objectives on high quality natural resources	Introduction to Objective 2.1	Amend	Amend the explanatory text to Objective 2.1 as follows: <del>"Some of the many values of our natural resources may conflict with each other: for example, we depend on water for food production, yet we want water for healthy rivers. Otago's biodiversity is an example of another resource under pressure, in part from indirect consequences of land use, such as the introduction and spread of pest species. A good quality resource management framework addresses all</del> <u>identifies the values that apply attached to our resources, and identifies those which need protection and the objectives that are sought to be met in respect of those values. Once identified, it is acknowledged that the values and objectives that apply to individual natural and physical resources may conflict with each other - example, we depend on water for food production, yet we want water for healthy rivers. A good quality resource management framework will take an integrated approach that attempts to balance competing values (and objectives) rather than preferring some at the exclusion of others."</u>	<ul style="list-style-type: none"> <li>• Amendments to explain the nature of the issues affecting physical and natural resources, how these issues will affect the management of the resource and the approach that is to be taken (that is consistent with, for example, the NPSFM).</li> <li>• Objective 2.1 focuses on "natural resources", with "physical resources" largely omitted.</li> <li>• Water is identified as a resource under pressure without explaining whether this relates to water quantity, quality or both.</li> <li>• Last sentence does not reflect the approach prescribed by the NPSFM of setting objectives for freshwater management through the identification and consideration of national and locally derived values.</li> <li>• The explanation should focus on the need for values and objectives to be identified prior to making reference to potentially conflicting values.</li> </ul>
270	Objectives on high quality natural resources	Introduction to Objective 2.2	Amend	Amend the introduction to Objective 2.2 (p. 32) to read: "Otago has many unique <u>and outstanding</u> landscapes, natural features and areas of indigenous biodiversity which are nationally or regionally important. Giving these a higher level of protection ensures they will be retained. <u>The use and development of natural and physical resources (including consumptive use) is to be preferred in other areas, while consumptive use of resources will be directed to areas where the</u> adverse effects are more acceptable."	<ul style="list-style-type: none"> <li>• Approach of protection and enhancement of resources that fall within the scope of section 6 of the Act is not warranted for resources of lesser importance.</li> <li>• Ensure that it is not just "consumptive" use of resources that is enabled for areas not otherwise covered by section 6 of the Act.</li> </ul>
272	Chapter B3 - Resilience, health and safety	Outcome 3 and introduction	Amend	Explain the necessity for regionally significant industries to have continued access to natural and physical resources, in terms of enabling people to continue to provide for their economic and social wellbeing in the explanatory text of Chapter 3 Outcome Statement (p.43) : "Otago is at risk of [...] economic, social,	<ul style="list-style-type: none"> <li>• Communities also face challenges in terms of access to resources to provide for their economic and social well-being.</li> <li>• Regionally significant industrial activities, and their associated demands and effects on natural and physical resources are key to enabling communities to provide for their social and economic wellbeing.</li> <li>• If the current structure is retained, the outcome requires amendment</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				cultural and environmental wellbeing. <u>Ensuring Otago's communities need to be maintained and develop[ed] in a resilient way</u> having regard to: a) <u>the need to have ongoing access to natural and physical resources (including ensuring communities and regionally significant industries are able to grow and develop);</u> b) <u>environmental constraints and the effects of activities on the environment;</u> and c) <u>the need for communities to be designed in way which helps us to prepare for, respond, recover and adapt to such disruptions, will help make Otago's communities resilient."</u>	to refer to the importance of providing for the continued operation and expansion of regionally significant industrial activities.
285	Objectives on resilience, health and safety	Introduction to Objective 3.4	Amend	Add the following paragraph to the introduction to Objective 3.4 as follows: "It is essential [...] by private companies. <u>The infrastructure requirements of the community also include infrastructure such as that associated with energy generation and industrial activities associated with food processing and primary production.</u> Local authorities [...] are being met."	The explanation to the objective focuses on "utilities" (water supply, waste water and stormwater). The requirement for infrastructure is much wider than this and extends to industrial activities associated with primary production.
286	Objectives on resilience, health and safety	Introduction to Objective 3.5	Amend	Amend the introduction to Objective 3.5 (p. 59) as follows: "Infrastructure of national and regional significance, including roads, rail, electricity generation and transmission, and telecommunications <u>and regionally significant industries associated with primary production (such as dairy processing)</u> are part of a national network, and contribute to the economic and social wellbeing of the nation..."	Focuses on "utilities" (water supply, waste water and stormwater). The requirement for infrastructure is wider, extending to regionally and nationally significant industry and industrial activities associated with primary production.

### 100 Otago Civil Defence Emergency Management Group

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	If the amendments requested are not implemented, the Proposed RPS be withdrawn.	Otago CDEM Group is strongly supportive of the approach taken to hazards in the Proposed RPS and considers the approach to be generally consistent with its vision of working together to build resilient communities in Otago.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Support	Retain the policy (or similar wording to achieve the intent).	<ul style="list-style-type: none"> <li>Policy appropriate in its intent, in particular it is important to set out the types of environmental constraints applicable in an area.</li> <li>It is appropriate that the exposure of activities to natural and technological risk is recognised.</li> </ul>
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate to seek to minimise the risk from natural hazards to communities.
80	Natural hazard risk	Policy suite 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Include policy and / or methods which will enable AER 3.1 to be measured including defining what significant natural hazard risk is.	<ul style="list-style-type: none"> <li>Strongly support the intent of AER 3.1, but the link between the policies, methods and indicators could be strengthened.</li> <li>Anticipated environmental result indicators require communities' tolerance to risks from natural hazards and climate change to be defined, and for areas of significant natural hazard risk to be identified.</li> <li>There is no policy or method requiring the assessment of communities' tolerance or vulnerability, or the definition of areas of</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					significant natural hazard risk.
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Support	Retain policy as notified (or similar wording to achieve desired relief).	It is appropriate to identify natural hazards present within the Otago region.
82	Natural hazard risk	Policy 3.2.2 - Assessing natural hazard likelihood	Support	Retain policy as notified (or similar wording to achieve desired relief).	<ul style="list-style-type: none"> <li>It is appropriate to assess the likelihood of natural hazard events occurring.</li> <li>Otago CDEM has analysed the level of various risks at a regional level. Otago has a complex hazardscape with a wide range of hazards. However, there are some gaps that require further scientific input and analysis.</li> </ul>
83	Natural hazard risk	Policy 3.2.3 - Assessing natural hazard consequence	Amend	Add the following clauses: " k) Ability to recover from hazard events; l) <u>Effects of climate change.</u> "	<ul style="list-style-type: none"> <li>It is appropriate that there is a policy requiring assessment of consequence.</li> <li>This assessment may play a role in determining the level of "significance" of hazard risk referred to in other policies.</li> <li>Policy would be strengthened by including assessment of ability to recover from natural hazard events and the effects of climate change.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Support	Retain policy as notified (or similar wording to achieve desired relief).	Support the requirement to assess activities for natural hazard risk.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend the policy to clarify its intent.	<ul style="list-style-type: none"> <li>Strongly support attempts to eliminate risks to human life and property from hazards where practicable, and reducing the magnitude of their impact and the likelihood of their occurring.</li> <li>It is unclear whether this policy seeks to avoid all activities that increase natural hazard risk, or just those that significantly increase the risk.</li> </ul>
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Support	Retain policy as notified (or similar wording to achieve desired relief).	Support this policy, as the reduction of risk is a key principle for managing hazards.
88	Natural hazard risk	Policy 3.2.8 - Applying a precautionary approach	Support	Retain policy as notified (or similar wording to achieve desired relief).	This will contribute to increasing the resilience of Otago's communities.
89	Natural hazard risk	Policy 3.2.9 - Protecting features and systems that provide hazard mitigation	Support	Retain policy as notified (or similar wording to achieve desired relief).	This will contribute to increasing the resilience of Otago's communities.
90	Natural hazard risk	Policy 3.2.10 - Mitigating natural hazards	Support	Retain policy as notified (or similar wording to achieve desired relief).	This will contribute to increasing the resilience of Otago's communities.
92	Objectives on resilience, health and safety	Objective 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Support	Retain policy as notified (or similar wording to achieve desired relief).	<ul style="list-style-type: none"> <li>Otago CDEM is concerned with climate change, in so far as it may lead to increased frequency and severity of emergency events.</li> <li>Will contribute to increasing the resilience of Otago's communities.</li> </ul>
96	Objectives on resilience, health and safety	Objective 3.4 - Good quality infrastructure and services meet community needs	Support	Retain policy as notified (or similar wording to achieve desired relief).	Good quality infrastructure and services that meet community needs contributes to communities' resilience to hazard events.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend the policy as follows: " iv. <u>Risks to natural hazard and technological hazards; and</u> ... vii. The effects of climate change <u>( on the likelihood and consequences of the risks of natural and technological hazards and threats) on the</u> long term viability of that infrastructure; and..."	Useful to add a reference to "risks of natural and technological hazards" and to clarify the effects of climate change.
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Support	Retain policy as notified (or similar wording to achieve desired relief).	<ul style="list-style-type: none"> <li>It is important to protect the functioning of lifeline utilities and essential or emergency services.</li> <li>The provisions of the CDEM Act in relation to lifeline utilities are noted.</li> </ul>
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Support	Retain policy as notified (or similar wording to achieve desired relief).	<ul style="list-style-type: none"> <li>Strongly supportive of the inclusion of "lifeline utilities" as part of the RPS.</li> <li>It is appropriate that the definition of lifeline utilities in the RPS refers</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					to the definition contained within the Civil Defence Emergency Management Act.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	Add the following clause (or similar wording to achieve desired relief): <u>" g) Provide for the development and ongoing use and maintenance of these measures, utilities and services. "</u>	<ul style="list-style-type: none"> <li>• Policy considered appropriate, subject to amendments to the definition of lifeline utilities.</li> <li>• The policy should provide for the development and ongoing use and maintenance of hazard mitigation measures, lifeline utilities and essential and emergency services within the region.</li> </ul>
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Support	Retain policy as notified (or similar wording to achieve desired relief).	Support this policy in so far as it provides further recognition of the regional and national significance of lifeline utilities.
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Support	Retain policy as notified (or similar wording to achieve desired relief).	Support the policy in so far as it seeks to "protect infrastructure".
107	Objectives on resilience, health and safety	Objective 3.6 - Energy supplies to Otago's communities are secure and sustainable	Support	Retain as notified or enhance if necessary to give effect to the National Policy Statement for Renewable Electricity Generation 2011 (or similar wording to achieve desired relief).	The security of energy supply during hazard events is essential for increasing the resilience of communities to such events.
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Support	Retain policy as notified (or similar wording to achieve desired relief).	<ul style="list-style-type: none"> <li>• Support policies which encourage communities to become self sufficient as this increases community resilience.</li> <li>• Small scale renewable electricity generation activities contribute to the self-sufficiency of communities.</li> </ul>
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Support	Retain policy as notified (or similar wording to achieve desired relief).	Support policies which seek to ensure the security of electricity supply.
112	Energy	Policy 3.6.4 - Enabling more efficient transport of electricity	Support	Retain policy as notified (or similar wording to achieve desired relief).	Support policies which seek to ensure the security of electricity supply.
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Support	Retain policy as notified (or similar wording to achieve desired relief).	Support policies which seek to ensure the security of electricity supply
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	Amend by adding g) as follows: <u>" g) Encourage design features that enable self sufficiency, such as home heating, on-site water supply and solar power. "</u>	<ul style="list-style-type: none"> <li>• Support policies which encourage communities to be self-sufficient.</li> <li>• It would be appropriate to encourage activities which contribute to the self-sufficiency of communities when considering urban design.</li> </ul>
119	Urban design	Policy 3.7.2 - Encouraging use of low impact design techniques	Support	Retain as notified (or similar wording to achieve desired relief).	Supports policy guidance which seeks to mitigate effects of natural hazards and climate change.
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Support	Retain as notified (or similar wording to achieve desired relief).	Warmer buildings contribute to the resilience of communities during hazard events.
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Support	Support.	<ul style="list-style-type: none"> <li>• Hazardous substance spills are a technological hazard identified in the Otago CDEM Group Plan.</li> <li>• Support seeking to reduce the risk associated with hazardous substances.</li> </ul>
129	Hazardous substances and waste	Policy suite 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Support	Seek clarification that the "transfer" of hazardous waste and waste materials includes the transportation of such substances.	<ul style="list-style-type: none"> <li>• Hazardous substance spills are a technological hazard identified in the Otago CDEM Group Plan.</li> <li>• Support seeking to reduce the risk associated with hazardous substances.</li> </ul>
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend policy to include the management of the transportation of hazardous substances.	<ul style="list-style-type: none"> <li>• Hazardous substance spills are a technological hazard identified in the Otago CDEM Group Plan.</li> <li>• Support seeking to reduce the risk associated with hazardous substances.</li> <li>• Seek clarification that the "transfer" of hazardous waste and waste materials includes the transportation of such substances.</li> </ul>
177	Roles and responsibilities	Roles and responsibilities	Amend	Amend to clarify that the "transport/transportation" of hazardous waste	<ul style="list-style-type: none"> <li>• Support the direction provided to Council's regarding their role in the management of natural hazards and hazardous substances.</li> </ul>



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				and waste materials includes the transfer of such substances.	<ul style="list-style-type: none"> <li>• Seek clarification that the roles relating to the "transport/transportation" of hazardous substances includes the "transfer" of these substances.</li> </ul>
178	Methods	Methods - general	Amend	Retain / include methods that give sufficient direction to Regional, City and District Councils so that the policies that promote the resilience of communities to the risks to natural and technological hazards will be given effect to.	<ul style="list-style-type: none"> <li>• In order for policies relating to "significant natural hazards" and "community vulnerability and sensitivity to natural hazards" to be achieved, assessments are required to be undertaken to determine what these are. Additional methods or direction within the existing methods are necessary to ensure this occurs.</li> <li>• There is no guidance in the methods regarding responsibility and tasks for ensuring resilience to technological hazards.</li> <li>• Support the direction and roles tasked to the various bodies, particularly: <ul style="list-style-type: none"> <li>• Method 2 as it related to the sharing of information;</li> <li>• Methods 3 &amp; 4 as they provide direction to regional, city and district councils on how natural hazards should be addressed in plans;</li> <li>• Method 6, as it outlines research, monitoring and reporting to be undertaken by local authorities;</li> <li>• Method 8, as it relates to education and information;</li> <li>• Method 11, as it relates to advocacy and facilitation.</li> </ul> </li> </ul>
204	Method 7 - Strategies and Plans (non-RMA)	Method 7.1 - Natural hazards strategies	Support	Retain method as notified (or similar wording to achieve desired relief).	<ul style="list-style-type: none"> <li>• It is appropriate that Regional, City and District Councils prepare these documents and develop community relevant responses to the impacts of natural hazards and climate change.</li> <li>• Otago CDEM is responsible for the Otago CDEM Group Plan which has been developed with the broad purpose to enable the efficient and effective management of regionally significant hazards and risks for which a coordinated regional approach will be required.</li> </ul>
237	Anticipated Environmental Results	AER 3.2 - The impact on life, property, lifeline utilities, and essential services from climate change is reduced in Otago	Amend	Amend the first indicator to set a benchmark and/or target to be achieved.	<ul style="list-style-type: none"> <li>• Support anticipated environmental result 3.2.</li> <li>• However, there is no existing benchmark, and the first indicator does not seek to achieve the stated outcome, it will simply state the number of subdivision and development consents granted in areas to be affected by sea level rise.</li> </ul>
238	Anticipated Environmental Results	AER 3.3 - Otago's infrastructure is safe, efficient and continues to operate through disruptive events	Support	Retain as notified (or similar wording to achieve the relief sought).	Strongly support this anticipated environmental result as a measure of Otago's resilience.
249	Glossaries	Glossary	Support	Retain the definitions of "climate change", "emergency services", "lifeline utilities", and "natural hazard".	<ul style="list-style-type: none"> <li>• Appropriate to refer to the definition in the CDEM Act in the definitions of "emergency services" and "lifeline utilities".</li> <li>• Definitions of "climate change" and "natural hazard" necessary for the comprehension of the provisions in the RPS.</li> </ul>
249	Glossaries	Glossary	Amend	Amend the definition of "Risk" to include a definition of technological hazard that is consistent with the National Plan 2015 (which is due to come into force in December).	<ul style="list-style-type: none"> <li>• A definition of technological risk is necessary for the comprehension of the provisions that relate to hazard risk.</li> <li>• The Otago CDEM Group Plan identifies the following technological hazards: lifeline utility failure, dam break, hazardous substance spill, major transport accident, criminal act/terrorism, human pandemic, animal/plant diseases and pests.</li> <li>• The definition of "risk" should be consistent with the CDEM Act (2002).</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	<ul style="list-style-type: none"> <li>• Such further or other relief as is appropriate or desirable.</li> <li>• Any consequential amendments.</li> </ul>	No reason given.

### 101 Bronna Brown

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Support	I support all references to the Treaty of Waitangi and all consultations with tangata whenua Ngai Tahu included in this document.	No reasons given.

### 102 Royalburn Farming Company Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	<ul style="list-style-type: none"> <li>Retention of all provisions as notified, except as requested in the submission.</li> </ul>	No reason given.
6	Overall approach	Schedule 3 - Significance threshold	Oppose	<ul style="list-style-type: none"> <li>Delete; or</li> <li>Amend so it is consistent with case law and insert new criteria to reflect the need to consider offsetting or compensation and to reflect environmental/planning context on a case-by-case basis, e.g.:               <ul style="list-style-type: none"> <li>11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly offset or otherwise compensated, and consequently reducing the significance of the effect.</li> <li>12. Environmental Context: The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</li> <li>13. Matters of national importance and national significance: The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA. The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS."</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>The S32 report does not evaluate Schedule 3.</li> <li>Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant.</li> <li>Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.</li> </ul>
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Amend	Amend as follows: "The principles of Te Tiriti o Waitangi are <u>identified and</u> taken into account in resource management decisions".	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	<p>Amend as follows: "Policy 1.1.2 <u>Identifying and</u> <del>F</del>aking the principles of Te Tiriti o Waitangi into account</p> <p>Ensure that local authorities <del>exercise their functions and powers, to</del> <u>take into account the principles of Te Tiriti o Waitangi identified in Appendix 1A by:</u></p> <ol style="list-style-type: none"> <li><del>Providing</del> <u>Accord</u> Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,</li> <li><del>Involve</del> <u>Involving</u> Kai Tahu in resource management decision-making processes and implementation; and</li> <li><del>Take</del> <u>Taking</u> into account Kai Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taoka ; and</li> <li><del>Ensure</del> <u>Ensuring</u> Kai Tahu have the prerogative to:           <ol style="list-style-type: none"> <li><del>Identify</del> <u>Identifying</u> their relationship with their ancestral lands, water, sites, wahi tapu,</li> </ol> </li> </ol>	Use wording of RMA Part 2.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				and other taoka; and ii. <del>Determine</del> <u>Determining</u> how best to express that relationship; and e) <del>Ensure</del> <u>Ensuring</u> Kai Tahu are able to exercise kaitiakitaka; and f) <del>Ensure</del> <u>Ensuring</u> that district and regional plans: i. <del>Give</del> <u>Giving</u> effect to the Ngai Tahu Claims Settlement Act 1998; and ii. <del>Recognise</del> <u>Recognising</u> and <del>provide</del> <u>providing</u> for statutory acknowledgement areas, as detailed in Schedule 2; and iii. <del>Provide</del> <u>Providing</u> for other areas in Otago that are recognised as significant to Kai Tahu in a manner similar to that prescribed for statutory acknowledgement areas."	
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Objective 1.2 Kai Tahu values, rights and interests and customary resources are <u>identified and</u> sustained."	No reason given.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) Ensuring <u>sustainable management of</u> resources supports <del>their</del> customary uses and cultural values (as detailed in Schedules 1A and B); and"	No reason given.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> , on those values and sites <del>, as detailed in Schedule 3;</del> and"	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<ul style="list-style-type: none"> <li>• Amend b) as follows: "b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and"</li> <li>• Delete c).</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Specify or identify "other cultural values" referred to in other parts of the RPS in Schedule 1A.	No reason given.
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	Amend Issue as follows: "Degradation of <u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time <del>will</del> <u>can</u> cause serious damage."	Regional issues include natural resource management issues.
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected <u>from inappropriate subdivision, use and development</u> ."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <del>Natural</del> <u>Environmental</u> systems <del>and resources</del> are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely affects the <u>environmental</u> value of another..."	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural <del>and physical</del> resources are recognised, <u>and protected from inappropriate subdivision, use and development</u> , <del>maintained and enhanced</del> ."	<ul style="list-style-type: none"> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to: ... c) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... j) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and k) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and l) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ... b) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and ... g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... g) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and h) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				...	
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend b) as follows: "b)Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those soils</u> , to: ... f) <del>Retain</del> <u>Ensure the primary use of regionally significant soil resources is</u> for primary production <u>purposes</u> ; and g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>, as identified in Schedule 1A</u> ; and ... k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Amend c) iii. as follows: "iii. Historical <del>and heritage</del> associations".	No reason given.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• As applies to all landscape assessments, including for "Special Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Add the following new policy: <u>"Managing cross boundary landscape effects Promote alignment of District Plans and integrated assessments of environmental effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries."</u>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries, which would benefit from a regionally integrated approach.</li> <li>• This proposed policy would be as effective as the provisions on Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: " <del>Protect and enhance</del> <u>Manage subdivision, use and development that affects</u> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects <del>on those values which contribute</del> <u>which will result in</u> to the area or habitat <u>losing its being significant status</u> ; and b) Avoiding significant adverse effects <u>from</u>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

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				<del>inappropriate subdivision, use and development</del> on other values of the area or habitat; and <del>-e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and ...</del>	
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes, <del>using the attributes as detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• These attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• Schedule 4 should be deleted</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: " <del>Protect, enhance and restore</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding natural features, landscapes and seascapes, by: a) Avoiding adverse effects <del>on those values which contribute to</del> <u>which will result in the loss of the</u> significance of the natural feature, landscape or seascape; and ... <del>-e) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and ...</del> <u>g) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values</u> <u>(h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate</u> ".	<ul style="list-style-type: none"> <li>• Could disrupt the balance of the values of outstanding natural landscapes and features and other important values.</li> <li>• For example, ski fields are appropriate to locate in alpine environments that may be considered outstanding natural landscapes.</li> <li>• Ensuring such businesses can continue to operate and provide an important recreational and economic resource to Otago should be borne in mind.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding, <del>using the attributes detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of different criteria being used in current or proposed district plans, and hence, creating inefficiencies and potentially slowing down forthcoming district plan reviews. These concerns also relation to Schedule 4.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social wellbeing of communities.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Amend as follows: " <del>Protect or enhance the values of</del> <u>Manage</u> special amenity landscapes and highly valued natural features, by: a) Avoiding <del>, remedying or mitigating significant</del> adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and <del>-b) Avoiding, remedying or mitigating other adverse effects on other values; and</del> c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del>	<ul style="list-style-type: none"> <li>• Level of protection not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it.</li> <li>• Better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category.</li> <li>• The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				... g) <u>Recognising and providing for the use of such resources including as places where productive activities, tourism, recreation, infrastructure, homes and work places are located.</u> h) <u>Allowing values to adapt over time as communities and economies change.</u> "	affected. • The practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend as follows: "Preserve or enhance the natural character values of the coastal environment, by: a) Avoiding adverse effects <u>of activities on natural character in areas of the coastal environment with</u> <del>on those values which contribute to the</del> outstanding natural character of an area; and b) Avoiding significant adverse effects <u>and avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment</u> <del>on those values which contribute to the high natural character values of an area;</del> and c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3;</del> and d) <del>Avoiding, remedying or mitigating other adverse effects on other values;</del> and..."	• The practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend as follows: " <del>Protect</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding water bodies and wetlands by: a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> , including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and ... <del>e) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> ..."	• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	Amend as follows: "Policy 2.2.14 Identifying <del>highly valued</del> <u>regionally significant</u> soil resources Identify areas and values of <del>highly valued</del> <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Amend as follows: "Policy 2.2.15 Managing <del>highly valued</del> <u>regionally significant</u> soil resources Protect the values of <del>areas of highly valued</del> <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on those values which contribute to the soil being <del>highly valued</del> <u>regionally significant</u> ; and ..."	• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region. • Schedule 3 criteria are inadequate (see submission on Schedule 3).

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				-c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and d) Recognising that <u>loss of regionally significant soils to urban expansion development</u> , may be appropriate <u>near</u> -due to location and proximity to existing urban development -, and <u>infrastructure</u> -particularly when there is a lack of supply of land available for urban development. "	
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend as follows: "Natural resource systems and their interdependencies are recognised"	No reason given.
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Add the following policy: " <u>Applying an integrated management approach for significant infrastructure and activities that affect significant infrastructure</u> <u>Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure, by:</u> a) Promoting consistent corridor management throughout the region. "	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>Amend a) as follows: "a) Taking into account the impacts of management of one resource on the <u>environmental</u> values of another, or on the environment in general; and"</li> <li>Add the following clauses: " <u>c) Ensuring that resource objectives are complementary across administrative boundaries; and</u> <u>d) Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete policy.	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
66	Objectives on resilience, health and safety	Issue 3.1 - Risk of overreaching the environment's carrying capacity	Amend	Amend as follows: "Activities that <u>utilise resources</u> -are undertaken- without regard to <u>their local</u> environmental values -are at greater risk <u>inappropriately compromising</u> -of overreaching that- <u>the</u> environment's ability to sustain the activity."	No reason given.
70	Objectives on resilience, health and safety	Issue 3.5 - Importance of infrastructure of regional or national significance	Amend	Amend as follows: " <u>It is important to recognise and provide for Significant Infrastructure</u> -of regional and national significance- <u>even though it</u> may result in <u>local</u> adverse environmental effects -impacts, or adversely affect other nationally important values..."	Significant infrastructure should be defined, recognised and provided for.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of <u>natural and physical</u> resources recognises environmental constraints".	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.



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78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising <del>natural and physical</del> environmental constraints Recognise the <del>natural and physical</del> environmental constraints of <u>resources</u> <del>an area</del> , the <u>environmental</u> effects of those constraints on activities <u>utilising those resources</u> , and the <u>environmental</u> effects of those activities on those constraints, <del>including with particular recognition of</del> : ... c) The sensitivity of <del>the natural and physical</del> resources to adverse effects from the proposed activity/land use; and ..."	No reason given.
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Amend Objective 3.2 as follows: " <u>Inappropriate</u> risk that natural hazards pose to Otago's communities are minimised"	Designing to a 100 year level may be appropriate, but it would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities <del>including hazards of low likelihood and high consequence</del> ."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows: "Manage natural hazard risk, <del>including</del> with <u>particular</u> regard to: a) The risk <del>they</del> posed, considering the likelihood and consequences of natural hazard events; and ..."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend 1st sentence as follows: "Assess activities <u>in areas known to be subject to an identified</u> <del>for</del> natural hazard risk, by considering:..."	No reason given.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Policy 3.2.6 Avoiding increased natural hazard risk <u>from inappropriate subdivision, use and development</u> Avoid <u>remedy or mitigate increased</u> <del>increasing</del> natural hazard risk <u>from inappropriate subdivision, use and development</u> , including by:..."	<ul style="list-style-type: none"> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• It would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).</li> </ul>
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend 1st sentence as follows: "Reduce existing natural hazard risk, <del>including particularly by</del> :"	No reason given.
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) There is significant <del>public or environmental</del> benefit in doing so; or b) The work relates to the functioning ability of <u>significant infrastructure</u> , <u>a lifeline utility</u> , or <u>facility used</u> for essential or emergency services, <u>or a significant community facility</u> ."	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ..."	<ul style="list-style-type: none"> <li>• Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>b) Designing infrastructure to take into account: ... iv. <del>Natural and physical</del> Resource constraints; and v. Effects on the values of natural and physical resources; and ... c) Managing urban growth <u>in a coordinated manner to ensure</u> :- i. <del>Within areas that have</del> sufficient infrastructure <u>services are provided</u> -capacity; or ii. <del>Where infrastructure services can be upgraded or extended</del> efficiently and effectively ; and d) <del>Co-ordinating the design and development of infrastructure with the staging of land use change, including with:</del> i. <del>Structural design and release of land for new urban development;</del> or ii. <del>Structural redesign and redevelopment within existing urban areas.</del> "</p>	<ul style="list-style-type: none"> <li>Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community costs than benefits in high growth areas.</li> <li>Regulation of the release of land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	<p>Amend as follows: "Manage infrastructure activities, to: ... b) <del>Reduce</del> <u>Avoid, remedy or mitigate</u> adverse effects of those activities, including cumulative adverse effects on <del>natural and physical</del> resources; and c) Support economic, social and community <del>needs</del> -activities; and d) Improve efficiency of use of <del>natural</del> resources; and e) Protect infrastructure corridors <u>from inappropriate subdivision, uses and development</u> <del>for infrastructure needs, now and for the future</del>; and ... g) Protect the functioning of <u>significant infrastructure</u> <del>lifeline utilities</del> and essential or emergency services."</p>	Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	<p>Amend as follows: "Policy 3.4.3 Designing <del>lifeline utilities</del> <u>significant infrastructure</u> and facilities for essential or emergency services Design <del>lifeline utilities</del> <u>significant infrastructure</u> , and facilities for essential or emergency services, to..."</p>	No reason given.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, <del>lifeline utilities</del>, <u>significant infrastructure</u>, and essential and emergency services".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	<p>Amend as follows: "<u>Significant</u> Infrastructure of <del>national and regional significance</del> <u>is recognised and provided for</u>, <del>managed in a</del></p>	Significant infrastructure should be defined, recognised and provided for.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend as follows: "Policy 3.5.1 Recognising <u>and providing for</u> national and regional significance of infrastructure Recognise <u>and provide for</u> the national and regional significance of the following infrastructure: a) Renewable electricity generation facilities <del>where they supply the national electricity grid and local distribution network</del> ; and ... f) Structures for transportation by rail <u>and tourism activities</u> ."	<ul style="list-style-type: none"> <li>• Significant infrastructure should be defined, recognised and provided for.</li> <li>• The PRPS does not give enough recognition of and provision for the tourism sector.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend as follows: "Policy 3.5.2 Managing adverse effects of <u>significant</u> infrastructure <del>that has national or regional significance</del> <del>Minimise</del> <u>Avoid, remedy or mitigate</u> adverse effects from <u>significant</u> infrastructure <del>that has national or regional significance</del> , by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in</del> ; ... b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding</del> <u>minimising</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and ... <del>d) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> e) <del>Considering</del> <u>Enabling infrastructure providers to employ</u> the use of offsetting <del>or</del> other compensatory measures <u>to address</u> <del>for</del> residual adverse effects on <u>the environment</u> <del>indigenous biodiversity</del> ."	<ul style="list-style-type: none"> <li>• Significant infrastructure should be defined, recognised and provided for.</li> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<ul style="list-style-type: none"> <li>• Amend header as follows: "Protecting <u>significant</u> infrastructure <del>of national or regional significance</del>".</li> <li>• Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>• Significant infrastructure should be defined, recognised and provided for.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	Amend as follows: "Policy 3.6.2 Promoting small <u>and community</u> scale renewable electricity generation Promote small <u>and community</u> scale renewable electricity generation activities that : a) Increase the local community's resilience and security of energy supply; and b) <del>Avoid, remedy or mitigate adverse effects from that activity</del> ."	No reason given.
111	Energy	Policy 3.6.3 - Protecting the	Amend	• Amend 1st sentence as follows: "Protect the	• The practicality of applying Schedule 3 efficiently is very

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		generation capacity of renewable electricity generation activities		generation capacity of <u>nationally or regionally significant</u> renewable electricity generation activities, by...". • Delete d).	questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	Amend as follows: • Delete d). • "e) Protecting <del>existing</del> distribution corridors for infrastructure needs, now and for the future."	• The practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	Amend as follows: "Encourage the use of good urban design principles in subdivision and development in urban areas, <del>as detailed in Schedule 6,</del> to: ... b) Ensure that the built form relates well to its <u>surrounding</u> <del>natural</del> environment, <del>including</del> by: i. <del>Reflecting natural features such as rivers, lakes, wetlands and topography;</del> and ii. <del>Providing for ecological corridors in urban areas;</del> and iii. <del>Protecting areas of indigenous biodiversity and habitat for indigenous fauna;</del> and iv. <del>Encouraging use of low impact design techniques;</del> and v. <del>Encouraging construction of warmer buildings</del> ; and ..."	• Schedule 6 not assessed in S32 report. • Likely that will add to existing assessment requirements (urban design protocol & matters set out in District Plans) for little added benefits. • May be to the detriment of good urban design for specific sites.
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete schedule.	• Schedule 6 not assessed in S32 report. • Likely that will add to existing assessment requirements (urban design protocol & matters set out in District Plans) for little added benefits. • May be to the detriment of good urban design for specific sites.
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend a) as follows: "a) <del>Maximising</del> <u>Optimising</u> passive solar gain; and"	No reason given.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend as follows: "Design <u>and maintain</u> public spaces, including streets and open spaces, to <u>provide for a range of uses and</u> meeting the reasonable access and mobility needs of all sectors within the community, <del>including the young and those with mobility impairments.</del> "	• Unnecessary or ambiguous ("including"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Amend as follows: "Policy 3.8.1 <del>Managing</del> <u>Providing</u> for urban growth <del>Manage</del> <u>Provide for</u> urban growth and creation of new urban land in a strategic and co-ordinated way, by: a) <u>Understanding demand and supply of</u> <del>Ensuring there is sufficient</del> residential, commercial and industrial <u>zoned</u> land capacity, <del>to</del> <u>and catering for that demand</u> <del>for such land, projected over at least the next 10 years;</del> and b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to:	• The section 32 analysis supporting urban growth boundaries is inadequate. • It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. • The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. • The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages. • Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.

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				<p>i. Provide infrastructure in an efficient and effective way; and</p> <p>ii. <del>Avoid- Discouraging additional costs on the public</del> that arise from unplanned infrastructure expansion; and</p> <p>c) Identifying future growth areas that:</p> <p>i. Minimise <u>significant</u> adverse effects on <del>rural the productivity of the rural and tourism sectors</del>, <del>including loss of highly valued soils or creating competing urban demand for water and other resources</del>; and</p> <p>ii. <u>Can be developed without resulting in significant adverse effects on any matter of national importance or national significance</u> <del>Maintain or enhance significant biodiversity, landscape or natural character values</del>; and</p> <p><del>iii. Maintain important cultural or heritage values</del>; and</p> <p><del>iv. iii.</del> Avoid land with significant risk from natural hazards <u>which cannot be remedied or mitigated</u>; and</p> <p>d) Considering the need for urban growth boundaries to control <u>potentially inappropriate</u> urban expansion; and</p> <p>e) Ensuring efficient use of land; and</p> <p>f) Requiring the use of low or no-emission heating systems in buildings, <del>when where</del> ambient air quality <del>in or near the growth area</del> is:</p> <p>i. Below standards for human health; or</p> <p>ii. Vulnerable to degradation given the local climatic and geographical context; and</p> <p>g) Giving effect to the principles of good urban design <del>as detailed in Schedule 6</del>; and</p> <p>h) Giving effect to the principles of crime prevention through environmental design</p>	<ul style="list-style-type: none"> <li>• Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community.</li> <li>• Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS.</li> <li>• “Considering the need for urban growth boundaries” should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential methods.</li> <li>• “Avoidance” of natural hazards needs to be widened to “avoid, remedy or mitigate”, which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	Delete the policy.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas</li> </ul>

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126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete schedule.	<p>are as defined in a District Plan.</p> <ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<p>Amend as follows: "Manage subdivision, use and development of rural land, to:</p> <p>a) Avoid <u>inappropriate</u> development or fragmentation of land, <u>particularly</u> which undermines or forecloses the potential of rural land:</p> <p>i. For primary production <u>or tourism</u> ; or ...</p> <p>b) Have particular regard to whether the proposal will result in a loss of the productive potential of <u>regionally significant</u> <del>highly versatile</del> soils, unless:</p> <p>i. The land adjoins an existing urban area and there is no other land suitable for urban expansion <u>, or there is a shortage of land available for urban development</u> ; and</p> <p>ii. <del>There highly versatile soils are needed for urban expansion,</del> any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and</p> <p>iii. reverse sensitivity effects on rural productive activities can be <u>satisfactorily</u> avoided; and</p> <p>c) Avoid unplanned demand for provision of <u>public</u> infrastructure <u>investment</u>, including domestic water supply and waste disposal; and</p> <p>d) Avoid creating <u>significant</u> competing demand for water <del>or other</del> resources."</p>	<ul style="list-style-type: none"> <li>The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> <li>The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk</u> <del>harm</del> human health or the quality of the environment <del>in Otago</del> ".	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend c) as follows: "c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and".	No reason given.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Amend a) as follows: "a) Prior to subdivision or development of potentially contaminated land,	No reason given.

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				requiring- <u>ensuring</u> a site investigation is undertaken to determine the nature or extent of any contamination; and"	
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Amend as follows: "Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably degrade natural values</u> ."	<ul style="list-style-type: none"> <li>• Avoiding the creation of new contaminated land may not always be appropriate or practical: in remediating contaminated land it may be appropriate to move soil to another location depending on where it is situated and how that land is to be used.</li> <li>• The emphasis should be on avoiding risks to human health or the environment.</li> </ul>
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	<ul style="list-style-type: none"> <li>• Add the following objective: "Significant industry activities and physical resources are provided for".</li> <li>• Add the following policy: "Recognising and providing for significant industry activities and physical resources Recognising and providing for significant industry activities and physical resources, by: a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety; b) Protecting significant industry activities from inappropriate subdivision, use, and development; c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated."</li> <li>• Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to: a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and cultural well-being; b) Protect significant industry activities from inappropriate subdivision, use, and development; c) Enable significant industry activities and development that does not have a significant adverse effect on the environment; d) Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance."</li> </ul>	Regionally Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Amend	Amend as follows: " <del>Sometimes, e</del> Existing businesses may be placed at risk by pressure to change- activities are susceptible to reverse sensitivity effects, particularly when land use	No reason given.

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				<del>changes to activities that may compete or conflict, creating reverse sensitivities.</del>	
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows: "Many <del>natural and physical</del> resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users."	No reason given.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend as follows: "Maintain and <del>where possible,</del> enhance public access to the natural environment, including to the coast, lakes, rivers and their margins, and areas of cultural or historic significance, unless restricting access is necessary to: ... b) Protect the <del>natural heritage and ecosystem</del> values of sensitive natural areas or habitats; or..."	No reason given.
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: " <del>Significant h</del> Historic heritage resources are recognised and contribute to the region's character and sense of identity".	No reason given.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: " <del>Manage historic heritage values to p</del> Protect <del>and enhance</del> the values of places and areas of historic heritage <u>from inappropriate development</u> , by: ... c) Avoiding <del>remedying or mitigating</del> adverse effects on those values which contribute to the area or place being of regional or national significance; and <del>d) Avoiding significant adverse effects on other values of areas and places of historic heritage; and</del> e) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> f) <del>Remediating, when adverse effects on other values cannot be avoided; and</del> g) <del>Mitigating when adverse effects on other values cannot be avoided or remediated; and</del> h) ..."	<ul style="list-style-type: none"> <li>• The PRPS does not correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows: <del>"Managing for rural- Protecting regionally significant industry activities from inappropriate subdivision, use and development</del> Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling <u>regionally significant industry activities</u> <del>, farming and other rural activities that support the rural economy;</del> and b) Minimising the loss of <u>regionally significant</u> soils <del>highly valued for their versatility for primary production;</del> and c) Restricting the establishment of activities <del>in rural areas</del> that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u> ; and d) <del>Minimising</del> Restricting the subdivision of	<ul style="list-style-type: none"> <li>• Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.</li> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> </ul>



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				productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and e) Providing for other activities that have a functional need to locate in rural areas <del>including tourism and recreational activities that are of a nature and scale compatible with rural activities.</del> "	
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Amend	Amend as follows: "Recognising <del>and providing for</del> the values of Otago's central business districts Recognise <del>and provide for</del> the values of Otago's central business districts, including as the primary focal point for social, cultural and economic activities within a community."	No reason given.
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	Amend as follows: "Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of <del>the</del> <u>Otago's</u> central business districts and support local commercial needs, by: a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and ... c) Avoiding unplanned extension of commercial activities that has significant adverse effects on <del>the</del> <u>a</u> central business district, including on the efficient use of infrastructure, employment and services; and ..."	No reason given.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	Amend as follows: "Manage the finite nature of land suitable and available for industrial activities, by: a) Providing specific areas to accommodate <del>the effects of</del> industrial activities; and b) Providing a range of land suitable for different industrial activities <del>including land extensive activities</del> ; and c) Restricting the establishment of activities in industrial areas that may result in: i. Reverse sensitivity effects <u>on industrial activities</u> ; or ii. Inefficient use of industrial land or infrastructure."	No reason given.
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend as follows: "Managing locational needs for mineral and gas exploration, extraction and processing Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Giving preference to avoiding their location in</del> <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> :	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>i. ...</p> <p>b) Restricting the establishment of <del>these</del> activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities.</u>"</p>	
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	<p>Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by:</p> <p>a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in:</del></p> <p>...</p> <p><del>e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and;</del></p> <p>...</p> <p>g) Considering the use of offsetting, or compensatory measures, <u>to address for</u> residual adverse effects <u>on the environment</u>; and</p> <p>..."</p>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	<p>Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values <del>, only</del> when:</p> <p>a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and</p> <p>b) Those <u>adverse</u> effects cannot be avoided, remedied or mitigated; and</p> <p>c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."</p>	<ul style="list-style-type: none"> <li>• The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection.</li> <li>• Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	<p>Amend as follows:</p> <p><del>"Providing for offsetting for from adverse effects on</del> indigenous biodiversity</p> <p>Provide for offsetting <del>for from adverse effects</del> on indigenous biodiversity, when <del>it is enabled,</del> <u>by ensuring that:</u></p> <p>a) The offset achieves no net loss <del>and preferably a net gain</del> in indigenous biodiversity values; and</p> <p>b) The offset is undertaken close to the location of development <del>, where this will result in the best ecological outcome; and...</del>"</p>	No reason given.
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	<p>Add the following method: "1.1.4 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</p>	No reason given.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<ul style="list-style-type: none"> <li>• Amend Method 1.2.1 as follows: "Identify <u>and</u> protect <u>from inappropriate subdivision, use and development,</u> places, areas or landscapes of cultural, spiritual or traditional significance to them;".</li> <li>• Amend Method 1.2.2 as follows: "Identify, and</li> </ul>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.

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				protect <u>from inappropriate subdivision, use and development</u> , the values that contribute to their significance;". • Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."	
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Oppose	Delete Method 1.4.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Oppose	Delete Method 2.2	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Oppose	Delete Method 2.3.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting <u>from inappropriate subdivision, use and development</u> , historic heritage places <u>or</u> areas <del>or landscapes</del> located in the beds of rivers, lakes and wetlands or the coastal marine area;"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.12.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7.	<ul style="list-style-type: none"> <li>• Efficiency gains in removing unnecessary provisions.</li> <li>• Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>• Unnecessary or ambiguous ("may").</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend Method 4.2.1 as follows: "City or district councils will implement Policies 3.2.2 and 3.2.3 <u>to the extent applicable</u> when undertaking natural hazard assessments".	No reason given.
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• There would be significant inefficiencies in detailing growth</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend Method 6.1.2 as follows: "Regional, city and district councils, in their areas of responsibility, will identify: <ul style="list-style-type: none"> <li>...</li> <li>d) <del>Special amenity landscapes;</del></li> <li>...</li> <li><u>g) Regionally significant soil resources;</u></li> <li><u>h) Significant infrastructure;</u>"</li> </ul>	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. Too high a level of protection could have adverse effects on the economic and social wellbeing of communities.</li> <li>• Significant infrastructure should be defined, recognised and provided for.</li> </ul>
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Oppose	Delete Method 7.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
211	Method 8 - Education and Information	Method 8.1.1 - Information from regional, district and city councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
214	Method 8 - Education and Information	Method 8.1.4 - Information from city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
215	Method 9 - Funding	Method 9 - Funding	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
220	Method 11 - Advocacy and Facilitation	Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional	Oppose	Delete Methods.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Amend d) as follows: <p>"d) Facilitate coordination between <del>lifeline utilities - significant infrastructure and significant community facilities used</del> for emergency management, including by:</p> <p>i) Recognising the interconnections between <del>significant infrastructure - lifeline utilities;...</del>"</p>	No reason given.
225	Method 11 - Advocacy and Facilitation	Method 11.2.3 - Facilitation by regional, city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
248	Appendices	Appendices - general	Oppose	<ul style="list-style-type: none"> <li>• Delete Appendix 1.</li> <li>• Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS.</li> </ul>	<ul style="list-style-type: none"> <li>• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and</li> <li>• Is not required by RMA S62 or is not an active directive.</li> </ul>
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>• Add the following definitions: <ul style="list-style-type: none"> <li>• Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance;</li> <li>• Significant Community Facility - include facilities that provide essential community services; <ul style="list-style-type: none"> <li>• Urban;</li> <li>• Regionally Significant Soil Resource - include all soil resources intended to be</li> </ul> </li> </ul> </li> </ul>	To reduce ambiguity and enable more efficient implementation of the PRPS.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				managed by the PRPS; <ul style="list-style-type: none"> <li>Regionally Significant Industry Activity - include any activity associated with tourism or primary production;</li> <li>Hard mitigation measures;</li> <li>Amend definition of Kai Tahu to clarify if has the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning documents outside Otago.</li> </ul>	
250	Glossaries	Glossary of Te Reo terms	Oppose	Delete and include these terms in the Glossary.	Unnecessary to have 2 separate glossaries.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Delete or amend text that: <ul style="list-style-type: none"> <li>Is duplicated;</li> <li>Is vague or ambiguous;</li> <li>Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation;</li> <li>Is not required by RMA S62 or is not an active directive; and</li> <li>Delete all "need" statements.</li> </ul>	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>"Need" statements are not required by RMA S62 or is not an active directive.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	Any consequential or other amendments required to give effect, or like effect, to any matter raised in the submission.	No reason given.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Retention of all provisions as notified, except as requested in the submission.	No reason given.
6	Overall approach	Schedule 3 - Significance threshold	Oppose	<ul style="list-style-type: none"> <li>Delete; or</li> <li>Amend so it is consistent with case law and insert new criteria to reflect the need to consider offsetting or compensation and to reflect environmental/planning context on a case-by-case basis, e.g.: <ul style="list-style-type: none"> <li>11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly offset or otherwise compensated, and consequently reducing the significance of the effect.</li> <li>12. Environmental Context: The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</li> <li>13. Matters of national importance and national significance: The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA. The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS."</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>The S32 report does not evaluate Schedule 3.</li> <li>Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant.</li> <li>Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.</li> </ul>
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into	Amend	Amend as follows: "The principles of Te Tiriti o Waitangi are <u>identified and</u> taken into account	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		account in resource management decisions		in resource management decisions".	
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	Amend as follows: "Policy 1.1.2 <u>Identifying and</u> <del>Faking</del> the principles of Te Tiriti o Waitangi into account Ensure that local authorities <del>exercise their functions and powers, to</del> <u>take into account the principles of Te Tiriti o Waitangi identified in Appendix 1A by:</u> a) <u>Providing</u> <del>Accord</del> Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and, b) <del>Involve</del> <u>Involving</u> Kai Tahu in resource management decision-making processes and implementation; and c) <del>Take</del> <u>Taking</u> into account Kai Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taoka ; and d) <del>Ensure</del> <u>Ensuring</u> Kai Tahu have the prerogative to: i. <del>Identify</del> <u>Identifying</u> their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and ii. <del>Determine</del> <u>Determining</u> how best to express that relationship; and e) <del>Ensure</del> <u>Ensuring</u> Kai Tahu are able to exercise kaitiakitaka; and f) <del>Ensure</del> <u>Ensuring</u> that district and regional plans: i. <del>Give</del> <u>Giving</u> effect to the Ngai Tahu Claims Settlement Act 1998; and ii. <del>Recognise</del> <u>Recognising</u> and <del>provide</del> <u>providing</u> for statutory acknowledgement areas, as detailed in Schedule 2; and iii. <del>Provide</del> <u>Providing</u> for other areas in Otago that are recognised as significant to Kai Tahu in a manner similar to that prescribed for statutory acknowledgement areas."	Use wording of RMA Part 2.
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Objective 1.2 Kai Tahu values, rights and interests and customary resources are <u>identified and</u> sustained."	No reason given.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) Ensuring <u>sustainable management of</u> resources supports <del>their</del> customary uses and cultural values (as detailed in Schedules 1A and B); and"	No reason given.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> on those values and sites <del>, as detailed in Schedule 3;</del> and"	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<ul style="list-style-type: none"> <li>Amend b) as follows: "b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and"</li> <li>Delete c).</li> </ul>	<ul style="list-style-type: none"> <li>Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Specify or identify "other cultural values" referred to in other parts of the RPS in Schedule 1A.	No reason given.
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	Amend Issue as follows: "Degradation of <u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time <del>will</del> <u>can</u> cause serious damage."	Regional issues include natural resource management issues.
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected <u>from inappropriate subdivision, use and development</u> ."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <del>Natural</del> <u>Environmental</u> systems <u>and resources</u> are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely affects the <u>environmental</u> value of another..."	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural <del>and physical</del> resources are recognised, <u>and protected from inappropriate subdivision, use and development</u> , <del>maintained and enhanced</del> ."	<ul style="list-style-type: none"> <li>Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to: ... c) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... j) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and k) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and l) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and	<ul style="list-style-type: none"> <li>Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>The PRPS should be focused on resource management issues of regional significance.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ... b) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and ... g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... g) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and h) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend b) as follows: "b) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those</u> soils, to: ... f) <del>Retain</del> <u>Ensure the primary use of regionally significant soil resources is for primary production purposes</u> ; and g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and ... k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
37	Natural resource value	Policy 2.1.7 - Recognising the	Amend	Amend c) iii. as follows: "iii. Historical <del>and</del>	No reason given.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	management - general	values of natural features, landscapes and seascapes		heritage- associations".	
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• As applies to all landscape assessments, including for "Special Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Add the following new policy: <u>"Managing cross boundary landscape effects Promote alignment of District Plans and integrated assessments of environmental effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries."</u>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries, which would benefit from a regionally integrated approach.</li> <li>• This proposed policy would be as effective as the provisions on Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: " <del>Protect and enhance Manage subdivision, use and development that affects</del> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects <del>on those values which contribute - which will result in</del> to the area or habitat <del>losing its -being- significant status</del> ; and b) Avoiding significant adverse effects <del>from inappropriate subdivision, use and development</del> on other values of the area or habitat; and <del>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and ..."</del>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes <del>, using the attributes as detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• These attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• Schedule 4 should be deleted</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: " <del>Protect, enhance and restore- Manage subdivision, use and development that affects</del> the values of outstanding natural features, landscapes and seascapes, by: a) Avoiding adverse effects <del>on those values which contribute to - which will result in</del> the <del>loss of the</del> significance of the natural feature, landscape or seascape; and ... <del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and ...</del> <u>q) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values</u> <u>(h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse</u>	<ul style="list-style-type: none"> <li>• Could disrupt the balance of the values of outstanding natural landscapes and features and other important values.</li> <li>• For example, ski fields are appropriate to locate in alpine environments that may be considered outstanding natural landscapes.</li> <li>• Ensuring such businesses can continue to operate and provide an important recreational and economic resource to Otago should be borne in mind.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<u>effects rather than avoiding them may be appropriate</u> ".	
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding, <del>using the attributes detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>Concerned about introducing the term of Special Amenity Landscapes.</li> <li>Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of different criteria being used in current or proposed district plans, and hence, creating inefficiencies and potentially slowing down forthcoming district plan reviews. These concerns also relation to Schedule 4.</li> <li>Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social wellbeing of communities.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Amend as follows: " <del>Protect or enhance the values of:</del> <u>Manage</u> special amenity landscapes and highly valued natural features, by: a) <del>Avoiding, remedying or mitigating significant adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and</del> <del>b) Avoiding, remedying or mitigating other adverse effects on other values; and</del> c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> ... <u>g) Recognising and providing for the use of such resources including as places where productive activities, tourism, recreation, infrastructure, homes and work places are located.</u> <u>h) Allowing values to adapt over time as communities and economies change.</u> "	<ul style="list-style-type: none"> <li>Level of protection not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it.</li> <li>Better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment.</li> <li>Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category.</li> <li>The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely affected.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend as follows: "Preserve or enhance the natural character values of the coastal environment, by: a) <del>Avoiding adverse effects of activities on natural character in areas of the coastal environment with, on those values which contribute to the</del> outstanding natural character of an area; and b) <del>Avoiding significant adverse effects and</del> <u>avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment</u> <del>on those values which contribute to the high natural character values of an area; and</del> c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> d) <del>Avoiding, remedying or mitigating other adverse effects on other values; and...</del> "	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend as follows: " <del>Protect</del> <u>Manage</u> <del>subdivision, use and development that affects</del> the values of outstanding water bodies and wetlands by:	<ul style="list-style-type: none"> <li>Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>The practicality of applying Schedule 3 efficiently is very</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> , including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and</p> <p>...</p> <p>-c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</p> <p>..."</p>	<p>questionable.</p> <ul style="list-style-type: none"> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	<p>Amend as follows:</p> <p>"Policy 2.2.14 Identifying <del>highly valued</del> <u>regionally significant</u> soil resources</p> <p>Identify areas and values of <del>highly valued</del> <u>regionally significant</u> soil resources, using the following criteria:</p> <p>..."</p>	No reason given.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	<p>Amend as follows:</p> <p>"Policy 2.2.15 Managing <del>highly valued</del> <u>regionally significant</u> soil resources</p> <p>Protect the values of <del>areas of highly valued</del> <u>regionally significant</u> soil resources, by:</p> <p>a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on those values which contribute to the soil being <del>highly valued</del> <u>regionally significant</u>; and</p> <p>...</p> <p>-c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</p> <p>d) Recognising that <u>loss of regionally significant soils to urban expansion development</u> may be appropriate <u>near</u> <del>due to location and proximity to</del> existing urban development <del>and infrastructure</del> <u>particularly when there is a lack of supply of land available for urban development</u>."</p>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend as follows: " <del>Natural resource s</del> Systems and their interdependencies are recognised"	No reason given.
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Amend	<p>Add the following policy:</p> <p>"<u>Applying an integrated management approach for significant infrastructure and activities that affect significant infrastructure</u></p> <p><u>Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure, by:</u></p> <p>a) <u>Promoting consistent corridor management throughout the region.</u>"</p>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>• Amend a) as follows: "a) Taking into account the impacts of management of one resource on the <u>environmental</u> values of another, or on the environment in general; and"</li> <li>• Add the following clauses: " c) <u>Ensuring that resource objectives are complementary across administrative boundaries; and</u></li> </ul>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				d) Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units."	
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete policy.	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
66	Objectives on resilience, health and safety	Issue 3.1 - Risk of overreaching the environment's carrying capacity	Amend	Amend as follows: "Activities that <u>utilise resources</u> <del>-are undertaken-</del> without regard to their <del>local-</del> <u>environmental values</u> <del>-are at greater risk</del> <u>inappropriately compromising</u> <del>-of overreaching that-</del> <u>the environment's ability to sustain the activity.</u> "	No reason given.
70	Objectives on resilience, health and safety	Issue 3.5 - Importance of infrastructure of regional or national significance	Amend	Amend as follows: " <u>It is important to recognise and provide for Significant Infrastructure</u> <del>-of regional and national significance-</del> <u>even though it may result in</u> <del>local-</del> <u>adverse environmental effects</u> <del>-impacts, or adversely affect other nationally important values...</del> "	Significant infrastructure should be defined, recognised and provided for.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of <del>natural and physical</del> resources recognises environmental constraints".	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising <del>natural and physical</del> environmental constraints Recognise the <del>natural and physical</del> environmental constraints of <u>resources</u> <del>-an area,</del> the <u>environmental</u> effects of those constraints on activities <u>utilising those resources</u> , and the <u>environmental</u> effects of those activities on those constraints, <del>including with particular recognition of</del> : ... c) The sensitivity of <del>the natural and physical</del> resources to adverse effects from the proposed activity/land use; and ..."	No reason given.
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Amend Objective 3.2 as follows: " <u>Inappropriate</u> risk that natural hazards pose to Otago's communities are minimised"	Designing to a 100 year level may be appropriate, but it would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities <del>including hazards of low likelihood and high consequence.</del> "	<ul style="list-style-type: none"> <li>Unnecessary ("including").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows: "Manage natural hazard risk, <del>including</del> with <u>particular</u> regard to: a) The risk <del>they</del> posed, considering the likelihood and consequences of natural hazard events; and ..."	<ul style="list-style-type: none"> <li>Unnecessary ("including").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend 1st sentence as follows: "Assess activities <u>in areas known to be subject to an</u>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<del>identified</del> -for- natural hazard risk, by considering:..."	
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Policy 3.2.6 Avoiding increased natural hazard risk <del>from inappropriate subdivision, use and development</del> Avoid <del>remedy or mitigate increased increasing</del> natural hazard risk <del>from inappropriate subdivision, use and development</del> , including by:..."	<ul style="list-style-type: none"> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• It would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).</li> </ul>
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend 1st sentence as follows: "Reduce existing natural hazard risk, <del>including particularly by:</del> ."	No reason given.
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) There is significant <del>public or environmental</del> benefit in doing so; or b) The work relates to the functioning ability of <del>significant infrastructure, a lifeline utility, or facility used</del> for essential or emergency services <del>, or a significant community facility."</del>	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ... b) Designing infrastructure to take into account: ... iv. <del>Natural and physical</del> Resource constraints; and v. Effects on the values of natural and physical resources; and ... c) Managing urban growth <u>in a coordinated manner to ensure</u> : i. <del>Within areas that have</del> sufficient infrastructure <u>services are provided</u> <del>capacity</del> ; or ii. <del>Where infrastructure services can be upgraded or extended</del> efficiently and effectively ; and d) <del>Co-ordinating the design and development of infrastructure with the staging of land use change, including with:</del> i. <del>Structural design and release of land for new urban development;</del> or ii. <del>Structural redesign and redevelopment within existing urban areas."</del>	<ul style="list-style-type: none"> <li>• Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community costs than benefits in high growth areas.</li> <li>• Regulation of the release of land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend as follows: "Manage infrastructure activities, to: ... b) <del>Reduce</del> <u>Avoid, remedy or mitigate</u> adverse effects of those activities, including cumulative adverse effects on <del>natural and physical</del> resources; and c) Support economic, social and community <del>needs</del> <del>activities</del> ; and	Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.

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				d) Improve efficiency of use of <del>natural</del> resources; and e) Protect infrastructure corridors <u>from inappropriate subdivision, uses and development</u> for infrastructure needs, now and for the future; and ... g) Protect the functioning of <u>significant infrastructure</u> <del>lifeline utilities</del> and essential or emergency services."	
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend as follows: "Policy 3.4.3 Designing <del>lifeline utilities</del> <u>significant infrastructure</u> and facilities for essential or emergency services Design <del>lifeline utilities</del> <u>significant infrastructure</u> , and facilities for essential or emergency services, to:..."	No reason given.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	• Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, <del>lifeline utilities</del> , <u>significant infrastructure</u> , and essential and emergency services". • Delete d).	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend as follows: " <u>Significant</u> Infrastructure of <del>national and regional significance</del> is <u>recognised and provided for</u> <del>managed in a sustainable way</del> ."	Significant infrastructure should be defined, recognised and provided for.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend as follows: "Policy 3.5.1 Recognising <u>and providing for</u> <del>national and regional</del> significance of infrastructure Recognise <u>and provide for</u> the <del>national and regional</del> significance of the following infrastructure: a) Renewable electricity generation facilities <del>where they supply the national electricity grid and local distribution network</del> ; and ... f) Structures for transportation by rail <u>and tourism activities</u> ."	<ul style="list-style-type: none"> <li>• Significant infrastructure should be defined, recognised and provided for.</li> <li>• The PRPS does not give enough recognition of and provision for the tourism sector.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend as follows: "Policy 3.5.2 Managing adverse effects of <u>significant</u> infrastructure <del>that has national or regional significance</del> <del>Minimise</del> <u>Avoid, remedy or mitigate</u> adverse effects from <u>significant</u> infrastructure <del>that has national or regional significance</del> , by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in</del> : ... b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding</del> <u>minimising</u> significant adverse effects on those values that contribute to the significant or	<ul style="list-style-type: none"> <li>• Significant infrastructure should be defined, recognised and provided for.</li> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

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				outstanding nature of those areas; and ... -d) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and e) <del>Considering</del> <u>Enabling infrastructure providers to employ</u> the use of offsetting, or other compensatory measures <u>to address</u> , for residual adverse effects on <u>the environment indigenous biodiversity</u> ."	
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Protecting <u>significant</u> infrastructure <del>of national or regional significance</del>".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	Amend as follows: "Policy 3.6.2 Promoting small <u>and community</u> scale renewable electricity generation Promote small <u>and community</u> scale renewable electricity generation activities that : a) <del>Increase the local community's resilience and security of energy supply;</del> and b) <del>Avoid, remedy or mitigate adverse effects from that activity.</del> "	No reason given.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	<ul style="list-style-type: none"> <li>Amend 1st sentence as follows: "Protect the generation capacity of <u>nationally or regionally significant</u> renewable electricity generation activities, by...".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	Amend as follows: <ul style="list-style-type: none"> <li>Delete d).</li> <li>"e) Protecting <del>existing</del> distribution corridors for infrastructure needs, now and for the future."</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	Amend as follows: "Encourage the use of good urban design principles in subdivision and development in urban areas <del>as detailed in Schedule 6</del> , to: ... b) Ensure that the built form relates well to its <u>surrounding</u> <del>natural</del> environment <del>, including by:</del> i. <del>Reflecting natural features such as rivers, lakes, wetlands and topography;</del> and ii. <del>Providing for ecological corridors in urban areas;</del> and iii. <del>Protecting areas of indigenous biodiversity and habitat for indigenous fauna;</del> and iv. <del>Encouraging use of low impact design techniques;</del> and v. <del>Encouraging construction of warmer buildings</del> ; and ..."	<ul style="list-style-type: none"> <li>Schedule 6 not assessed in S32 report.</li> <li>Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>May be to the detriment of good urban design for specific sites.</li> </ul>
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>Schedule 6 not assessed in S32 report.</li> <li>Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added</li> </ul>

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					benefits. • May be to the detriment of good urban design for specific sites.
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend a) as follows: "a) <del>Maximising</del> <u>Optimising</u> passive solar gain; and"	No reason given.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend as follows: "Design <u>and maintain</u> public spaces, including streets and open spaces, to <u>provide for a range of uses and</u> meeting the reasonable access and mobility needs of all sectors within the community, <del>including the young and those with mobility impairments.</del> "	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	<p>Amend as follows:</p> <p>"Policy 3.8.1 <del>Managing</del> <u>Providing</u> for urban growth</p> <p><del>Manage</del> <u>Provide for</u> urban growth and creation of new urban land in a strategic and co-ordinated way, by:</p> <p>a) <u>Understanding demand and supply of</u> <del>Ensuring there is sufficient</del> residential, commercial and industrial <u>zoned</u> land capacity, to <u>and catering for that demand for</u> such land, <del>projected over at least the next 10 years</del>; and</p> <p>b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to:</p> <p>i. Provide infrastructure in an efficient and effective way; and</p> <p>ii. <del>Avoid</del> <u>Discouraging</u> additional costs <u>on the public</u> that arise from unplanned infrastructure expansion; and</p> <p>c) Identifying future growth areas that:</p> <p>i. Minimise <u>significant</u> adverse effects on <del>rural</del> <u>the productivity of the rural and tourism sectors</u>, <del>including loss of highly valued soils or creating competing urban demand for water and other resources</del>; and</p> <p>ii. <u>Can be developed without resulting in significant adverse effects on any matter of national importance or national significance</u> <del>Maintain or enhance significant biodiversity, landscape or natural character values</del>; and</p> <p>iii. <u>Maintain important cultural or heritage values</u>; and</p> <p><del>iv. iii.</del> Avoid land with significant risk from natural hazards <u>which cannot be remedied or mitigated</u>; and</p> <p>d) Considering the need for urban growth boundaries to control <u>potentially inappropriate</u> urban expansion; and</p> <p>e) Ensuring efficient use of land; and</p> <p>f) Requiring the use of low or no-emission heating systems in buildings, <del>when</del> <u>where</u> ambient air quality <del>in or near the growth area</del> is:</p> <p>i. Below standards for human health; or</p> <p>ii. Vulnerable to degradation given the local</p>	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community.</li> <li>• Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS.</li> <li>• "Considering the need for urban growth boundaries" should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential methods.</li> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>



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				climatic and geographical context; and g) Giving effect to the principles of good urban design - as detailed in Schedule 6; and h) Giving effect to the principles of crime prevention through environmental design	
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	Delete the policy.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend as follows: "Manage subdivision, use and development of rural land, to: a) Avoid <u>inappropriate</u> development or fragmentation of land <u>particularly</u> which undermines or forecloses the potential of rural land: i. For primary production <u>or tourism</u> ; or ... b) Have particular regard to whether the proposal will result in a loss of the productive potential of <u>regionally significant</u> <del>highly versatile</del> soils, unless: i. The land adjoins an existing urban area and there is no other land suitable for urban	<ul style="list-style-type: none"> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>

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				expansion <u>, or there is a shortage of land available for urban development</u> ; and ii. <del>There highly versatile soils are needed for urban expansion,</del> any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and iii. reverse sensitivity effects on rural productive activities can be <u>satisfactorily</u> avoided; and c) Avoid unplanned demand for provision of <u>public infrastructure investment</u> , including domestic water supply and waste disposal; and d) Avoid creating <u>significant</u> competing demand for water <del>or other</del> resources."	
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk</u> <del>harm</del> human health or the quality of the environment <del>in Otago</del> ".	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend c) as follows: "c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and".	No reason given.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Amend a) as follows: "a) Prior to subdivision or development of potentially contaminated land, <u>requiring</u> <del>ensuring</del> a site investigation is undertaken to determine the nature or extent of any contamination; and"	No reason given.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Amend as follows: "Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably degrade natural values</u> ".	<ul style="list-style-type: none"> <li>• Avoiding the creation of new contaminated land may not always be appropriate or practical: in remediating contaminated land it may be appropriate to move soil to another location depending on where it is situated and how that land is to be used.</li> <li>• The emphasis should be on avoiding risks to human health or the environment.</li> </ul>
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	<ul style="list-style-type: none"> <li>• Add the following objective: "Significant industry activities and physical resources are provided for".</li> <li>• Add the following policy: "Recognising and providing for significant industry activities and physical resources Recognising and providing for significant industry activities and physical resources, by: a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety; b) Protecting significant industry activities from inappropriate subdivision, use, and development; c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or</li> </ul>	Regionally Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				mitigated." • Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to: a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and cultural well-being; b) Protect significant industry activities from inappropriate subdivision, use, and development; c) Enable significant industry activities and development that does not have a significant adverse effect on the environment; d) Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance."	
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Amend	Amend as follows: " <del>Sometimes, existing businesses may be placed at risk by pressure to change activities are susceptible to reverse sensitivity effects, particularly when land use changes to activities that may compete or conflict, creating reverse sensitivities.</del> "	No reason given.
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows: " <del>Many natural and physical resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users.</del> "	No reason given.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend as follows: "Maintain and <del>where possible,</del> enhance public access to the natural environment, including to the coast, lakes, rivers and their margins, and areas of cultural or historic significance, unless restricting access is necessary to: ... b) Protect the <del>natural heritage and ecosystem</del> values of sensitive natural areas or habitats; or..."	No reason given.
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: " <del>Significant h</del> Historic heritage resources are recognised and contribute to the region's character and sense of identity".	No reason given.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: " <del>Manage historic heritage values to p</del> Protect <del>and enhance</del> the values of places and areas of historic heritage <del>from inappropriate development</del> , by: ... c) Avoiding <del>remedying or mitigating</del> adverse effects on those values which contribute to the area or place being of regional or national significance; and <del>d) Avoiding significant adverse effects on other values of areas and places of historic heritage;</del>	<ul style="list-style-type: none"> <li>• The PRPS does not correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				and e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and f) Remediating, when adverse effects on other values cannot be avoided; and g) Mitigating when adverse effects on other values cannot be avoided or remediated; and h) ..."	
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows: " <del>Managing for rural</del> <u>Protecting regionally significant industry activities from inappropriate subdivision, use and development</u> Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling <u>regionally significant industry activities</u> , <del>farming and other rural activities that support the rural economy</del> ; and b) Minimising the loss of <u>regionally significant soils</u> <del>highly valued for their versatility for primary production</del> ; and c) Restricting the establishment of activities in rural areas that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u> ; and d) <del>Minimising</del> <u>Restricting</u> the subdivision of productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and e) Providing for other activities that have a functional need to locate in rural areas <del>including tourism and recreational activities that are of a nature and scale compatible with rural activities</del> ."	<ul style="list-style-type: none"> <li>• Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.</li> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> </ul>
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Amend	Amend as follows: "Recognising <u>and providing for</u> the values of Otago's central business districts Recognise <u>and provide for</u> the values of Otago's central business districts, including as the primary focal point for social, cultural and economic activities within a community."	No reason given.
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	Amend as follows: "Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of <del>the</del> <u>Otago's</u> central business districts and support local commercial needs, by: a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and ... c) Avoiding unplanned extension of commercial activities that has significant adverse effects on <del>the</del> <u>a</u> central business district, including on the efficient use of infrastructure, employment and services; and ..."	No reason given.
159	Land management for economic	Policy 4.3.5 - Managing for	Amend	Amend as follows: "Manage the finite nature of	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	production	industrial land uses		land suitable and available for industrial activities, by: a) Providing specific areas to accommodate <del>the effects of</del> industrial activities; and b) Providing a range of land suitable for different industrial activities <del>, including land extensive activities</del> ; and c) Restricting the establishment of activities in industrial areas that may result in: i. Reverse sensitivity effects <u>on industrial activities</u> ; or ii. Inefficient use of industrial land or infrastructure."	
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend as follows: "Managing locational needs for mineral and gas exploration, extraction and processing Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Giving preference to avoiding their location in-</del> <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> : i. ... b) Restricting the establishment of <del>these</del> activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities</u> ."	No reason given.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in-</del> ... <del>e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and,</del> ... g) Considering the use of offsetting, or compensatory measures, <u>to address</u> <del>for</del> residual adverse effects <u>on the environment</u> ; and ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values <del>, only</del> when: a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and b) Those <u>adverse</u> effects cannot be avoided,	<ul style="list-style-type: none"> <li>• The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection.</li> <li>• Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				remedied or mitigated; and c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."	
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Amend as follows: " <del>Providing for offsetting for from adverse effects on</del> indigenous biodiversity Provide for offsetting <del>for from adverse effects</del> on indigenous biodiversity, when <del>it is enabled, by ensuring that</del> . a) The offset achieves no net loss <del>and preferably a net gain</del> in indigenous biodiversity values; and b) The offset is undertaken close to the location of development <del>, where this will result in the best ecological outcome; and...</del> "	No reason given.
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	Add the following method: "1.1.4 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."	No reason given.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<ul style="list-style-type: none"> <li>Amend Method 1.2.1 as follows: "Identify <u>and protect from inappropriate subdivision, use and development</u>, places, areas or landscapes of cultural, spiritual or traditional significance to them;".</li> <li>Amend Method 1.2.2 as follows: "Identify, and protect <u>from inappropriate subdivision, use and development</u>, the values that contribute to their significance;".</li> <li>Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</li> </ul>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Oppose	Delete Method 1.4.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Oppose	Delete Method 2.2	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Oppose	Delete Method 2.3.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting <u>from inappropriate subdivision, use and development</u> , historic heritage places <u>or</u> <del>areas or landscapes</del> located in the beds of rivers, lakes and wetlands <u>or the coastal marine area</u> ;"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.12.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS:</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7.	<ul style="list-style-type: none"> <li>• Efficiency gains in removing unnecessary provisions.</li> <li>• Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>• Unnecessary or ambiguous ("may").</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend Method 4.2.1 as follows: "City or district councils will implement Policies 3.2.2 and 3.2.3 <u>to the extent applicable</u> , when undertaking natural hazard assessments".	No reason given.
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend Method 6.1.2 as follows: "Regional, city and district councils, in their areas of responsibility, will identify: ... -d) <u>Special amenity landscapes</u> ; ... <u>g) Regionally significant soil resources</u> ; <u>h) Significant infrastructure</u> ."	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. Too high a level of protection could have adverse effects on the economic and social wellbeing of communities.</li> <li>• Significant infrastructure should be defined, recognised and provided for.</li> </ul>
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Oppose	Delete Method 7.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
211	Method 8 - Education and Information	Method 8.1.1 - Information from regional, district and city councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
214	Method 8 - Education and Information	Method 8.1.4 - Information from city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
215	Method 9 - Funding	Method 9 - Funding	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
220	Method 11 - Advocacy and Facilitation	Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional	Oppose	Delete Methods.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Amend d) as follows: "d) Facilitate coordination between <del>lifeline utilities - significant infrastructure and significant community facilities used</del> for emergency management, including by: i) Recognising the interconnections between <del>significant infrastructure - lifeline utilities;...</del> "	No reason given.
225	Method 11 - Advocacy and Facilitation	Method 11.2.3 - Facilitation by regional, city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
248	Appendices	Appendices - general	Oppose	<ul style="list-style-type: none"> <li>• Delete Appendix 1.</li> <li>• Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS.</li> </ul>	<ul style="list-style-type: none"> <li>• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and</li> <li>• Is not required by RMA S62 or is not an active directive.</li> </ul>
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>• Add the following definitions: <ul style="list-style-type: none"> <li>• Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance;</li> <li>• Significant Community Facility - include facilities that provide essential community services; <ul style="list-style-type: none"> <li>• Urban;</li> <li>• Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS;</li> <li>• Regionally Significant Industry Activity - include any activity associated with tourism or primary production;</li> <li>• Hard mitigation measures;</li> </ul> </li> <li>• Amend definition of Kai Tahu to clarify if has the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning documents outside Otago.</li> </ul> </li> </ul>	To reduce ambiguity and enable more efficient implementation of the PRPS.
250	Glossaries	Glossary of Te Reo terms	Oppose	Delete and include these terms in the Glossary.	Unnecessary to have 2 separate glossaries.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Delete or amend text that: <ul style="list-style-type: none"> <li>• Is duplicated;</li> <li>• Is vague or ambiguous;</li> <li>• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation;</li> <li>• Is not required by RMA S62 or is not an active directive; and</li> <li>• Delete all "need" statements.</li> </ul>	<ul style="list-style-type: none"> <li>• Efficiency gains in removing unnecessary provisions.</li> <li>• Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>• "Need" statements are not required by RMA S62 or is not an active directive.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	• Any consequential or other amendments required to give effect, or like effect, to any matter raised in the submission.	No reason given.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	• Retention of all provisions as notified, except as requested in the submission.	No reason given.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Overall approach	Schedule 3 - Significance threshold	Oppose	<ul style="list-style-type: none"> <li>• Delete; or</li> <li>• Amend so it is consistent with case law and insert new criteria to reflect the need to consider offsetting or compensation and to reflect environmental/planning context on a case-by-case basis, e.g.: <ul style="list-style-type: none"> <li>* 11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly offset or otherwise compensated, and consequently reducing the significance of the effect.</li> <li>• 12. Environmental Context: The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</li> <li>• 13. Matters of national importance and national significance: The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA. The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS."</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• The S32 report does not evaluate Schedule 3.</li> <li>• Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant.</li> <li>• Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.</li> </ul>
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Amend	Amend as follows: "The principles of Te Tiriti o Waitangi are <u>identified and</u> taken into account in resource management decisions".	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	<p>Amend as follows: "Policy 1.1.2 <u>Identifying and</u> <del>Take</del> the principles of Te Tiriti o Waitangi into account</p> <p>Ensure that local authorities <del>exercise their functions and powers, to</del> <u>take into account the principles of Te Tiriti o Waitangi identified in Appendix 1A by:</u></p> <p>a) <u>Providing</u> <del>Accord</del> Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,</p> <p>b) <del>Involve</del> <u>Involving</u> Kai Tahu in resource management decision-making processes and implementation; and</p> <p>c) <del>Take</del> <u>Taking</u> into account Kai Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taoka ; and</p> <p>d) <del>Ensure</del> <u>Ensuring</u> Kai Tahu have the prerogative to:</p> <p>i. <del>Identify</del> <u>Identifying</u> their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and</p> <p>ii. <del>Determine</del> <u>Determining</u> how best to express that relationship; and</p> <p>e) <del>Ensure</del> <u>Ensuring</u> Kai Tahu are able to exercise kaitiakitaka; and</p>	Use wording of RMA Part 2.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				f) <del>Ensure</del> <u>Ensuring</u> that district and regional plans: i. <del>Give</del> <u>Giving</u> effect to the Ngai Tahu Claims Settlement Act 1998; and ii. <del>Recognise</del> <u>Recognising</u> and <del>provide</del> <u>providing</u> for statutory acknowledgement areas, as detailed in Schedule 2; and iii. <del>Provide</del> <u>Providing</u> for other areas in Otago that are recognised as significant to Kai Tahu in a manner similar to that prescribed for statutory acknowledgement areas."	
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Objective 1.2 Kai Tahu values, rights and interests and customary resources are <u>identified and</u> sustained."	No reason given.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) Ensuring <u>sustainable management of</u> resources supports <del>their</del> customary uses and cultural values (as detailed in Schedules 1A and B); and"	No reason given.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> on those values and sites <del>as detailed in Schedule 3</del> ; and"	<ul style="list-style-type: none"> <li>Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<ul style="list-style-type: none"> <li>Amend b) as follows: "b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and"</li> <li>Delete c).</li> </ul>	<ul style="list-style-type: none"> <li>Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Specify or identify "other cultural values" referred to in other parts of the RPS in Schedule 1A.	No reason given.
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	Amend Issue as follows: "Degradation of <u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time <del>will</del> <u>can</u> cause serious damage."	Regional issues include natural resource management issues.
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected <u>from inappropriate subdivision, use and development</u> ."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <del>Natural</del> <u>Environmental</u> systems <u>and resources</u> are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				affects the <u>environmental</u> value of another..."	
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural <del>and physical</del> resources are recognised, <u>and protected from inappropriate subdivision, use and development</u> , <del>maintained and enhanced</del> ."	<ul style="list-style-type: none"> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to: ... c) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... j) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and k) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and l) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ... b) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and ... g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... g) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and h) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend b) as follows: "b)Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those soils</u> , to: ... f) <del>Retain</del> Ensure the primary use of regionally significant soil resources <u>is</u> for primary production <u>purposes</u> ; and g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and ... k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>The PRPS should be focused on resource management issues of regional significance.</li> <li>Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Amend c) iii. as follows: "iii. Historical <del>and heritage</del> associations".	No reason given.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>As applies to all landscape assessments, including for "Special Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Add the following new policy: " <u>Managing cross boundary landscape effects</u> <u>Promote alignment of District Plans and integrated assessments of environmental effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries.</u> "	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries, which would benefit from a regionally integrated approach.</li> <li>This proposed policy would be as effective as the provisions on Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: " <del>Protect and enhance</del> <u>Manage subdivision, use and development that affects</u> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects <del>on those values which contribute</del> <u>which will result in</u> to the area or habitat <u>losing its being significant status</u> ; and b) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on other values of the area or habitat; and <del>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> ..."	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes <del>using the attributes as detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• These attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• Schedule 4 should be deleted</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: " <del>Protect, enhance and restore. Manage subdivision, use and development that affects</del> the values of outstanding natural features, landscapes and seascapes, by: a) <del>Avoiding adverse effects on these values which contribute to</del> <u>which will result in the loss of the</u> significance of the natural feature, landscape or seascape; and ... <del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> ... <u>g) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values</u> <u>(h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate.</u> "	<ul style="list-style-type: none"> <li>• Could disrupt the balance of the values of outstanding natural landscapes and features and other important values.</li> <li>• For example, ski fields are appropriate to locate in alpine environments that may be considered outstanding natural landscapes.</li> <li>• Ensuring such businesses can continue to operate and provide an important recreational and economic resource to Otago should be borne in mind.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding <del>using the attributes detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of different criteria being used in current or proposed district plans, and hence, creating inefficiencies and potentially slowing down forthcoming district plan reviews. These concerns also relation to Schedule 4.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social wellbeing of communities.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Amend as follows: " <del>Protect or enhance the values of. Manage</del> special amenity landscapes and highly valued natural features, by: a) <del>Avoiding, remedying or mitigating significant adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and</del> <del>b) Avoiding, remedying or mitigating other adverse effects on other values; and</del> c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> ... <u>g) Recognising and providing for the use of such resources including as places where productive activities, tourism, recreation, infrastructure, homes and work places are</u>	<ul style="list-style-type: none"> <li>• Level of protection not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it.</li> <li>• Better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category.</li> <li>• The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				located. h) <u>Allowing values to adapt over time as communities and economies change.</u> "	
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend as follows: "Preserve or enhance the natural character values of the coastal environment, by: a) Avoiding adverse effects <u>of activities on natural character in areas of the coastal environment with</u> <del>on those values which contribute to the</del> outstanding natural character of an area; and b) Avoiding significant adverse effects <u>and avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment</u> <del>on those values which contribute to the high natural character values of an area;</del> and c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and d) <u>Avoiding, remedying or mitigating other adverse effects on other values;</u> and..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend as follows: " <del>Protect</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding water bodies and wetlands by: a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> , including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and ... <del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	Amend as follows: "Policy 2.2.14 Identifying <del>highly valued</del> <u>regionally significant</u> soil resources Identify areas and values of <del>highly valued</del> <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Amend as follows: "Policy 2.2.15 Managing <del>highly valued</del> <u>regionally significant</u> soil resources Protect the values of <del>areas of highly valued</del> <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on those values which contribute to the soil being <del>highly valued</del> <u>regionally significant</u> ; and ... <del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> d) Recognising that <u>loss of regionally significant soils to urban expansion development, may be appropriate near</u> <del>due to</del>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				location and proximity to existing urban development, and infrastructure, particularly when there is a lack of supply of land available for urban development."	
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend as follows: "Natural resource systems and their interdependencies are recognised"	No reason given.
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Add the following policy: "Applying an integrated management approach for significant infrastructure and activities that affect significant infrastructure Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure, by: a) Promoting consistent corridor management throughout the region."	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>Amend a) as follows: "a) Taking into account the impacts of management of one resource on the environmental values of another, or on the environment in general; and"</li> <li>Add the following clauses: "c) Ensuring that resource objectives are complementary across administrative boundaries; and d) Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units."</li> </ul>	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete policy.	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
66	Objectives on resilience, health and safety	Issue 3.1 - Risk of overreaching the environment's carrying capacity	Amend	Amend as follows: "Activities that utilise resources are undertaken without regard to their local environmental values are at greater risk inappropriately compromising of overreaching that the environment's ability to sustain the activity."	No reason given.
70	Objectives on resilience, health and safety	Issue 3.5 - Importance of infrastructure of regional or national significance	Amend	Amend as follows: "It is important to recognise and provide for Significant Infrastructure of regional and national significance even though it may result in local adverse environmental effects impacts, or adversely affect other nationally important values..."	Significant infrastructure should be defined, recognised and provided for.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Protection, subdivision, use and development of natural and physical resources recognises environmental constraints".	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of resources, an	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				area, the <u>environmental</u> effects of those constraints on activities <u>utilising those resources</u> , and the <u>environmental</u> effects of those activities on those constraints, <del>including</del> with particular recognition of : ... c) The sensitivity of <del>the natural and physical</del> resources to adverse effects from the proposed activity/land use; and ..."	
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Amend Objective 3.2 as follows: " <del>Inappropriate</del> risk that natural hazards pose to Otago's communities are minimised"	Designing to a 100 year level may be appropriate, but it would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities <del>including hazards of low likelihood and high consequence.</del> "	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows: "Manage natural hazard risk, <del>including</del> with <u>particular</u> regard to: a) The risk <del>they</del> posed, considering the likelihood and consequences of natural hazard events; and ..."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend 1st sentence as follows: "Assess activities <u>in areas known to be subject to an identified</u> , <del>for</del> natural hazard risk, by considering:..."	No reason given.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Policy 3.2.6 Avoiding increased natural hazard risk <u>from inappropriate subdivision, use and development</u> Avoid <u>remedy or mitigate increased</u> <del>increasing</del> natural hazard risk <u>from inappropriate subdivision, use and development</u> , including by:..."	<ul style="list-style-type: none"> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• It would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).</li> </ul>
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend 1st sentence as follows: "Reduce existing natural hazard risk, <del>including particularly</del> by:"	No reason given.
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) There is significant <del>public or environmental</del> benefit in doing so; or b) The work relates to the functioning ability of <u>significant infrastructure, a lifeline utility, or facility used</u> for essential or emergency services <u>, or a significant community facility.</u> "	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ... b) Designing infrastructure to take into account: ... iv. <del>Natural and physical</del> Resource constraints; and v. Effects on the values of natural and physical	<ul style="list-style-type: none"> <li>• Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				resources; and ... c) Managing urban growth in a coordinated manner to ensure : i. Within areas that have sufficient infrastructure services are provided capacity; or ii. Where infrastructure services can be upgraded or extended efficiently and effectively ; and d) Co-ordinating the design and development of infrastructure with the staging of land use change, including with: i. Structural design and release of land for new urban development; or ii. Structural redesign and redevelopment within existing urban areas."	costs than benefits in high growth areas. • Regulation of the release of land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend as follows: "Manage infrastructure activities, to: ... b) Reduce, Avoid, remedy or mitigate adverse effects of those activities, including cumulative adverse effects on natural and physical resources; and c) Support economic, social and community needs activities; and d) Improve efficiency of use of natural resources; and e) Protect infrastructure corridors from inappropriate subdivision, uses and development for infrastructure needs, now and for the future; and ... g) Protect the functioning of significant infrastructure, lifeline utilities and essential or emergency services."	Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend as follows: "Policy 3.4.3 Designing lifeline utilities significant infrastructure and facilities for essential or emergency services Design lifeline utilities significant infrastructure , and facilities for essential or emergency services, to:..."	No reason given.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	• Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, lifeline utilities, significant infrastructure, and essential and emergency services". • Delete d).	• The practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend as follows: "Significant Infrastructure of national and regional significance is recognised and provided for managed in a sustainable way."	Significant infrastructure should be defined, recognised and provided for.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend as follows: "Policy 3.5.1 Recognising and providing for national and regional significance of infrastructure	• Significant infrastructure should be defined, recognised and provided for. • The PRPS does not give enough recognition of and provision for the tourism sector.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Recognise <del>and provide for</del> the <del>national and regional</del> significance of the following infrastructure: a) Renewable electricity generation facilities <del>where they supply the national electricity grid and local distribution network</del> ; and ... f) Structures for transportation by rail <del>and tourism activities</del> ."	
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend as follows: "Policy 3.5.2 Managing adverse effects of <del>significant</del> infrastructure <del>that has national or regional significance</del> <del>Minimise</del> <del>Avoid, remedy or mitigate</del> adverse effects from <del>significant</del> infrastructure <del>that has national or regional significance</del> , by: a) <del>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</del> <del>Giving preference to avoiding their location in:</del> ... b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding minimising</del> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and ... <del>d) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> e) <del>Considering</del> <del>Enabling infrastructure providers to employ</del> the use of offsetting <del>or</del> other compensatory measures <del>to address</del> <del>for</del> residual adverse effects on <del>the environment</del> indigenous biodiversity."	<ul style="list-style-type: none"> <li>• Significant infrastructure should be defined, recognised and provided for.</li> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<ul style="list-style-type: none"> <li>• Amend header as follows: "Protecting <del>significant</del> infrastructure <del>of national or regional significance</del>".</li> <li>• Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>• Significant infrastructure should be defined, recognised and provided for.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	Amend as follows: "Policy 3.6.2 Promoting small <del>and community</del> scale renewable electricity generation Promote small <del>and community</del> scale renewable electricity generation activities that : a) <del>Increase the local community's resilience and security of energy supply; and</del> b) <del>Avoid, remedy or mitigate adverse effects from that activity</del> ."	No reason given.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	<ul style="list-style-type: none"> <li>• Amend 1st sentence as follows: "Protect the generation capacity of <del>nationally or regionally significant</del> renewable electricity generation activities, by...".</li> <li>• Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
113	Energy	Policy 3.6.5 - Protecting	Amend	Amend as follows:	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		electricity distribution infrastructure		<ul style="list-style-type: none"> <li>• Delete d).</li> <li>• "e) Protecting <del>existing</del> distribution corridors for infrastructure needs, now and for the future."</li> </ul>	<ul style="list-style-type: none"> <li>• questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	<p>Amend as follows: "Encourage the use of good urban design principles in subdivision and development in urban areas <del>, as detailed in Schedule 6,</del> to:</p> <p>...</p> <p>b) Ensure that the built form relates well to its <u>surrounding</u> <del>natural</del> environment <del>, including by:</del></p> <p>i. <del>Reflecting natural features such as rivers, lakes, wetlands and topography; and</del></p> <p>ii. <del>Providing for ecological corridors in urban areas; and</del></p> <p>iii. <del>Protecting areas of indigenous biodiversity and habitat for indigenous fauna; and</del></p> <p>iv. <del>Encouraging use of low impact design techniques; and</del></p> <p>v. <del>Encouraging construction of warmer buildings</del> ; and</p> <p>..."</p>	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend a) as follows: "a) <del>Maximising</del> <u>Optimising</u> passive solar gain; and"	No reason given.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend as follows: "Design <u>and maintain</u> public spaces, including streets and open spaces, to <u>provide for a range of uses and</u> meeting the reasonable access and mobility needs of all sectors within the community <del>, including the young and those with mobility impairments."</del>	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	<p>Amend as follows:</p> <p>"Policy 3.8.1 <del>Managing</del> <u>Providing</u> for urban growth</p> <p><del>Manage</del> <u>Provide for</u> urban growth and creation of new urban land in a strategic and co-ordinated way, by:</p> <p>a) <u>Understanding demand and supply of</u> <del>Ensuring there is sufficient</del> residential, commercial and industrial <u>zoned</u> land capacity, to <u>and catering for that</u> demand <del>for such land, projected over at least the next 10 years</del>; and</p> <p>b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to:</p> <p>i. Provide infrastructure in an efficient and effective way; and</p> <p>ii. <del>Avoid</del> <u>Discouraging</u> additional costs <u>on the public</u> that arise from unplanned infrastructure expansion; and</p> <p>c) Identifying future growth areas that:</p>	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community.</li> <li>• Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>i. Minimise <del>significant</del> adverse effects on <del>rural the productivity of the rural and tourism sectors</del>, <del>including loss of highly valued soils or creating competing urban demand for water and other resources</del>; and</p> <p>ii. <del>Can be developed without resulting in significant adverse effects on any matter of national importance or national significance. Maintain or enhance significant biodiversity, landscape or natural character values; and</del></p> <p><del>iii. Maintain important cultural or heritage values; and</del></p> <p><del>iv. iii. Avoid land with significant risk from natural hazards which cannot be remedied or mitigated; and</del></p> <p>d) Considering the need for urban growth boundaries to control <del>potentially inappropriate</del> urban expansion; and</p> <p>e) Ensuring efficient use of land; and</p> <p>f) Requiring the use of low or no-emission heating systems in buildings, <del>when</del> <u>where</u> ambient air quality <del>in or near the growth area</del> is:</p> <p>i. Below standards for human health; or</p> <p>ii. Vulnerable to degradation given the local climatic and geographical context; and</p> <p>g) Giving effect to the principles of good urban design <del>as detailed in Schedule 6</del>; and</p> <p>h) Giving effect to the principles of crime prevention through environmental design</p>	<ul style="list-style-type: none"> <li>• “Considering the need for urban growth boundaries” should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential methods.</li> <li>• “Avoidance” of natural hazards needs to be widened to “avoid, remedy or mitigate”, which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	Delete the policy.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to</li> </ul>

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					<p>become embroiled in urban growth management at a local level.</p> <ul style="list-style-type: none"> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<p>Amend as follows: "Manage subdivision, use and development of rural land, to:</p> <p>a) Avoid <u>inappropriate</u> development or fragmentation of land, <u>particularly</u> which undermines or forecloses the potential of rural land:</p> <p>i. For primary production <u>or tourism</u>; or</p> <p>...</p> <p>b) Have particular regard to whether the proposal will result in a loss of the productive potential of <u>regionally significant</u> <del>highly versatile</del> soils, unless:</p> <p>i. The land adjoins an existing urban area and there is no other land suitable for urban expansion <u>or there is a shortage of land available</u> for urban development; and</p> <p>ii. <del>There highly versatile soils are needed for urban expansion,</del> any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and</p> <p>iii. reverse sensitivity effects on rural productive activities can be <u>satisfactorily</u> avoided; and</p> <p>c) Avoid unplanned demand for provision of <u>public</u> infrastructure <u>investment</u>, including domestic water supply and waste disposal; and</p> <p>d) Avoid creating <u>significant</u> competing demand for water <del>or other</del> resources."</p>	<ul style="list-style-type: none"> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	<p>Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk</u> <del>harm</del> human health or the quality of the environment <del>in Otago</del>".</p>	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	<p>Amend c) as follows: "c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and".</p>	No reason given.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	<p>Amend a) as follows: "a) Prior to subdivision or development of potentially contaminated land, <del>requiring</del> <u>ensuring</u> a site investigation is undertaken to determine the nature or extent of any contamination; and"</p>	No reason given.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	<p>Amend as follows: "Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably</u></p>	<ul style="list-style-type: none"> <li>• Avoiding the creation of new contaminated land may not always be appropriate or practical: in remediating contaminated land it may be appropriate to move soil to another location depending on where it is</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<u>degrade natural values</u> ."	situated and how that land is to be used. • The emphasis should be on avoiding risks to human health or the environment.
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	<ul style="list-style-type: none"> <li>• Add the following objective: "Significant industry activities and physical resources are provided for".</li> <li>• Add the following policy: "Recognising and providing for significant industry activities and physical resources Recognising and providing for significant industry activities and physical resources, by: a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety; b) Protecting significant industry activities from inappropriate subdivision, use, and development; c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated."</li> <li>• Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to: a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and cultural well-being; b) Protect significant industry activities from inappropriate subdivision, use, and development; c) Enable significant industry activities and development that does not have a significant adverse effect on the environment; d) Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance."</li> </ul>	Regionally Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Amend	Amend as follows: " <del>Sometimes, existing businesses may be placed at risk by pressure to change activities are susceptible to reverse sensitivity effects, particularly when land use changes to activities that may compete or conflict, creating reverse sensitivities.</del> "	No reason given.
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows: " <del>Many natural and physical resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users.</del> "	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend as follows: " <del>Maintain and, where possible,</del> enhance public access to the natural environment, including to the coast, lakes, rivers and their margins, and areas of cultural or historic significance, unless restricting access is necessary to: ... b) Protect the <del>natural heritage and ecosystem</del> values of sensitive natural areas or habitats; or..."	No reason given.
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: " <del>Significant h</del> Historic heritage resources are recognised and contribute to the region's character and sense of identity".	No reason given.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: " <del>Manage historic heritage values to p</del> <u>Protect and enhance</u> the values of places and areas of historic heritage <del>from inappropriate development</del> , by: ... c) Avoiding <del>, remedying or mitigating</del> adverse effects on those values which contribute to the area or place being of regional or national significance; and <del>d) Avoiding significant adverse effects on other values of areas and places of historic heritage; and</del> e) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> f) <del>Remediating, when adverse effects on other values cannot be avoided; and</del> g) <del>Mitigating when adverse effects on other values cannot be avoided or remediated; and</del> h) <del>...</del> "	<ul style="list-style-type: none"> <li>• The PRPS does not correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows: <del>"Managing for rural</del> <u>Protecting regionally significant industry activities from inappropriate subdivision, use and development</u> Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling <u>regionally significant industry activities</u> <del>, farming and other rural activities that support the rural economy;</del> and b) Minimising the loss of <u>regionally significant soils</u> <del>highly valued for their versatility for primary production;</del> and c) Restricting the establishment of activities in <del>rural areas</del> that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u> ; and d) <del>Minimising</del> <u>Restricting</u> the subdivision of productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and e) Providing for other activities that have a functional need to locate in rural areas <del>including tourism and recreational activities that</del>	<ul style="list-style-type: none"> <li>• Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.</li> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				are of a nature and scale compatible with rural activities."	
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Amend	Amend as follows: "Recognising <u>and providing for</u> the values of Otago's central business districts Recognise <u>and provide for</u> the values of Otago's central business districts, including as the primary focal point for social, cultural and economic activities within a community."	No reason given.
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	Amend as follows: "Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of <del>the</del> <u>Otago's</u> central business districts and support local commercial needs, by: a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and ... c) Avoiding unplanned extension of commercial activities that has significant adverse effects on <del>the</del> <u>a</u> central business district, including on the efficient use of infrastructure, employment and services; and ..."	No reason given.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	Amend as follows: "Manage the finite nature of land suitable and available for industrial activities, by: a) Providing specific areas to accommodate <del>the effects of</del> industrial activities; and b) Providing a range of land suitable for different industrial activities, <del>including land extensive activities</del> ; and c) Restricting the establishment of activities in industrial areas that may result in: i. Reverse sensitivity effects <u>on industrial activities</u> ; or ii. Inefficient use of industrial land or infrastructure."	No reason given.
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend as follows: "Managing locational needs for mineral and gas exploration, extraction and processing Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Giving preference to avoiding their location in</del> <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> : i. ... b) Restricting the establishment of <del>these</del> activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities</u> ."	No reason given.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> -Giving preference to avoiding their location in-: ... -e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3- and; ... g) Considering the use of offsetting, or compensatory measures, <u>to address</u> -for residual adverse effects <u>on the environment</u> ; and ..."	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values <del>only</del> when: a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and b) Those <u>adverse</u> effects cannot be avoided, remedied or mitigated; and c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."	<ul style="list-style-type: none"> <li>The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection.</li> <li>Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Amend as follows: " <del>Providing for o</del> Offsetting <del>for</del> <u>from adverse effects on</u> indigenous biodiversity Provide for offsetting <del>for</del> <u>from adverse effects</u> on indigenous biodiversity, when <del>it is enabled, by ensuring that:</del> a) The offset achieves no net loss <del>and preferably a net gain</del> in indigenous biodiversity values; and b) The offset is undertaken close to the location of development <del>, where this will result in the best ecological outcome</del> ; and..."	No reason given.
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	Add the following method: "1.1.4 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."	No reason given.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<ul style="list-style-type: none"> <li>Amend Method 1.2.1 as follows: "Identify <u>and protect from inappropriate subdivision, use and development</u>, places, areas or landscapes of cultural, spiritual or traditional significance to them;".</li> <li>Amend Method 1.2.2 as follows: "Identify, and protect <u>from inappropriate subdivision, use and development</u>, the values that contribute to their significance;".</li> <li>Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent</li> </ul>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				applications and private plan change requests."	
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Oppose	Delete Method 1.4.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Oppose	Delete Method 2.2	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Oppose	Delete Method 2.3.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting <u>from inappropriate subdivision, use and development</u> , historic heritage places <u>or</u> areas <del>or landscapes</del> located in the beds of rivers, lakes and wetlands or the coastal marine area;"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.12.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7.	<ul style="list-style-type: none"> <li>• Efficiency gains in removing unnecessary provisions.</li> <li>• Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>• Unnecessary or ambiguous ("may").</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend Method 4.2.1 as follows: "City or district councils will implement Policies 3.2.2 and 3.2.3 <u>to the extent applicable</u> when undertaking natural hazard assessments".	No reason given.
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
198	Method 6 - Research, Monitoring	Method 6.1 - Identification of	Amend	Amend Method 6.1.2 as follows: "Regional, city	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	and Reporting	important resources		and district councils, in their areas of responsibility, will identify: ... -d) <del>Special amenity landscapes;</del> ... <u>g) Regionally significant soil resources;</u> <u>h) Significant infrastructure;</u> "	Landscapes. • Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews. • Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. Too high a level of protection could have adverse effects on the economic and social wellbeing of communities. • Significant infrastructure should be defined, recognised and provided for.
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Oppose	Delete Method 7.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
211	Method 8 - Education and Information	Method 8.1.1 - Information from regional, district and city councils - optional	Oppose	Delete Method.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
214	Method 8 - Education and Information	Method 8.1.4 - Information from city and district councils - optional	Oppose	Delete Method.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
215	Method 9 - Funding	Method 9 - Funding	Oppose	Delete Method.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
220	Method 11 - Advocacy and Facilitation	Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional	Oppose	Delete Methods.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Amend d) as follows: "d) Facilitate coordination between <del>lifeline utilities - significant infrastructure and significant community facilities used</del> for emergency management, including by: i) Recognising the interconnections between <del>significant infrastructure - lifeline utilities -...</del> "	No reason given.
225	Method 11 - Advocacy and Facilitation	Method 11.2.3 - Facilitation by regional, city and district councils - optional	Oppose	Delete Method.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
248	Appendices	Appendices - general	Oppose	• Delete Appendix 1. • Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS.	• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and • Is not required by RMA S62 or is not an active directive.
249	Glossaries	Glossary	Amend	• Add the following definitions: • Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance; • Significant Community Facility - include facilities that provide essential community services; • Urban; • Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS; • Regionally Significant Industry Activity - include any activity associated with tourism or primary production; • Hard mitigation measures; • Amend definition of Kai Tahu to clarify if has	To reduce ambiguity and enable more efficient implementation of the PRPS.

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				the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning documents outside Otago.	
250	Glossaries	Glossary of Te Reo terms	Oppose	Delete and include these terms in the Glossary.	Unnecessary to have 2 separate glossaries.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Delete or amend text that: <ul style="list-style-type: none"> <li>• Is duplicated;</li> <li>• Is vague or ambiguous;</li> <li>• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation;</li> <li>• Is not required by RMA S62 or is not an active directive; and</li> <li>• Delete all "need" statements.</li> </ul>	<ul style="list-style-type: none"> <li>• Efficiency gains in removing unnecessary provisions.</li> <li>• Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>• "Need" statements are not required by RMA S62 or is not an active directive.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	• Any consequential or other amendments required to give effect, or like effect, to any matter raised in the submission.	No reason given.

### 105 Eastburn Farm

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	• Retention of all provisions as notified, except as requested in the submission.	No reason given.
6	Overall approach	Schedule 3 - Significance threshold	Oppose	<ul style="list-style-type: none"> <li>• Delete; or</li> <li>• Amend so it is consistent with case law and insert new criteria to reflect the need to consider offsetting or compensation and to reflect environmental/planning context on a case-by-case basis, e.g.: <ul style="list-style-type: none"> <li>" 11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly offset or otherwise compensated, and consequently reducing the significance of the effect.</li> <li>• 12. Environmental Context: The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</li> <li>• 13. Matters of national importance and national significance: The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA. The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS."</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• The S32 report does not evaluate Schedule 3.</li> <li>• Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant.</li> <li>• Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.</li> </ul>
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Amend	Amend as follows: "The principles of Te Tiriti o Waitangi are <u>identified and</u> taken into account in resource management decisions".	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	Amend as follows: "Policy 1.1.2 <u>Identifying and</u> taking the principles of Te Tiriti o Waitangi into account Ensure that local authorities <del>exercise their</del>	Use wording of RMA Part 2.

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				<p>functions and powers, to <u>take into account the principles of Te Tiriti o Waitangi identified in Appendix 1A</u> by:</p> <p>a) <del>Providing</del> <del>Accord</del> Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,</p> <p>b) <del>Involve</del> <u>Involving</u> Kai Tahu in resource management decision-making processes and implementation; and</p> <p>c) <del>Take</del> <u>Taking</u> into account Kai Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taoka ; and</p> <p>d) <del>Ensure</del> <u>Ensuring</u> Kai Tahu have the prerogative to:</p> <p>i. <del>Identify</del> <u>Identifying</u> their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and</p> <p>ii. <del>Determine</del> <u>Determining</u> how best to express that relationship; and</p> <p>e) <del>Ensure</del> <u>Ensuring</u> Kai Tahu are able to exercise kaitiakitaka; and</p> <p>f) <del>Ensure</del> <u>Ensuring</u> that district and regional plans:</p> <p>i. <del>Give</del> <u>Giving</u> effect to the Ngai Tahu Claims Settlement Act 1998; and</p> <p>ii. <del>Recognise</del> <u>Recognising</u> and <del>provide</del> <u>providing</u> for statutory acknowledgement areas, as detailed in Schedule 2; and</p> <p>iii. <del>Provide</del> <u>Providing</u> for other areas in Otago that are recognised as significant to Kai Tahu in a manner similar to that prescribed for statutory acknowledgement areas."</p>	
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Objective 1.2 Kai Tahu values, rights and interests and customary resources are <u>identified and</u> sustained."	No reason given.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) Ensuring <u>sustainable management of</u> resources supports <del>their</del> customary uses and cultural values (as detailed in Schedules 1A and B); and"	No reason given.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> on those values and sites <del>as detailed in Schedule 3</del> ; and"	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<ul style="list-style-type: none"> <li>• Amend b) as follows: "b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and"</li> <li>• Delete c).</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Specify or identify "other cultural values" referred to in other parts of the RPS in Schedule 1A.	No reason given.
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	Amend Issue as follows: "Degradation of <u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time <del>will</del> <u>can</u> cause serious damage."	Regional issues include natural resource management issues.
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected <u>from inappropriate subdivision, use and development</u> ."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <del>Natural</del> <u>Environmental</u> systems <u>and resources</u> are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely affects the <u>environmental</u> value of another..."	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural <del>and physical</del> resources are recognised, <u>and protected from inappropriate subdivision, use and development</u> , <del>maintained and enhanced</del> ."	<ul style="list-style-type: none"> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to: ... c) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... j) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and k) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and l) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ... b) Protect outstanding water bodies and	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				wetlands <u>from inappropriate subdivision, use and development</u> ; and ... g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and..."	
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... g) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and h) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend b) as follows: "b)Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those</u> soils, to: ... f) <del>Retain</del> <u>Ensure the primary use of regionally significant soil resources is</u> for primary production <u>purposes</u> ; and g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and ... k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Amend c) iii. as follows: "iii. Historical <del>and heritage</del> - associations".	No reason given.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• As applies to all landscape assessments, including for "Special</li> </ul>

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					Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Add the following new policy: " <u>Managing cross boundary landscape effects</u> <u>Promote alignment of District Plans and</u> <u>integrated assessments of environmental</u> <u>effects when assessing landscape values and</u> <u>effects in landscapes which traverse territorial</u> <u>authority boundaries.</u> "	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries, which would benefit from a regionally integrated approach.</li> <li>This proposed policy would be as effective as the provisions on Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: " <del>Protect and enhance</del> <u>Manage subdivision, use and development that</u> <u>affects</u> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) <del>Avoiding adverse effects</del> <del>on these values</del> <del>which contribute</del> <del>which will result in</del> to the area or habitat <del>losing its</del> <del>being</del> significant <u>status</u> ; and b) <del>Avoiding significant adverse effects</del> <del>from</del> <del>inappropriate subdivision, use and development</del> on other values of the area or habitat; and <del>c) Assessing the significance of adverse effects</del> <del>on these values, as detailed in Schedule 3; and</del> <del>...</del> "	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes <del>, using the attributes as detailed in</del> <del>Schedule 4.</del> "	<ul style="list-style-type: none"> <li>These attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>Schedule 4 should be deleted</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: " <del>Protect, enhance and</del> <del>restore</del> <u>Manage subdivision, use and</u> <u>development that affects</u> the values of outstanding natural features, landscapes and seascapes, by: a) <del>Avoiding adverse effects</del> <del>on these values</del> <del>which contribute to</del> <del>which will result in</del> the <del>loss of the</del> significance of the natural feature, landscape or seascape; and ... <del>c) Assessing the significance of adverse effects</del> <del>on values, as detailed in Schedule 3; and</del> <del>...</del> ... <u>g) Recognising that appropriately designed and</u> <u>managed recreational activities in such</u> <u>locations can be appropriate, and can entail</u> <u>community benefits such as the enjoyment of</u> <u>landscapes values</u> <u>(h) Recognising that when activities have a</u> <u>functional need to locate within such places and</u> <u>emphasis on mitigating or remedying adverse</u> <u>effects rather than avoiding them may be</u> <u>appropriate.</u> "	<ul style="list-style-type: none"> <li>Could disrupt the balance of the values of outstanding natural landscapes and features and other important values.</li> <li>For example, ski fields are appropriate to locate in alpine environments that may be considered outstanding natural landscapes.</li> <li>Ensuring such businesses can continue to operate and provide an important recreational and economic resource to Otago should be borne in mind.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but	<ul style="list-style-type: none"> <li>Concerned about introducing the term of Special Amenity Landscapes.</li> <li>Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of</li> </ul>



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				which are not outstanding ,using the attributes detailed in Schedule 4. "	different criteria being used in current or proposed district plans, and hence, creating inefficiencies and potentially slowing down forthcoming district plan reviews. These concerns also relation to Schedule 4. <ul style="list-style-type: none"> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social wellbeing of communities.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Amend as follows: " <del>Protect or enhance the values of</del> <u>Manage</u> special amenity landscapes and highly valued natural features, by: a) <del>Avoiding ,remedying or mitigating significant</del> adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and <del>b) Avoiding, remedying or mitigating other adverse effects on other values; and</del> c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> ... <u>g) Recognising and providing for the use of such resources including as places where productive activities , tourism, recreation, infrastructure, homes and work places are located.</u> <u>h) Allowing values to adapt over time as communities and economies change."</u>	<ul style="list-style-type: none"> <li>• Level of protection not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it.</li> <li>• Better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category.</li> <li>• The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend as follows: "Preserve or enhance the natural character values of the coastal environment, by: a) <del>Avoiding adverse effects of activities on natural character in areas of the coastal environment with</del> <u>on those values which contribute to the</u> outstanding natural character of an area; and b) <del>Avoiding significant adverse effects and avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment</del> <u>on those values which contribute to the high natural character values of an area; and</u> c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> d) <del>Avoiding, remedying or mitigating other adverse effects on other values; and...</del> "	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend as follows: " <del>Protect</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding water bodies and wetlands by: a) <del>Avoiding significant adverse effects from inappropriate subdivision, use and development</del> <u>, including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and</u> ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

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				-c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and ..."	
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	Amend as follows: "Policy 2.2.14 Identifying <u>highly valued regionally significant</u> soil resources Identify areas and values of <u>highly valued regionally significant</u> soil resources, using the following criteria: ..."	No reason given.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Amend as follows: "Policy 2.2.15 Managing <u>highly valued regionally significant</u> soil resources Protect the values of <u>areas of highly valued regionally significant</u> soil resources, by: a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on those values which contribute to the soil being <u>highly valued - regionally significant</u> ; and ... -c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and d) Recognising that <u>loss of regionally significant soils to urban expansion development</u> may be appropriate <u>near -due to location and proximity to existing urban development, and infrastructure, particularly when there is a lack of supply of land available for urban development.</u> "	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend as follows: " <del>Natural resource s</del> Systems and their interdependencies are recognised"	No reason given.
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Add the following policy: " <u>Applying an integrated management approach for significant infrastructure and activities that affect significant infrastructure</u> <u>Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure, by:</u> a) <u>Promoting consistent corridor management throughout the region.</u> "	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>• Amend a) as follows: "a) Taking into account the impacts of management of one resource on the <u>environmental</u> values of another, or on the environment in general; and".</li> <li>• Add the following clauses: "<u>c) Ensuring that resource objectives are complementary across administrative boundaries; and</u> <u>d) Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
61	Natural systems and	Policy 2.3.2 - Applying an	Oppose	Delete policy.	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial</li> </ul>

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	interdependencies	integrated management approach within a resource			boundaries and would therefore benefit from a regionally integrated approach. • Amendments sought to improve the management of cross boundary issues and resources.
66	Objectives on resilience, health and safety	Issue 3.1 - Risk of overreaching the environment's carrying capacity	Amend	Amend as follows: " <del>Activities that utilise resources -are undertaken-</del> without regard to <del>their local- environmental values -are at greater risk inappropriately compromising -of overreaching that- the</del> environment's ability to sustain the activity."	No reason given.
70	Objectives on resilience, health and safety	Issue 3.5 - Importance of infrastructure of regional or national significance	Amend	Amend as follows: " <del>It is important to recognise and provide for Significant Infrastructure -of regional and national significance- even though it may result in -local- adverse environmental effects -impacts-, or adversely affect other nationally important values-...</del> "	Significant infrastructure should be defined, recognised and provided for.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Protection, <del>subdivision,</del> use and development of <del>natural and physical</del> resources recognises environmental constraints".	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising <del>natural and physical</del> environmental constraints Recognise the <del>natural and physical</del> environmental constraints of <del>resources -an area-, the environmental</del> effects of those constraints on activities <del>utilising those resources</del> , and the <del>environmental</del> effects of those activities on those constraints, <del>including with particular recognition of :</del> ... c) The sensitivity of <del>the natural and physical</del> resources to adverse effects from the proposed activity/land use; and ..."	No reason given.
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Amend Objective 3.2 as follows: " <del>Inappropriate</del> risk that natural hazards pose to Otago's communities are minimised"	Designing to a 100 year level may be appropriate, but it would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities <del>including hazards of low likelihood and high consequence-</del> "	• Unnecessary ("including"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows: "Manage natural hazard risk, <del>including-</del> with <u>particular</u> regard to: a) The risk <del>they</del> posed, considering the likelihood and consequences of natural hazard events; and ..."	• Unnecessary ("including"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend 1st sentence as follows: "Assess activities <u>in areas known to be subject to an identified</u> , <del>for-</del> natural hazard risk, by considering:..."	No reason given.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Policy 3.2.6 Avoiding increased natural hazard risk <del>from inappropriate subdivision, use and</del>	• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				development Avoid <del>remedy or mitigate increased</del> increasing natural hazard risk from <del>inappropriate subdivision, use and development</del> , including by:..."	District. • It would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend 1st sentence as follows: "Reduce existing natural hazard risk, <del>including particularly by:</del> ":	No reason given.
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) There is significant <del>public or environmental</del> benefit in doing so; or b) The work relates to the functioning ability of <u>significant infrastructure</u> , a <del>lifeline utility, or facility used</del> for essential or emergency services <del>, or a significant community facility</del> ."	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ... b) Designing infrastructure to take into account: ... iv. <del>Natural and physical</del> Resource constraints; and v. Effects on the values of natural and physical resources; and ... c) Managing urban growth <u>in a coordinated manner to ensure</u> : i. <del>Within areas that have</del> sufficient infrastructure <del>services are provided</del> <del>capacity</del> ; or ii. <del>Where infrastructure services can be upgraded or extended</del> efficiently and effectively ; and d) <del>Co-ordinating the design and development of infrastructure with the staging of land use change, including with:</del> i. <del>Structural design and release of land for new urban development;</del> or ii. <del>Structural redesign and redevelopment within existing urban areas</del> ."	<ul style="list-style-type: none"> <li>• Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community costs than benefits in high growth areas.</li> <li>• Regulation of the release of land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend as follows: "Manage infrastructure activities, to: ... b) <del>Reduce</del> <u>Avoid, remedy or mitigate</u> adverse effects of those activities, including cumulative adverse effects on <del>natural and physical</del> resources; and c) Support economic, social and community <u>needs</u> <del>activities</del> ; and d) Improve efficiency of use of <del>natural</del> resources; and e) Protect infrastructure corridors <u>from</u> <del>inappropriate subdivision, uses and development</del> <del>for infrastructure needs, now and</del>	Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				for the future; and ... g) Protect the functioning of <u>significant infrastructure</u> , <del>lifeline utilities</del> and essential or emergency services."	
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend as follows: "Policy 3.4.3 Designing <del>lifeline utilities</del> <u>significant infrastructure</u> and facilities for essential or emergency services Design <del>lifeline utilities</del> <u>significant infrastructure</u> , and facilities for essential or emergency services, to:..."	No reason given.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	• Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, <del>lifeline utilities</del> , <u>significant infrastructure</u> , and essential and emergency services". • Delete d).	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend as follows: " <u>Significant</u> Infrastructure of national and regional significance is <u>recognised and provided for</u> managed in a sustainable way."	Significant infrastructure should be defined, recognised and provided for.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend as follows: "Policy 3.5.1 Recognising <u>and providing for</u> national and regional significance of infrastructure Recognise <u>and provide for</u> the national and regional significance of the following infrastructure: a) Renewable electricity generation facilities <del>where they supply the national electricity grid and local distribution network</del> ; and ... f) Structures for transportation by rail <u>and tourism activities</u> ."	<ul style="list-style-type: none"> <li>• Significant infrastructure should be defined, recognised and provided for.</li> <li>• The PRPS does not give enough recognition of and provision for the tourism sector.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend as follows: "Policy 3.5.2 Managing adverse effects of <u>significant</u> infrastructure <del>that has national or regional significance</del> <del>Minimise</del> <u>Avoid, remedy or mitigate</u> adverse effects from <u>significant</u> infrastructure <del>that has national or regional significance</del> , by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in:</del> ... b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding</del> <u>minimising</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and ... d) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del>	<ul style="list-style-type: none"> <li>• Significant infrastructure should be defined, recognised and provided for.</li> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

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				e) <del>Considering</del> <u>Enabling infrastructure providers to employ</u> the use of offsetting <del>or</del> other compensatory measures <u>to address</u> <del>for</del> residual adverse effects on <u>the environment</u> <del>indigenous biodiversity</del> .	
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Protecting <u>significant</u> infrastructure <del>of national or regional significance</del>".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	Amend as follows: "Policy 3.6.2 Promoting small <u>and community</u> scale renewable electricity generation Promote small <u>and community</u> scale renewable electricity generation activities that : a) <del>Increase the local community's resilience and security of energy supply;</del> and b) <del>Avoid, remedy or mitigate adverse effects from that activity.</del> "	No reason given.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	<ul style="list-style-type: none"> <li>Amend 1st sentence as follows: "Protect the generation capacity of <u>nationally or regionally significant</u> renewable electricity generation activities, by..."</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	Amend as follows: <ul style="list-style-type: none"> <li>Delete d).</li> <li>"e) Protecting <del>existing</del> distribution corridors for infrastructure needs, now and for the future."</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	Amend as follows: "Encourage the use of good urban design principles in subdivision and development in urban areas <del>as detailed in Schedule 6</del> , to: ... b) Ensure that the built form relates well to its <u>surrounding</u> <del>natural</del> environment <del>including</del> by: i. <del>Reflecting natural features such as rivers, lakes, wetlands and topography;</del> and ii. <del>Providing for ecological corridors in urban areas;</del> and iii. <del>Protecting areas of indigenous biodiversity and habitat for indigenous fauna;</del> and iv. <del>Encouraging use of low impact design techniques;</del> and v. <del>Encouraging construction of warmer buildings</del> ; and ..."	<ul style="list-style-type: none"> <li>Schedule 6 not assessed in S32 report.</li> <li>Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>May be to the detriment of good urban design for specific sites.</li> </ul>
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>Schedule 6 not assessed in S32 report.</li> <li>Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>May be to the detriment of good urban design for specific sites.</li> </ul>
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend a) as follows: "a) <del>Maximising</del> <u>Optimising</u> passive solar gain; and"	No reason given.
121	Urban design	Policy 3.7.4 - Designing for good	Amend	Amend as follows: " <u>Design and maintain</u> public	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("including").</li> </ul>

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		access in public spaces		spaces, including streets and open spaces, to <u>provide for a range of uses and</u> meeting the reasonable access and mobility needs of all sectors within the community, <del>including the young and those with mobility impairments.</del> "	<ul style="list-style-type: none"> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	<p>Amend as follows:</p> <p>"Policy 3.8.1 <del>Managing</del> <u>Providing</u> for urban growth</p> <p><del>Manage</del> <u>Provide for</u> urban growth and creation of new urban land in a strategic and co-ordinated way, by:</p> <p>a) <u>Understanding demand and supply of</u> <del>Ensuring there is sufficient</del> residential, commercial and industrial <u>zoned land capacity, to and catering for that demand for</u> such land, <del>projected over at least the next 10 years</del>; and</p> <p>b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to:</p> <p>i. Provide infrastructure in an efficient and effective way; and</p> <p>ii. <del>Avoid</del> <u>Discouraging</u> additional costs <u>on the public</u> that arise from unplanned infrastructure expansion; and</p> <p>c) Identifying future growth areas that:</p> <p>i. Minimise <u>significant</u> adverse effects on <del>rural the</del> <u>productivity of the rural and tourism sectors</u>, <del>including loss of highly valued soils or creating competing urban demand for water and other resources</del>; and</p> <p>ii. <u>Can be developed without resulting in significant adverse effects on any matter of national importance or national significance</u> <del>Maintain or enhance significant biodiversity, landscape or natural character values</del>; and</p> <p>iii. <u>Maintain important cultural or heritage values</u>; and</p> <p><del>iv. iii.</del> <u>Avoid land with significant risk from natural hazards which cannot be remedied or mitigated</u>; and</p> <p>d) Considering the need for urban growth boundaries to control <u>potentially inappropriate</u> urban expansion; and</p> <p>e) Ensuring efficient use of land; and</p> <p>f) Requiring the use of low or no-emission heating systems in buildings, <del>when</del> <u>where</u> ambient air quality <del>in or near the growth area</del> is:</p> <p>i. Below standards for human health; or</p> <p>ii. Vulnerable to degradation given the local climatic and geographical context; and</p> <p>g) Giving effect to the principles of good urban design <del>as detailed in Schedule 6</del>; and</p> <p>h) Giving effect to the principles of crime prevention through environmental design</p>	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas.</li> <li>The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community.</li> <li>Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS.</li> <li>"Considering the need for urban growth boundaries" should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential methods.</li> <li>"Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>Schedule 6 not assessed in S32 report.</li> <li>Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>May be to the detriment of good urban design for specific sites.</li> </ul>

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125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	Delete the policy.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend as follows: "Manage subdivision, use and development of rural land, to: a) Avoid <u>inappropriate</u> development or fragmentation of land <u>, particularly</u> which undermines or forecloses the potential of rural land: i. For primary production <u>or tourism</u> ; or ... b) Have particular regard to whether the proposal will result in a loss of the productive potential of <u>regionally significant</u> <del>highly versatile</del> soils, unless: i. The land adjoins an existing urban area and there is no other land suitable for urban expansion <u>, or there is a shortage of land available for urban development</u> ; and ii. <del>There highly versatile soils are needed for urban expansion,</del> any change of land use from rural activities achieves an appropriate and	<ul style="list-style-type: none"> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>



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				highly efficient form of urban development; and iii. reverse sensitivity effects on rural productive activities can be <u>satisfactorily</u> avoided; and c) Avoid unplanned demand for provision of <u>public infrastructure investment</u> , including domestic water supply and waste disposal; and d) Avoid creating <u>significant</u> competing demand for water <del>or other</del> resources."	
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk</u> <del>harm</del> human health or the quality of the environment <del>in Otago</del> ".	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend c) as follows: "c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and".	No reason given.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Amend a) as follows: "a) Prior to subdivision or development of potentially contaminated land, <del>requiring</del> <u>ensuring</u> a site investigation is undertaken to determine the nature or extent of any contamination; and"	No reason given.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Amend as follows: "Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably degrade natural values</u> ".	<ul style="list-style-type: none"> <li>• Avoiding the creation of new contaminated land may not always be appropriate or practical: in remediating contaminated land it may be appropriate to move soil to another location depending on where it is situated and how that land is to be used.</li> <li>• The emphasis should be on avoiding risks to human health or the environment.</li> </ul>
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	<ul style="list-style-type: none"> <li>• Add the following objective: "Significant industry activities and physical resources are provided for".</li> <li>• Add the following policy: "Recognising and providing for significant industry activities and physical resources Recognising and providing for significant industry activities and physical resources, by: a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety; b) Protecting significant industry activities from inappropriate subdivision, use, and development; c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated."</li> <li>• Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to:</li> </ul>	Regionally Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and cultural well-being; b) Protect significant industry activities from inappropriate subdivision, use, and development; c) Enable significant industry activities and development that does not have a significant adverse effect on the environment; d) Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance."	
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Amend	Amend as follows: " <del>Sometimes, e</del> Existing businesses may be placed at risk by pressure to change <del>activities are susceptible to reverse sensitivity effects, particularly when</del> land use changes <del>to activities that may compete or conflict, creating reverse sensitivities.</del> "	No reason given.
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows: "Many <del>natural and physical</del> resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users."	No reason given.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend as follows: "Maintain and <del>where possible,</del> enhance public access to the natural environment, including to the coast, lakes, rivers and their margins, and areas of cultural or historic significance, unless restricting access is necessary to: ... b) Protect the <del>natural heritage and ecosystem</del> values of sensitive natural areas or habitats; or..."	No reason given.
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: " <u>Significant h</u> Historic heritage resources are recognised and contribute to the region's character and sense of identity".	No reason given.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: " <u>Manage historic heritage values to p</u> rotect <del>and enhance</del> the values of places and areas of historic heritage <u>from inappropriate development</u> , by: ... c) Avoiding <u>remedying or mitigating</u> adverse effects on those values which contribute to the area or place being of regional or national significance; and <del>d) Avoiding significant adverse effects on other values of areas and places of historic heritage; and</del> e) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> f) <del>Remediating, when adverse effects on other values cannot be avoided; and</del>	<ul style="list-style-type: none"> <li>• The PRPS does not correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				g) Mitigating when adverse effects on other values cannot be avoided or remediated; and h) ..."	
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows: <del>"Managing for rural- Protecting regionally significant industry activities from inappropriate subdivision, use and development</del> Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling <u>regionally significant industry activities</u> , <del>farming and other rural activities that support the rural economy</del> ; and b) Minimising the loss of <u>regionally significant soils -highly valued for their versatility for primary production</u> ; and c) Restricting the establishment of activities <del>in rural areas</del> that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u> ; and d) <del>Minimising</del> <u>Restricting</u> the subdivision of productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and e) Providing for other activities that have a functional need to locate in rural areas <del>including tourism and recreational activities that are of a nature and scale compatible with rural activities</del> ."	<ul style="list-style-type: none"> <li>• Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.</li> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> </ul>
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Amend	Amend as follows: "Recognising <u>and providing for</u> the values of Otago's central business districts Recognise <u>and provide for</u> the values of Otago's central business districts, including as the primary focal point for social, cultural and economic activities within a community."	No reason given.
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	Amend as follows: "Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of <del>the Otago's</del> central business districts and support local commercial needs, by: a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and ... c) Avoiding unplanned extension of commercial activities that has significant adverse effects on <del>the a</del> central business district, including on the efficient use of infrastructure, employment and services; and ..."	No reason given.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	Amend as follows: "Manage the finite nature of land suitable and available for industrial activities, by: a) Providing specific areas to accommodate <del>the effects of</del> industrial activities; and b) Providing a range of land suitable for	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				different industrial activities <del>including land extensive activities</del> ; and c) Restricting the establishment of activities in industrial areas that may result in: i. Reverse sensitivity effects <u>on industrial activities</u> ; or ii. Inefficient use of industrial land or infrastructure."	
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend as follows: "Managing locational needs for mineral and gas exploration, extraction and processing Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Giving preference to avoiding their location in</del> <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> : i. ... b) Restricting the establishment of <del>these</del> activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities</u> ."	No reason given.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in</del> : ... e) <del>Assessing the significance of adverse effects on these values, as detailed in Schedule 3; and,</del> ... g) Considering the use of offsetting, or compensatory measures, <u>to address</u> <del>for</del> residual adverse effects <u>on the environment</u> ; and ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values <del>only</del> when: a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and b) Those <u>adverse</u> effects cannot be avoided, remedied or mitigated; and c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."	<ul style="list-style-type: none"> <li>• The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection.</li> <li>• Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Amend as follows: " <u>Providing for</u> <del>o</del> Offsetting <del>for</del> <u>from</u> adverse	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				effects on indigenous biodiversity Provide for offsetting <del>for from adverse effects</del> on indigenous biodiversity, when <del>it is enabled,</del> by ensuring that: a) The offset achieves no net loss <del>and preferably a net gain</del> in indigenous biodiversity values; and b) The offset is undertaken close to the location of development, <del>where this will result in the best ecological outcome; and...</del>	
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	Add the following method: "1.1.4 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."	No reason given.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<ul style="list-style-type: none"> <li>Amend Method 1.2.1 as follows: "Identify <del>and protect from inappropriate subdivision, use and development,</del> places, areas or landscapes of cultural, spiritual or traditional significance to them;".</li> <li>Amend Method 1.2.2 as follows: "Identify, and protect <del>from inappropriate subdivision, use and development,</del> the values that contribute to their significance;".</li> <li>Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</li> </ul>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Oppose	Delete Method 1.4.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Oppose	Delete Method 2.2	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Oppose	Delete Method 2.3.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting <del>from inappropriate subdivision, use and development,</del> historic heritage places <del>or</del> areas <del>or</del> landscapes located in the beds of rivers, lakes and wetlands or the coastal marine area;"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.12.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing	Amend	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7.	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		district plans			<ul style="list-style-type: none"> <li>• Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>• Unnecessary or ambiguous ("may").</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend Method 4.2.1 as follows: "City or district councils will implement Policies 3.2.2 and 3.2.3 <u>to the extent applicable</u> when undertaking natural hazard assessments".	No reason given.
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend Method 6.1.2 as follows: "Regional, city and district councils, in their areas of responsibility, will identify: ... -d) <u>Special amenity landscapes;</u> ... <u>g) Regionally significant soil resources;</u> <u>h) Significant infrastructure;</u> "	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. Too high a level of protection could have adverse effects on the economic and social wellbeing of communities.</li> <li>• Significant infrastructure should be defined, recognised and provided for.</li> </ul>
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Oppose	Delete Method 7.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
211	Method 8 - Education and Information	Method 8.1.1 - Information from regional, district and city councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
214	Method 8 - Education and Information	Method 8.1.4 - Information from city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
215	Method 9 - Funding	Method 9 - Funding	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
220	Method 11 - Advocacy and Facilitation	Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional	Oppose	Delete Methods.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Amend d) as follows: "d) Facilitate coordination between <del>lifeline utilities</del> <u>significant infrastructure and significant community facilities used</u> for emergency management, including by:	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				i) Recognising the interconnections between <u>significant infrastructure - lifeline utilities;...</u> "	
225	Method 11 - Advocacy and Facilitation	Method 11.2.3 - Facilitation by regional, city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
248	Appendices	Appendices - general	Oppose	<ul style="list-style-type: none"> <li>• Delete Appendix 1.</li> <li>• Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS.</li> </ul>	<ul style="list-style-type: none"> <li>• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and</li> <li>• Is not required by RMA S62 or is not an active directive.</li> </ul>
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>• Add the following definitions: <ul style="list-style-type: none"> <li>• Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance;</li> <li>• Significant Community Facility - include facilities that provide essential community services; <ul style="list-style-type: none"> <li>• Urban;</li> <li>• Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS;</li> <li>• Regionally Significant Industry Activity - include any activity associated with tourism or primary production;</li> <li>• Hard mitigation measures;</li> </ul> </li> <li>• Amend definition of Kai Tahu to clarify if has the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning documents outside Otago.</li> </ul> </li> </ul>	To reduce ambiguity and enable more efficient implementation of the PRPS.
250	Glossaries	Glossary of Te Reo terms	Oppose	Delete and include these terms in the Glossary.	Unnecessary to have 2 separate glossaries.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	<p>Delete or amend text that:</p> <ul style="list-style-type: none"> <li>• Is duplicated;</li> <li>• Is vague or ambiguous;</li> <li>• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation;</li> <li>• Is not required by RMA S62 or is not an active directive; and</li> <li>• Delete all "need" statements.</li> </ul>	<ul style="list-style-type: none"> <li>• Efficiency gains in removing unnecessary provisions.</li> <li>• Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>• "Need" statements are not required by RMA S62 or is not an active directive.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	• Any consequential or other amendments required to give effect, or like effect, to any matter raised in the submission.	No reason given.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	• Retention of all provisions as notified, except as requested in the submission.	No reason given.
6	Overall approach	Schedule 3 - Significance threshold	Oppose	<ul style="list-style-type: none"> <li>• Delete; or</li> <li>• Amend so it is consistent with case law and insert new criteria to reflect the need to consider offsetting or compensation and to reflect environmental/planning context on a case-by-</li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• The S32 report does not evaluate Schedule 3.</li> <li>• Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>case basis, e.g.:</p> <ul style="list-style-type: none"> <li>• 11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly offset or otherwise compensated, and consequently reducing the significance of the effect.</li> <li>• 12. Environmental Context: The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</li> <li>• 13. Matters of national importance and national significance: The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA. The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS."</li> </ul>	<p>significant.</p> <ul style="list-style-type: none"> <li>• Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.</li> </ul>
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Amend	Amend as follows: "The principles of Te Tiriti o Waitangi are <u>identified and</u> taken into account in resource management decisions".	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	<p>Amend as follows: "Policy 1.1.2 <u>Identifying and</u> <del>Taking</del> the principles of Te Tiriti o Waitangi into account</p> <p>Ensure that local authorities <del>exercise their functions and powers, to</del> <u>take into account the principles of Te Tiriti o Waitangi identified in Appendix 1A by:</u></p> <ul style="list-style-type: none"> <li>a) <u>Providing</u> <del>Accord</del> Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,</li> <li>b) <del>Involve</del> <u>Involving</u> Kai Tahu in resource management decision-making processes and implementation; and</li> <li>c) <del>Take</del> <u>Taking</u> into account Kai Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taoka ; and</li> <li>d) <del>Ensure</del> <u>Ensuring</u> Kai Tahu have the prerogative to: <ul style="list-style-type: none"> <li>i. <del>Identify</del> <u>Identifying</u> their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and</li> <li>ii. <del>Determine</del> <u>Determining</u> how best to express that relationship; and</li> </ul> </li> <li>e) <del>Ensure</del> <u>Ensuring</u> Kai Tahu are able to exercise kaitiakitaka; and</li> <li>f) <del>Ensure</del> <u>Ensuring</u> that district and regional plans: <ul style="list-style-type: none"> <li>i. <del>Give</del> <u>Giving</u> effect to the Ngai Tahu Claims Settlement Act 1998; and</li> <li>ii. <del>Recognise</del> <u>Recognising</u> and <del>provide</del></li> </ul> </li> </ul>	Use wording of RMA Part 2.



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				<u>providing</u> , for statutory acknowledgement areas, as detailed in Schedule 2; and iii. <del>Provide</del> <u>Providing</u> for other areas in Otago that are recognised as significant to Kai Tahu in a manner similar to that prescribed for statutory acknowledgement areas."	
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Objective 1.2 Kai Tahu values, rights and interests and customary resources are <u>identified and</u> sustained."	No reason given.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) Ensuring <u>sustainable management of</u> resources supports <del>their</del> customary uses and cultural values (as detailed in Schedules 1A and B); and"	No reason given.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> on those values and sites <del>, as detailed in Schedule 3;</del> and"	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<ul style="list-style-type: none"> <li>• Amend b) as follows: "b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and"</li> <li>• Delete c).</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Specify or identify "other cultural values" referred to in other parts of the RPS in Schedule 1A.	No reason given.
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	Amend Issue as follows: "Degradation of <u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time <del>will</del> <u>can</u> cause serious damage."	Regional issues include natural resource management issues.
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected <u>from inappropriate subdivision, use and development</u> ."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <del>Natural</del> <u>Environmental</u> systems <u>and resources</u> are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely affects the <u>environmental</u> value of another..."	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural <del>and physical</del> resources are recognised, <u>and protected from inappropriate subdivision, use</u>	<ul style="list-style-type: none"> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<del>and development</del> <del>maintained and enhanced.</del> "	and development.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to: ... c) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... j) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and k) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and l) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ... b) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and ... g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... g) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and h) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend b) as follows: "b)Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those</u> soils, to: ... f) <del>Retain</del> <u>Ensure the primary use of regionally significant soil resources is</u> for primary	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> <li>• Protecting highly valued soils over urban growth and development is</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				production purposes ; and g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and ... k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u> ; and ..."	not appropriate for all rural parts of the region.
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Amend c) iii. as follows: "iii. Historical <del>and heritage</del> associations".	No reason given.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• As applies to all landscape assessments, including for "Special Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Add the following new policy: " <u>Managing cross boundary landscape effects Promote alignment of District Plans and integrated assessments of environmental effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries.</u> "	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries, which would benefit from a regionally integrated approach.</li> <li>• This proposed policy would be as effective as the provisions on Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: " <del>Protect and enhance</del> <u>Manage subdivision, use and development that affects</u> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects <del>on these values which contribute</del> <u>which will result in</u> to the area or habitat <u>losing its</u> <del>being</del> significant <u>status</u> ; and b) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on other values of the area or habitat; and <del>c) Assessing the significance of adverse effects on these values, as detailed in Schedule 3; and</del> ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes <del>using the attributes as detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• These attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• Schedule 4 should be deleted</li> </ul>
46	Highly valued natural resources -	Policy 2.2.4 - Managing	Amend	Amend as follows: " <del>Protect, enhance and</del>	<ul style="list-style-type: none"> <li>• Could disrupt the balance of the values of outstanding natural</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	landscapes & natural features	outstanding natural features, landscapes and seascapes		<p>restore- <u>Manage subdivision, use and development that affects</u>, the values of outstanding natural features, landscapes and seascapes, by:</p> <p>a) Avoiding adverse effects <del>on those values which contribute to</del> <u>which will result in the loss of the</u> significance of the natural feature, landscape or seascape; and</p> <p>...</p> <p><del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del></p> <p>...</p> <p><u>g) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values</u></p> <p><u>(h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate</u>".</p>	<p>landscapes and features and other important values.</p> <ul style="list-style-type: none"> <li>• For example, ski fields are appropriate to locate in alpine environments that may be considered outstanding natural landscapes.</li> <li>• Ensuring such businesses can continue to operate and provide an important recreational and economic resource to Otago should be borne in mind.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding <del>using the attributes detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of different criteria being used in current or proposed district plans, and hence, creating inefficiencies and potentially slowing down forthcoming district plan reviews. These concerns also relation to Schedule 4.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social wellbeing of communities.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	<p>Amend as follows: "<del>Protect or enhance the values of</del> <u>Manage</u> special amenity landscapes and highly valued natural features, by:</p> <p>a) Avoiding <del>remedying or mitigating significant</del> adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and</p> <p><del>b) Avoiding, remedying or mitigating other adverse effects on other values; and</del></p> <p><del>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del></p> <p>...</p> <p><u>g) Recognising and providing for the use of such resources including as places where productive activities, tourism, recreation, infrastructure, homes and work places are located.</u></p> <p><u>h) Allowing values to adapt over time as communities and economies change.</u>"</p>	<ul style="list-style-type: none"> <li>• Level of protection not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it.</li> <li>• Better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category.</li> <li>• The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal	Amend	Amend as follows: "Preserve or enhance the natural character values of the coastal	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		environment		environment, by: a) Avoiding adverse effects <u>of activities on natural character in areas of the coastal environment with</u> <del>on those values which contribute to the</del> outstanding natural character of an area; and b) Avoiding significant adverse effects <u>and avoiding remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment</u> <del>on those values which contribute to the high natural character values of an area; and</del> c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and d) <u>Avoiding, remedying or mitigating other adverse effects on other values;</u> and..."	<ul style="list-style-type: none"> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend as follows: " <del>Protect</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding water bodies and wetlands by: a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> , including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and ... <del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	Amend as follows: "Policy 2.2.14 Identifying <del>highly valued</del> <u>regionally significant</u> soil resources Identify areas and values of <del>highly valued</del> <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Amend as follows: "Policy 2.2.15 Managing <del>highly valued</del> <u>regionally significant</u> soil resources Protect the values of <del>areas of highly valued</del> <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on those values which contribute to the soil being <del>highly valued</del> <u>regionally significant</u> ; and ... <del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> d) Recognising that <u>loss of regionally significant soils to urban expansion development</u> may be appropriate <u>near</u> <del>due to location and proximity to</del> existing urban development <u>, and infrastructure</u> <del>particularly when there is a lack of supply of land available for urban development</del> ."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
58	Objectives on high quality natural	Objective 2.3 - Natural resource	Amend	Amend as follows: " <del>Natural resource</del> <u>sSystems</u>	No reason given.

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	resources	systems and their interdependencies are recognised		and their interdependencies are recognised"	
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Add the following policy: " <u>Applying an integrated management approach for significant infrastructure and activities that affect significant infrastructure</u> <u>Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure, by:</u> a) <u>Promoting consistent corridor management throughout the region.</u> "	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>Amend a) as follows: "a) Taking into account the impacts of management of one resource on the <u>environmental values</u> of another, or on the environment in general; and"</li> <li>Add the following clauses: " c) <u>Ensuring that resource objectives are complementary across administrative boundaries; and</u> d) <u>Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete policy.	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
66	Objectives on resilience, health and safety	Issue 3.1 - Risk of overreaching the environment's carrying capacity	Amend	Amend as follows: "Activities that <u>utilise resources</u> <del>are undertaken</del> without regard to their <del>local</del> <u>environmental values</u> <del>are at greater risk</del> <u>inappropriately compromising</u> <del>of overreaching that</del> <u>the</u> environment's ability to sustain the activity."	No reason given.
70	Objectives on resilience, health and safety	Issue 3.5 - Importance of infrastructure of regional or national significance	Amend	Amend as follows: " <u>It is important to recognise and provide for Significant Infrastructure</u> <del>of regional and national significance</del> <u>even though it may result in</u> <del>local</del> adverse environmental <u>effects</u> <del>impacts, or adversely affect other nationally important values...</del> "	Significant infrastructure should be defined, recognised and provided for.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of <del>natural and physical</del> resources recognises environmental constraints".	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising <del>natural and physical</del> environmental constraints Recognise the <del>natural and physical</del> environmental constraints of <u>resources</u> <del>an area</del> , the <u>environmental</u> effects of those constraints on activities <u>utilising those resources</u> , and the <u>environmental</u> effects of those activities on those constraints, <del>including with particular recognition of :</del>	No reason given.

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				... c) The sensitivity of <del>the natural and physical</del> resources to adverse effects from the proposed activity/land use; and ..."	
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Amend Objective 3.2 as follows: " <u>Inappropriate</u> risk that natural hazards pose to Otago's communities are minimised"	Designing to a 100 year level may be appropriate, but it would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities <del>including hazards of low likelihood and high consequence.</del> "	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows: "Manage natural hazard risk, <del>including</del> with <u>particular</u> regard to: a) The risk <del>they</del> posed, considering the likelihood and consequences of natural hazard events; and ..."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend 1st sentence as follows: "Assess activities <u>in areas known to be subject to an identified</u> , <del>for</del> natural hazard risk, by considering:..."	No reason given.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Policy 3.2.6 Avoiding increased natural hazard risk <u>from inappropriate subdivision, use and development</u> Avoid <u>remedy or mitigate increased</u> <del>increasing</del> natural hazard risk <u>from inappropriate subdivision, use and development</u> , including by:..."	<ul style="list-style-type: none"> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• It would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).</li> </ul>
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend 1st sentence as follows: "Reduce existing natural hazard risk, <del>including particularly</del> by:"	No reason given.
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) There is significant <del>public or environmental</del> benefit in doing so; or b) The work relates to the functioning ability of <u>significant infrastructure, a lifeline utility, or facility used for essential or emergency services, or a significant community facility.</u> "	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ... b) Designing infrastructure to take into account: ... iv. <del>Natural and physical</del> Resource constraints; and v. Effects on the values of natural and physical resources; and ... c) Managing urban growth <u>in a coordinated manner to ensure</u> : i. <del>Within areas that have</del> sufficient	<ul style="list-style-type: none"> <li>• Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community costs than benefits in high growth areas.</li> <li>• Regulation of the release of land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				infrastructure <u>services are provided</u> -capacity; or ii. <del>Where infrastructure services can be upgraded or extended</del> efficiently and effectively ; and d) <del>Co-ordinating the design and development of infrastructure with the staging of land use change, including with:</del> i. <del>Structural design and release of land for new urban development;</del> or ii. <del>Structural redesign and redevelopment within existing urban areas ."</del>	
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend as follows: "Manage infrastructure activities, to: ... b) <del>Reduce</del> <u>Avoid, remedy or mitigate</u> adverse effects of those activities, including cumulative adverse effects on <del>natural and physical</del> resources; and c) Support economic, social and community <u>needs</u> -activities; and d) Improve efficiency of use of <del>natural</del> resources; and e) Protect infrastructure corridors <u>from inappropriate subdivision, uses and development</u> <del>for infrastructure needs, now and for the future</del> ; and ... g) Protect the functioning of <u>significant infrastructure</u> <del>lifeline utilities</del> and essential or emergency services."	Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend as follows: "Policy 3.4.3 Designing <del>lifeline utilities</del> <u>significant infrastructure</u> and facilities for essential or emergency services Design <del>lifeline utilities</del> <u>significant infrastructure</u> , and facilities for essential or emergency services, to:..."	No reason given.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	• Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, <del>lifeline utilities</del> , <u>significant infrastructure</u> , and essential and emergency services". • Delete d).	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend as follows: " <u>Significant</u> Infrastructure of <del>national and regional significance</del> <u>is recognised and provided for</u> managed in a sustainable way."	Significant infrastructure should be defined, recognised and provided for.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend as follows: "Policy 3.5.1 Recognising <u>and providing for</u> national and regional significance of infrastructure Recognise <u>and provide for</u> the <del>national and regional</del> significance of the following infrastructure: a) Renewable electricity generation facilities <del>where they supply the national electricity grid</del>	<ul style="list-style-type: none"> <li>• Significant infrastructure should be defined, recognised and provided for.</li> <li>• The PRPS does not give enough recognition of and provision for the tourism sector.</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				and local distribution network; and ... f) Structures for transportation by rail <u>and tourism activities</u> ."	
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend as follows: "Policy 3.5.2 Managing adverse effects of <u>significant</u> infrastructure <del>that has national or regional significance</del> <del>Minimise</del> <u>Avoid, remedy or mitigate</u> adverse effects from <u>significant</u> infrastructure <del>that has national or regional significance</del> , by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in:</del> ... b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding</del> <u>minimising</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and ... <del>d) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> e) <del>Considering</del> <u>Enabling infrastructure providers to employ</u> the use of offsetting, or other compensatory measures <u>to address</u> , <del>for</del> residual adverse effects on <u>the environment indigenous biodiversity</u> ."	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Protecting <u>significant</u> infrastructure <del>of national or regional significance</del>".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	Amend as follows: "Policy 3.6.2 Promoting small <u>and community</u> scale renewable electricity generation Promote small <u>and community</u> scale renewable electricity generation activities that : a) <del>Increase the local community's resilience and security of energy supply; and</del> b) <del>Avoid, remedy or mitigate adverse effects from that activity</del> ."	No reason given.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	<ul style="list-style-type: none"> <li>Amend 1st sentence as follows: "Protect the generation capacity of <u>nationally or regionally significant</u> renewable electricity generation activities, by..."</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	Amend as follows: <ul style="list-style-type: none"> <li>Delete d).</li> <li>"e) Protecting <del>existing</del> distribution corridors for infrastructure needs, now and for the future."</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles	Amend	Amend as follows: "Encourage the use of good	<ul style="list-style-type: none"> <li>Schedule 6 not assessed in S32 report.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		of good urban design		urban design principles in subdivision and development in urban areas, as detailed in Schedule 6, to: ... b) Ensure that the built form relates well to its surrounding natural environment, including by: i. Reflecting natural features such as rivers, lakes, wetlands and topography; and ii. Providing for ecological corridors in urban areas; and iii. Protecting areas of indigenous biodiversity and habitat for indigenous fauna; and iv. Encouraging use of low impact design techniques; and v. Encouraging construction of warmer buildings; and ...	<ul style="list-style-type: none"> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend a) as follows: "a) <del>Maximising</del> Optimising passive solar gain; and"	No reason given.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend as follows: "Design <u>and maintain</u> public spaces, including streets and open spaces, to <u>provide for a range of uses and</u> meeting the reasonable access and mobility needs of all sectors within the community, <del>including the young and those with mobility impairments.</del> "	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Amend as follows: "Policy 3.8.1 <del>Managing</del> <u>Providing</u> for urban growth <del>Manage</del> <u>Provide for</u> urban growth and creation of new urban land in a strategic and co-ordinated way, by: a) <del>Understanding demand and supply of</del> <u>Ensuring there is sufficient</u> residential, commercial and industrial <u>zoned</u> land capacity, <del>to</del> <u>and catering for that</u> demand <del>for such land, projected over at least the next 10 years;</del> and b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to: i. Provide infrastructure in an efficient and effective way; and ii. <del>Avoid</del> <u>Discouraging</u> additional costs <u>on the public</u> that arise from unplanned infrastructure expansion; and c) Identifying future growth areas that: i. Minimise <u>significant</u> adverse effects on <del>rural the productivity of the rural and tourism sectors,</del> <u>including loss of highly valued soils or creating competing urban demand for water and</u>	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community.</li> <li>• Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS.</li> <li>• "Considering the need for urban growth boundaries" should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential methods.</li> <li>• "Avoidance" of natural hazards needs to be widened to "avoid,</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>other resources; and</p> <p>ii. <u>Can be developed without resulting in significant adverse effects on any matter of national importance or national significance. Maintain or enhance significant biodiversity, landscape or natural character values; and</u></p> <p><del>iii. Maintain important cultural or heritage values; and</del></p> <p><del>iv.</del> iii. Avoid land with significant risk from natural hazards <u>which cannot be remedied or mitigated</u>; and</p> <p>d) Considering the need for urban growth boundaries to control <u>potentially inappropriate</u> urban expansion; and</p> <p>e) Ensuring efficient use of land; and</p> <p>f) Requiring the use of low or no-emission heating systems in buildings, <del>when</del> <u>where</u> ambient air quality <del>in or near the growth area</del> is:</p> <p>i. Below standards for human health; or</p> <p>ii. Vulnerable to degradation given the local climatic and geographical context; and</p> <p>g) Giving effect to the principles of good urban design <del>, as detailed in Schedule 6;</del> and</p> <p>h) Giving effect to the principles of crime prevention through environmental design</p>	<p>remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</p> <ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	Delete the policy.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>social effects.</p> <ul style="list-style-type: none"> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<p>Amend as follows: "Manage subdivision, use and development of rural land, to:</p> <p>a) Avoid <del>inappropriate</del> development or fragmentation of land, <del>particularly</del> which undermines or forecloses the potential of rural land:</p> <p>i. For primary production <u>or tourism</u>; or ...</p> <p>b) Have particular regard to whether the proposal will result in a loss of the productive potential of <u>regionally significant</u> <del>highly versatile</del> soils, unless:</p> <p>i. The land adjoins an existing urban area and there is no other land suitable for urban expansion <u>, or there is a shortage of land available for urban development</u>; and</p> <p>ii. <del>There highly versatile soils are needed for urban expansion,</del> any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and</p> <p>iii. reverse sensitivity effects on rural productive activities can be <u>satisfactorily</u> avoided; and</p> <p>c) Avoid unplanned demand for provision of <u>public infrastructure investment</u>, including domestic water supply and waste disposal; and</p> <p>d) Avoid creating <u>significant</u> competing demand for water <del>or other</del> resources."</p>	<ul style="list-style-type: none"> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	<p>Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk</u> <del>harm</del> human health or the quality of the environment <del>in Otago</del>".</p>	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	<p>Amend c) as follows: "c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and".</p>	No reason given.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	<p>Amend a) as follows: "a) Prior to subdivision or development of potentially contaminated land, <u>requiring</u> <del>ensuring</del> a site investigation is undertaken to determine the nature or extent of any contamination; and"</p>	No reason given.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	<p>Amend as follows: "Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably degrade natural values</u>".</p>	<ul style="list-style-type: none"> <li>• Avoiding the creation of new contaminated land may not always be appropriate or practical: in remediating contaminated land it may be appropriate to move soil to another location depending on where it is situated and how that land is to be used.</li> <li>• The emphasis should be on avoiding risks to human health or the environment.</li> </ul>

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137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	<ul style="list-style-type: none"> <li>• Add the following objective: "Significant industry activities and physical resources are provided for".</li> <li>• Add the following policy: "Recognising and providing for significant industry activities and physical resources Recognising and providing for significant industry activities and physical resources, by: a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety; b) Protecting significant industry activities from inappropriate subdivision, use, and development; c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated."</li> <li>• Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to: a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and cultural well-being; b) Protect significant industry activities from inappropriate subdivision, use, and development; c) Enable significant industry activities and development that does not have a significant adverse effect on the environment; d) Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance."</li> </ul>	Regionally Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Amend	Amend as follows: " <del>Sometimes, e</del> Existing businesses may be placed at risk by pressure to change - activities are susceptible to reverse sensitivity effects, particularly when land use changes -to activities that may compete or conflict, creating reverse sensitivities-."	No reason given.
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows: "Many <del>natural and physical</del> resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users."	No reason given.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend as follows: "Maintain and <del>where possible,</del> enhance public access to the natural environment, including to the coast, lakes,	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				rivers and their margins, and areas of cultural or historic significance, unless restricting access is necessary to: ... b) Protect the <del>natural heritage and ecosystem</del> values of sensitive natural areas or habitats; or..."	
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: " <u>Significant h</u> Historic heritage resources are recognised and contribute to the region's character and sense of identity".	No reason given.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: " <u>Manage historic heritage values to p</u> Protect <del>and enhance</del> the values of places and areas of historic heritage <u>from inappropriate development</u> , by: ... c) Avoiding <u>remedying or mitigating</u> adverse effects on those values which contribute to the area or place being of regional or national significance; and <del>d) Avoiding significant adverse effects on other values of areas and places of historic heritage; and</del> e) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> f) <del>Remediating, when adverse effects on other values cannot be avoided; and</del> g) <del>Mitigating when adverse effects on other values cannot be avoided or remediated; and</del> h) ..."	<ul style="list-style-type: none"> <li>• The PRPS does not correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows: " <del>Managing for rural- Protecting regionally significant industry activities from inappropriate subdivision, use and development</del> Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling <u>regionally significant industry activities</u> <del>, farming and other rural activities that support the rural economy;</del> and b) Minimising the loss of <u>regionally significant soils</u> <del>highly valued for their versatility for primary production;</del> and c) Restricting the establishment of activities <del>in rural areas</del> that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u> ; and d) <del>Minimising- Restricting</del> the subdivision of productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and e) Providing for other activities that have a functional need to locate in rural areas <del>, including tourism and recreational activities that are of a nature and scale compatible with rural activities.</del> "	<ul style="list-style-type: none"> <li>• Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.</li> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> </ul>
157	Land management for economic	Policy 4.3.3 - Recognising the	Amend	Amend as follows:	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	production	values of Otago's central business districts		"Recognising <del>and providing for</del> the values of Otago's central business districts Recognise <del>and provide for</del> the values of Otago's central business districts, including as the primary focal point for social, cultural and economic activities within a community."	
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	Amend as follows: "Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of <del>the Otago's</del> central business districts and support local commercial needs, by: a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and ... c) Avoiding unplanned extension of commercial activities that has significant adverse effects on <del>the a</del> central business district, including on the efficient use of infrastructure, employment and services; and ..."	No reason given.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	Amend as follows: "Manage the finite nature of land suitable and available for industrial activities, by: a) Providing specific areas to accommodate <del>the effects of</del> industrial activities; and b) Providing a range of land suitable for different industrial activities <del>, including land extensive activities</del> ; and c) Restricting the establishment of activities in industrial areas that may result in: i. Reverse sensitivity effects <u>on industrial activities</u> ; or ii. Inefficient use of industrial land or infrastructure."	No reason given.
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend as follows: "Managing locational needs for mineral and gas exploration, extraction and processing Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Giving preference to avoiding their location in</del> <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> : i. ... b) Restricting the establishment of <del>these</del> activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities</u> ."	No reason given.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and	Amend	Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by:	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		processing		<p>a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> -Giving preference to avoiding their location in:-</p> <p>...</p> <p>e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and,</p> <p>...</p> <p>g) Considering the use of offsetting, or compensatory measures, <u>to address</u> -for residual adverse effects <u>on the environment</u>; and</p> <p>..."</p>	
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	<p>Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values <del>only</del> when:</p> <p>a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and</p> <p>b) Those <u>adverse</u> effects cannot be avoided, remedied or mitigated; and</p> <p>c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."</p>	<ul style="list-style-type: none"> <li>The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection.</li> <li>Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	<p>Amend as follows:</p> <p><del>"Providing for offsetting for from adverse effects on</del> indigenous biodiversity</p> <p>Provide for offsetting <del>for from adverse effects</del> on indigenous biodiversity, when <del>it is enabled,</del> by ensuring that:</p> <p>a) The offset achieves no net loss <del>and preferably a net gain</del> in indigenous biodiversity values; and</p> <p>b) The offset is undertaken close to the location of development <del>, where this will result in the best ecological outcome</del>; and..."</p>	No reason given.
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	<p>Add the following method: "1.1.4 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</p>	No reason given.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<ul style="list-style-type: none"> <li>Amend Method 1.2.1 as follows: "Identify <del>and protect from inappropriate subdivision, use and development,</del> places, areas or landscapes of cultural, spiritual or traditional significance to them;".</li> <li>Amend Method 1.2.2 as follows: "Identify, and protect <del>from inappropriate subdivision, use and development,</del> the values that contribute to their significance;".</li> <li>Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</li> </ul>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Oppose	Delete Method 1.4.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction,</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					strengthen the PRPS & result in efficiency gains.
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Oppose	Delete Method 2.2	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Oppose	Delete Method 2.3.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting <u>from inappropriate subdivision, use and development</u> , historic heritage places <u>or</u> areas <del>or landscapes</del> located in the beds of rivers, lakes and wetlands or the coastal marine area;"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.12.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7.	<ul style="list-style-type: none"> <li>• Efficiency gains in removing unnecessary provisions.</li> <li>• Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>• Unnecessary or ambiguous ("may").</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend Method 4.2.1 as follows: "City or district councils will implement Policies 3.2.2 and 3.2.3 <u>to the extent applicable</u> when undertaking natural hazard assessments".	No reason given.
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend Method 6.1.2 as follows: "Regional, city and district councils, in their areas of responsibility, will identify: ...	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				-d) <u>Special amenity landscapes;</u> ... <u>g) Regionally significant soil resources;</u> <u>h) Significant infrastructure;</u> "	<ul style="list-style-type: none"> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. Too high a level of protection could have adverse effects on the economic and social wellbeing of communities.</li> <li>• Significant infrastructure should be defined, recognised and provided for.</li> </ul>
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Oppose	Delete Method 7.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
211	Method 8 - Education and Information	Method 8.1.1 - Information from regional, district and city councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
214	Method 8 - Education and Information	Method 8.1.4 - Information from city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
215	Method 9 - Funding	Method 9 - Funding	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
220	Method 11 - Advocacy and Facilitation	Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional	Oppose	Delete Methods.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Amend d) as follows: "d) Facilitate coordination between <del>lifeline utilities - significant infrastructure and significant community facilities used</del> for emergency management, including by: i) Recognising the interconnections between <del>significant infrastructure - lifeline utilities - ...</del> "	No reason given.
225	Method 11 - Advocacy and Facilitation	Method 11.2.3 - Facilitation by regional, city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
248	Appendices	Appendices - general	Oppose	<ul style="list-style-type: none"> <li>• Delete Appendix 1.</li> <li>• Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS.</li> </ul>	<ul style="list-style-type: none"> <li>• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and</li> <li>• Is not required by RMA S62 or is not an active directive.</li> </ul>
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>• Add the following definitions: <ul style="list-style-type: none"> <li>• Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance;</li> <li>• Significant Community Facility - include facilities that provide essential community services; <ul style="list-style-type: none"> <li>• Urban;</li> </ul> </li> <li>• Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS;</li> <li>• Regionally Significant Industry Activity - include any activity associated with tourism or primary production; <ul style="list-style-type: none"> <li>• Hard mitigation measures;</li> </ul> </li> </ul> </li> <li>• Amend definition of Kai Tahu to clarify if has the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning</li> </ul>	To reduce ambiguity and enable more efficient implementation of the PRPS.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				documents outside Otago.	
250	Glossaries	Glossary of Te Reo terms	Oppose	Delete and include these terms in the Glossary.	Unnecessary to have 2 separate glossaries.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Delete or amend text that: <ul style="list-style-type: none"> <li>• Is duplicated;</li> <li>• Is vague or ambiguous;</li> <li>• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation;</li> <li>• Is not required by RMA S62 or is not an active directive; and</li> <li>• Delete all "need" statements.</li> </ul>	<ul style="list-style-type: none"> <li>• Efficiency gains in removing unnecessary provisions.</li> <li>• Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>• "Need" statements are not required by RMA S62 or is not an active directive.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	• Any consequential or other amendments required to give effect, or like effect, to any matter raised in the submission.	No reason given.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Whole Regional Policy Statement (general support)	Amend	• Retention of all provisions as notified, except as requested in the submission.	No reason given.
6	Overall approach	Schedule 3 - Significance threshold	Oppose	<ul style="list-style-type: none"> <li>• Delete; or</li> <li>• Amend so it is consistent with case law and insert new criteria to reflect the need to consider offsetting or compensation and to reflect environmental/planning context on a case-by-case basis, e.g.: <ul style="list-style-type: none"> <li>• 11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly offset or otherwise compensated, and consequently reducing the significance of the effect.</li> <li>• 12. Environmental Context: The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</li> <li>• 13. Matters of national importance and national significance: The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA. The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS."</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• The S32 report does not evaluate Schedule 3.</li> <li>• Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant.</li> <li>• Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.</li> </ul>
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Amend	Amend as follows: "The principles of Te Tiriti o Waitangi are <u>identified and</u> taken into account in resource management decisions".	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	Amend as follows: "Policy 1.1.2 <u>Identifying and</u> <del>F</del> aking the principles of Te Tiriti o Waitangi into account Ensure that local authorities <del>exercise their functions and powers, to</del> <u>take into account the principles of Te Tiriti o Waitangi identified in Appendix 1A by :</u>	Use wording of RMA Part 2.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>a) <del>Providing</del> <del>Accord</del> Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,</p> <p>b) <del>Involve</del> <del>Involving</del> Kai Tahu in resource management decision-making processes and implementation; and</p> <p>c) <del>Take</del> <del>Taking</del> into account Kai Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taoka ; and</p> <p>d) <del>Ensure</del> <del>Ensuring</del> Kai Tahu have the prerogative to:</p> <p>i. <del>Identify</del> <del>Identifying</del> their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and</p> <p>ii. <del>Determine</del> <del>Determining</del> how best to express that relationship; and</p> <p>e) <del>Ensure</del> <del>Ensuring</del> Kai Tahu are able to exercise kaitiakitaka; and</p> <p>f) <del>Ensure</del> <del>Ensuring</del> that district and regional plans:</p> <p>i. <del>Give</del> <del>Giving</del> effect to the Ngai Tahu Claims Settlement Act 1998; and</p> <p>ii. <del>Recognise</del> <del>Recognising</del> and <del>provide</del> <del>providing</del> for statutory acknowledgement areas, as detailed in Schedule 2; and</p> <p>iii. <del>Provide</del> <del>Providing</del> for other areas in Otago that are recognised as significant to Kai Tahu in a manner similar to that prescribed for statutory acknowledgement areas."</p>	
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Objective 1.2 Kai Tahu values, rights and interests and customary resources are <u>identified and</u> sustained."	No reason given.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) Ensuring <u>sustainable management of</u> resources supports <del>their</del> customary uses and cultural values (as detailed in Schedules 1A and B); and"	No reason given.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> , on those values and sites <del>, as detailed in Schedule 3;</del> and"	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<ul style="list-style-type: none"> <li>• Amend b) as follows: "b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and"</li> <li>• Delete c).</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Specify or identify "other cultural values" referred to in other parts of the RPS in Schedule 1A.	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	Amend Issue as follows: "Degradation of <u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time <del>will</del> <u>can</u> cause serious damage."	Regional issues include natural resource management issues.
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected <u>from inappropriate subdivision, use and development</u> ."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <del>Natural</del> <u>Environmental</u> systems <u>and resources</u> are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely affects the <u>environmental</u> value of another..."	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural <del>and physical</del> resources are recognised, <u>and protected from inappropriate subdivision, use and development</u> , <del>maintained and enhanced.</del> "	<ul style="list-style-type: none"> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to: ... c) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... j) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and k) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and l) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ... b) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and ... g) Protect Kai Tahu values <u>from inappropriate</u>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				subdivision, use and development ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and..."	
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... g) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and h) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend b) as follows: "b)Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those</u> soils, to: ... f) <del>Retain</del> <u>Ensure the primary use of regionally significant soil resources is</u> for primary production <u>purposes</u> ; and g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and ... k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Amend c) iii. as follows: "iii. Historical <del>and heritage</del> associations".	No reason given.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• As applies to all landscape assessments, including for "Special Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's	Amend	Add the following new policy:	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		significant and highly valued natural resources		<u>"Managing cross boundary landscape effects Promote alignment of District Plans and integrated assessments of environmental effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries."</u>	boundaries, which would benefit from a regionally integrated approach. <ul style="list-style-type: none"> <li>This proposed policy would be as effective as the provisions on Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: " <del>Protect and enhance Manage subdivision, use and development that affects</del> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects <del>on those values which contribute</del> which will result in to the area or habitat <del>losing its being</del> significant <del>status</del> ; and b) Avoiding significant adverse effects <del>from inappropriate subdivision, use and development</del> on other values of the area or habitat; and <del>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and ..."</del>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes <del>, using the attributes as detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>These attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>Schedule 4 should be deleted</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: " <del>Protect, enhance and restore. Manage subdivision, use and development that affects</del> the values of outstanding natural features, landscapes and seascapes, by: a) Avoiding adverse effects <del>on those values which contribute to</del> which will result in the <del>loss of the</del> significance of the natural feature, landscape or seascape; and ... <del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and ...</del> <u>g) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values</u> <u>(h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate</u> ."	<ul style="list-style-type: none"> <li>Could disrupt the balance of the values of outstanding natural landscapes and features and other important values.</li> <li>For example, ski fields are appropriate to locate in alpine environments that may be considered outstanding natural landscapes.</li> <li>Ensuring such businesses can continue to operate and provide an important recreational and economic resource to Otago should be borne in mind.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding <del>, using the attributes detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>Concerned about introducing the term of Special Amenity Landscapes.</li> <li>Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of different criteria being used in current or proposed district plans, and hence, creating inefficiencies and potentially slowing down forthcoming district plan reviews. These concerns also relation to Schedule 4.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social wellbeing of communities.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	<p>Amend as follows: "<del>Protect or enhance the values of. <u>Manage</u> special amenity landscapes and highly valued natural features, by:</del></p> <p>a) <del>Avoiding, <u>remedying or mitigating</u> significant</del> adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and</p> <p><del>b) Avoiding, <u>remedying or mitigating</u> other adverse effects on other values; and</del></p> <p>c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del></p> <p>...</p> <p><u>g) Recognising and providing for the use of such resources including as places where productive activities, tourism, recreation, infrastructure, homes and work places are located.</u></p> <p><u>h) Allowing values to adapt over time as communities and economies change.</u>"</p>	<ul style="list-style-type: none"> <li>• Level of protection not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it.</li> <li>• Better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category.</li> <li>• The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	<p>Amend as follows: "Preserve or enhance the natural character values of the coastal environment, by:</p> <p>a) <del>Avoiding adverse effects <u>of activities on natural character in areas of the coastal environment with</u> on those values which contribute to the outstanding natural character of an area; and</del></p> <p>b) <del>Avoiding significant adverse effects <u>and avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment</u> on those values which contribute to the high natural character values of an area; and</del></p> <p>c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del></p> <p>d) <del>Avoiding, remedying or mitigating other adverse effects on other values; and...</del>"</p>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	<p>Amend as follows: "<del>Protect. <u>Manage subdivision, use and development that affects</u> the values of outstanding water bodies and wetlands by:</del></p> <p>a) <del>Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> , including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and</del></p> <p>...</p> <p><del>e) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del></p> <p>..."</p>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
56	Highly valued natural resources -	Policy 2.2.14 - Identifying highly	Amend	Amend as follows:	No reason given.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	soil resources	valued soil resources		"Policy 2.2.14 Identifying <del>highly-valued regionally significant</del> soil resources Identify areas and values of <del>highly-valued regionally significant</del> soil resources, using the following criteria: ..."	
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Amend as follows: "Policy 2.2.15 Managing <del>highly-valued regionally significant</del> soil resources Protect the values of <del>areas of highly-valued regionally significant</del> soil resources, by: a) Avoiding significant adverse effects <del>from inappropriate subdivision, use and development</del> on those values which contribute to the soil being <del>highly-valued- regionally significant</del> ; and ... -c) <del>Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> d) Recognising that <del>loss of regionally significant soils to urban expansion</del> <u>development</u> may be appropriate <del>near</del> <u>near</u> <del>due to location and proximity to existing urban development, and infrastructure particularly when there is a lack of supply of land available for urban development.</del> "	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend as follows: " <del>Natural resource s</del> Systems and their interdependencies are recognised"	No reason given.
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Add the following policy: " <u>Applying an integrated management approach for significant infrastructure and activities that affect significant infrastructure</u> <u>Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure, by:</u> a) <u>Promoting consistent corridor management throughout the region.</u> "	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>• Amend a) as follows: "a) Taking into account the impacts of management of one resource on the <u>environmental</u> values of another, or on the environment in general; and"</li> <li>• Add the following clauses: " <u>c) Ensuring that resource objectives are complementary across administrative boundaries; and</u> <u>d) Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete policy.	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
66	Objectives on resilience, health and safety	Issue 3.1 - Risk of overreaching the environment's carrying capacity	Amend	Amend as follows: " <del>Activities that utilise resources are undertaken</del> without regard to their local environmental values <del>are at greater risk inappropriately compromising</del> of overreaching that <del>the</del> environment's ability to sustain the activity."	No reason given.
70	Objectives on resilience, health and safety	Issue 3.5 - Importance of infrastructure of regional or national significance	Amend	Amend as follows: " <del>It is important to recognise and provide for Significant Infrastructure of regional and national significance even though it may result in local adverse environmental effects impacts, or adversely affect other nationally important values...</del> "	Significant infrastructure should be defined, recognised and provided for.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Protection, <del>subdivision,</del> use and development of <del>natural and physical</del> resources recognises environmental constraints".	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising <del>natural and physical</del> environmental constraints Recognise the <del>natural and physical</del> environmental constraints of <del>resources</del> <del>an area</del> , the <del>environmental</del> effects of those constraints on activities <del>utilising those resources</del> , and the <del>environmental</del> effects of those activities on those constraints, <del>including with particular recognition of</del> : ... c) The sensitivity of <del>the natural and physical</del> resources to adverse effects from the proposed activity/land use; and ..."	No reason given.
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Amend Objective 3.2 as follows: " <del>Inappropriate</del> risk that natural hazards pose to Otago's communities are minimised"	Designing to a 100 year level may be appropriate, but it would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities <del>including hazards of low likelihood and high consequence</del> ."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows: "Manage natural hazard risk, <del>including</del> with <del>particular</del> regard to: a) The risk <del>they</del> posed, considering the likelihood and consequences of natural hazard events; and ..."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend 1st sentence as follows: "Assess activities <del>in areas known to be subject to an identified</del> <del>for</del> natural hazard risk, by considering:..."	No reason given.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Policy 3.2.6 Avoiding increased natural hazard risk <del>from inappropriate subdivision, use and development</del> Avoid <del>remedy or mitigate increased</del> increasing natural hazard risk <del>from inappropriate subdivision, use and development</del> "	<ul style="list-style-type: none"> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• It would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend 1st sentence as follows: "Reduce existing natural hazard risk, <del>including particularly by:</del> "	No reason given.
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) There is significant <del>public or environmental</del> benefit in doing so; or b) The work relates to the functioning ability of <u>significant infrastructure, a lifeline utility, or facility used for essential or emergency services, or a significant community facility.</u> "	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ... b) Designing infrastructure to take into account: ... iv. <del>Natural and physical r</del> Resource constraints; and v. Effects on the values of natural and physical resources; and ... c) Managing urban growth <u>in a coordinated manner to ensure</u> : i. <del>Within areas that have</del> sufficient infrastructure <u>services are provided</u> <del>capacity;</del> <del>or</del> ii. <del>Where infrastructure services can be upgraded or extended</del> efficiently and effectively ; <del>and</del> d) <del>Co-ordinating the design and development of infrastructure with the staging of land use change, including with:</del> i. <del>Structural design and release of land for new urban development;</del> or ii. <del>Structural redesign and redevelopment within existing urban areas.</del> "	<ul style="list-style-type: none"> <li>• Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community costs than benefits in high growth areas.</li> <li>• Regulation of the release of land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend as follows: "Manage infrastructure activities, to: ... b) <del>Reduce</del> <u>Avoid, remedy or mitigate</u> adverse effects of those activities, including cumulative adverse effects on <del>natural and physical</del> resources; and c) Support economic, social and community <u>needs</u> <del>activities</del> ; and d) Improve efficiency of use of <del>natural</del> resources; and e) Protect infrastructure corridors <u>from inappropriate subdivision, uses and development</u> <del>for infrastructure needs, now and for the future</del> ; and ... g) Protect the functioning of <u>significant infrastructure, lifeline utilities</u> <del>and essential or</del>	Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				emergency services."	
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend as follows: "Policy 3.4.3 Designing <del>lifeline utilities</del> <u>significant infrastructure</u> and facilities for essential or emergency services Design <del>lifeline utilities - significant infrastructure</del> , and facilities for essential or emergency services, to:..."	No reason given.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, <del>lifeline utilities -</del> <u>significant infrastructure</u>, and essential and emergency services".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend as follows: " <u>Significant</u> Infrastructure of national and regional significance is recognised and provided for <u>managed in a sustainable way</u> ."	Significant infrastructure should be defined, recognised and provided for.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend as follows: "Policy 3.5.1 Recognising <u>and providing for</u> national and regional significance of infrastructure Recognise <u>and provide for</u> the national and regional significance of the following infrastructure: a) Renewable electricity generation facilities <del>where they supply the national electricity grid and local distribution network</del> ; and ... f) Structures for transportation by rail <u>and tourism activities</u> ."	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The PRPS does not give enough recognition of and provision for the tourism sector.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend as follows: "Policy 3.5.2 Managing adverse effects of <u>significant</u> infrastructure <del>that has national or regional significance</del> <del>Minimise</del> <u>Avoid, remedy or mitigate</u> adverse effects from <u>significant</u> infrastructure <del>that has national or regional significance</del> , by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in</del> : ... b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding</del> <u>minimising</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and ... d) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> e) <del>Considering</del> <u>Enabling infrastructure providers to employ</u> the use of offsetting <del>or other compensatory measures to address</del> <del>for</del> residual adverse effects on <u>the environment</u>	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				indigenous biodiversity."	
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Protecting <u>significant</u> infrastructure <del>of national or regional significance</del>".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	<p>Amend as follows:</p> <p>"Policy 3.6.2 Promoting small <u>and community</u> scale renewable electricity generation  Promote small <u>and community</u> scale renewable electricity generation activities that :</p> <p>a) Increase the local community's resilience and security of energy supply; and  b) Avoid, remedy or mitigate adverse effects from that activity."</p>	No reason given.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	<ul style="list-style-type: none"> <li>Amend 1st sentence as follows: "Protect the generation capacity of <u>nationally or regionally significant</u> renewable electricity generation activities, by..."</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	<p>Amend as follows:</p> <ul style="list-style-type: none"> <li>Delete d).</li> <li>"e) Protecting <del>existing</del> distribution corridors for infrastructure needs, now and for the future."</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	<p>Amend as follows: "Encourage the use of good urban design principles in subdivision and development in urban areas <del>, as detailed in Schedule 6,</del> to:</p> <p>...</p> <p>b) Ensure that the built form relates well to its <u>surrounding</u> <del>natural</del> environment <del>, including by:</del></p> <p>i. <del>Reflecting natural features such as rivers, lakes, wetlands and topography; and</del>  ii. <del>Providing for ecological corridors in urban areas; and</del>  iii. <del>Protecting areas of indigenous biodiversity and habitat for indigenous fauna; and</del>  iv. <del>Encouraging use of low impact design techniques; and</del>  v. <del>Encouraging construction of warmer buildings</del> ; and  ..."</p>	<ul style="list-style-type: none"> <li>Schedule 6 not assessed in S32 report.</li> <li>Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>May be to the detriment of good urban design for specific sites.</li> </ul>
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>Schedule 6 not assessed in S32 report.</li> <li>Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>May be to the detriment of good urban design for specific sites.</li> </ul>
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend a) as follows: "a) <del>Maximising</del> <u>Optimising</u> passive solar gain; and"	No reason given.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend as follows: "Design <u>and maintain</u> public spaces, including streets and open spaces, to <u>provide for a range of uses and</u> meeting the reasonable access and mobility needs of all sectors within the community <del>, including the</del>	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("including").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	<p>Amend as follows:  <del>"Policy 3.8.1 - Managing</del> <u>Providing</u> for urban growth  <del>-Manage</del> <u>Provide for</u> urban growth and creation of new urban land in a strategic and co-ordinated way, by:</p> <p>a) <u>Understanding demand and supply of</u> <del>Ensuring there is sufficient</del> residential, commercial and industrial <u>zoned</u> land capacity, <del>to</del> <u>and catering for that</u> demand <del>for such land, projected over at least the next 10 years;</del> and</p> <p>b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to:</p> <p>i. Provide infrastructure in an efficient and effective way; and</p> <p>ii. <del>Avoid</del> <u>Discouraging</u> additional costs <u>on the public</u> that arise from unplanned infrastructure expansion; and</p> <p>c) Identifying future growth areas that:</p> <p>i. Minimise <u>significant</u> adverse effects on <del>rural the</del> <u>productivity of the rural and tourism sectors</u>, <del>including loss of highly valued soils or creating competing urban demand for water and other resources;</del> and</p> <p>ii. <u>Can be developed without resulting in significant adverse effects on any matter of national importance or national significance. Maintain or enhance significant biodiversity, landscape or natural character values; and</u>  <u>iii. Maintain important cultural or heritage values; and</u>  <del>iv. iii.</del> <u>Avoid land with significant risk from natural hazards which cannot be remedied or mitigated;</u> and</p> <p>d) Considering the need for urban growth boundaries to control <u>potentially inappropriate</u> urban expansion; and</p> <p>e) Ensuring efficient use of land; and</p> <p>f) Requiring the use of low or no-emission heating systems in buildings, <del>when</del> <u>where</u> ambient air quality <del>in or near the growth area</del> is:</p> <p>i. Below standards for human health; or</p> <p>ii. Vulnerable to degradation given the local climatic and geographical context; and</p> <p>g) Giving effect to the principles of good urban design, <del>as detailed in Schedule 6;</del> and</p> <p>h) Giving effect to the principles of crime prevention through environmental design</p>	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community.</li> <li>• Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS.</li> <li>• "Considering the need for urban growth boundaries" should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential methods.</li> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	Delete the policy.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</p> <ul style="list-style-type: none"> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<p>Amend as follows: "Manage subdivision, use and development of rural land, to:</p> <p>a) Avoid <u>inappropriate</u> development or fragmentation of land <u>, particularly</u> which undermines or forecloses the potential of rural land:</p> <p>i. For primary production <u>or tourism</u>; or</p> <p>...</p> <p>b) Have particular regard to whether the proposal will result in a loss of the productive potential of <u>regionally significant</u> <del>highly versatile</del> soils, unless:</p> <p>i. The land adjoins an existing urban area and there is no other land suitable for urban expansion <u>, or there is a shortage of land available for urban development</u>; and</p> <p>ii. <del>There highly versatile soils are needed for urban expansion,</del> any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and</p> <p>iii. reverse sensitivity effects on rural productive activities can be <u>satisfactorily</u> avoided; and</p> <p>c) Avoid unplanned demand for provision of</p>	<ul style="list-style-type: none"> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<u>public infrastructure investment</u> , including domestic water supply and waste disposal; and d) Avoid creating <u>significant competing demand for water</u> <del>or other resources</del> ."	
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk</u> <del>harm</del> human health or the quality of the environment <del>in Otago</del> ".	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend c) as follows: "c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and".	No reason given.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Amend a) as follows: "a) Prior to subdivision or development of potentially contaminated land, <u>requiring- ensuring</u> a site investigation is undertaken to determine the nature or extent of any contamination; and"	No reason given.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Amend as follows: "Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably degrade natural values</u> ".	<ul style="list-style-type: none"> <li>• Avoiding the creation of new contaminated land may not always be appropriate or practical: in remediating contaminated land it may be appropriate to move soil to another location depending on where it is situated and how that land is to be used.</li> <li>• The emphasis should be on avoiding risks to human health or the environment.</li> </ul>
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	<ul style="list-style-type: none"> <li>• Add the following objective: "Significant industry activities and physical resources are provided for".</li> <li>• Add the following policy: "Recognising and providing for significant industry activities and physical resources Recognising and providing for significant industry activities and physical resources, by: a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety; b) Protecting significant industry activities from inappropriate subdivision, use, and development; c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated."</li> <li>• Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to: a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and</li> </ul>	Regionally Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				cultural well-being; b) Protect significant industry activities from inappropriate subdivision, use, and development; c) Enable significant industry activities and development that does not have a significant adverse effect on the environment; d) Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance."	
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Amend	Amend as follows: " <del>Sometimes, existing businesses may be placed at risk by pressure to change activities are susceptible to reverse sensitivity effects, particularly when land use changes to activities that may compete or conflict, creating reverse sensitivities.</del> "	No reason given.
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows: "Many natural and physical resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users."	No reason given.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend as follows: "Maintain and, <del>where possible,</del> enhance public access to the natural environment, including to the coast, lakes, rivers and their margins, and areas of cultural or historic significance, unless restricting access is necessary to: ... b) Protect the <del>natural heritage and ecosystem</del> values of sensitive natural areas or habitats; or..."	No reason given.
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: " <del>Significant h</del> Historic heritage resources are recognised and contribute to the region's character and sense of identity".	No reason given.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: " <del>Manage historic heritage values to p</del> Protect <del>and enhance</del> the values of places and areas of historic heritage <del>from inappropriate development</del> , by: ... c) Avoiding <del>, remedying or mitigating</del> adverse effects on those values which contribute to the area or place being of regional or national significance; and <del>d) Avoiding significant adverse effects on other values of areas and places of historic heritage; and</del> e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and f) Remediating, when adverse effects on other values cannot be avoided; and g) Mitigating when adverse effects on other values cannot be avoided or remediated; and h) ..."	<ul style="list-style-type: none"> <li>• The PRPS does not correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows: <del>"Managing for rural- Protecting regionally significant industry activities from inappropriate subdivision, use and development</del> Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling <u>regionally significant industry activities</u> , <del>farming and other rural activities that support the rural economy</del> ; and b) Minimising the loss of <u>regionally significant soils highly valued for their versatility for primary production</u> ; and c) Restricting the establishment of activities <del>in rural areas</del> that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u> ; and d) <del>Minimising- Restricting</del> the subdivision of productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and e) Providing for other activities that have a functional need to locate in rural areas <del>including tourism and recreational activities that are of a nature and scale compatible with rural activities</del> ."	<ul style="list-style-type: none"> <li>• Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.</li> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> </ul>
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Amend	Amend as follows: <del>"Recognising and providing for the values of Otago's central business districts</del> Recognise <u>and provide for</u> the values of Otago's central business districts, including as the primary focal point for social, cultural and economic activities within a community."	No reason given.
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	Amend as follows: "Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of <del>the Otago's</del> central business districts and support local commercial needs, by: a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and ... c) Avoiding unplanned extension of commercial activities that has significant adverse effects on <del>the a</del> central business district, including on the efficient use of infrastructure, employment and services; and ..."	No reason given.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	Amend as follows: "Manage the finite nature of land suitable and available for industrial activities, by: a) Providing specific areas to accommodate <del>the effects of</del> industrial activities; and b) Providing a range of land suitable for different industrial activities <del>including land extensive activities</del> ; and c) Restricting the establishment of activities in	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				industrial areas that may result in: i. Reverse sensitivity effects <u>on industrial activities</u> ; or ii. Inefficient use of industrial land or infrastructure."	
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend as follows: "Managing locational needs for mineral and gas exploration, extraction and processing Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Giving preference to avoiding their location in</del> <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> : i. ... b) Restricting the establishment of <del>these</del> activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities</u> ."	No reason given.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in</del> : ... e) <u>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and,</u> ... g) Considering the use of offsetting, or compensatory measures, <u>to address</u> <del>for</del> residual adverse effects <u>on the environment</u> ; and ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values <del>only</del> when: a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and b) Those <u>adverse</u> effects cannot be avoided, remedied or mitigated; and c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."	<ul style="list-style-type: none"> <li>• The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection.</li> <li>• Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Amend as follows: " <u>Providing for</u> <del>o</del> Offsetting <del>for</del> <u>from adverse effects on</u> indigenous biodiversity Provide for offsetting <del>for</del> <u>from adverse effects on indigenous biodiversity, when</u> <del>it is enabled,</del>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				by ensuring that: a) The offset achieves no net loss <del>and preferably a net gain</del> in indigenous biodiversity values; and b) The offset is undertaken close to the location of development <del>, where this will result in the best ecological outcome; and...</del>	
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	Add the following method: "1.1.4 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."	No reason given.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<ul style="list-style-type: none"> <li>Amend Method 1.2.1 as follows: "Identify <del>and protect from inappropriate subdivision, use and development,</del> places, areas or landscapes of cultural, spiritual or traditional significance to them;"</li> <li>Amend Method 1.2.2 as follows: "Identify, and protect <del>from inappropriate subdivision, use and development,</del> the values that contribute to their significance;"</li> <li>Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</li> </ul>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Oppose	Delete Method 1.4.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Oppose	Delete Method 2.2	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Oppose	Delete Method 2.3.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting <del>from inappropriate subdivision, use and development,</del> historic heritage places <del>or</del> areas <del>or</del> landscapes located in the beds of rivers, lakes and wetlands or the coastal marine area;"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.12.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7.	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>Unnecessary or ambiguous ("may").</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend Method 4.2.1 as follows: "City or district councils will implement Policies 3.2.2 and 3.2.3 <u>to the extent applicable</u> when undertaking natural hazard assessments".	No reason given.
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend Method 6.1.2 as follows: "Regional, city and district councils, in their areas of responsibility, will identify: ... d) <del>Special amenity landscapes;</del> ... g) <u>Regionally significant soil resources;</u> h) <u>Significant infrastructure.</u> "	<ul style="list-style-type: none"> <li>Concerned about introducing the term of Special Amenity Landscapes.</li> <li>Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> <li>Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. Too high a level of protection could have adverse effects on the economic and social wellbeing of communities.</li> <li>Significant infrastructure should be defined, recognised and provided for.</li> </ul>
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Oppose	Delete Method 7.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
211	Method 8 - Education and Information	Method 8.1.1 - Information from regional, district and city councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
214	Method 8 - Education and Information	Method 8.1.4 - Information from city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
215	Method 9 - Funding	Method 9 - Funding	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
220	Method 11 - Advocacy and Facilitation	Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional	Oppose	Delete Methods.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Amend d) as follows: "d) Facilitate coordination between <del>lifeline utilities</del> <u>significant infrastructure and significant community facilities used</u> for emergency management, including by: i) Recognising the interconnections between <u>significant infrastructure</u> <del>lifeline utilities</del> ..."	No reason given.
225	Method 11 - Advocacy and	Method 11.2.3 - Facilitation by	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> </ul>

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	Facilitation	regional, city and district councils - optional			<ul style="list-style-type: none"> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
248	Appendices	Appendices - general	Oppose	<ul style="list-style-type: none"> <li>Delete Appendix 1.</li> <li>Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS.</li> </ul>	<ul style="list-style-type: none"> <li>Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and</li> <li>Is not required by RMA S62 or is not an active directive.</li> </ul>
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>Add the following definitions: <ul style="list-style-type: none"> <li>Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance;</li> <li>Significant Community Facility - include facilities that provide essential community services; <ul style="list-style-type: none"> <li>Urban;</li> <li>Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS;</li> <li>Regionally Significant Industry Activity - include any activity associated with tourism or primary production;</li> <li>Hard mitigation measures;</li> </ul> </li> <li>Amend definition of Kai Tahu to clarify if has the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning documents outside Otago.</li> </ul> </li> </ul>	To reduce ambiguity and enable more efficient implementation of the PRPS.
250	Glossaries	Glossary of Te Reo terms	Oppose	Delete and include these terms in the Glossary.	Unnecessary to have 2 separate glossaries.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	<ul style="list-style-type: none"> <li>Delete or amend text that: <ul style="list-style-type: none"> <li>Is duplicated;</li> <li>Is vague or ambiguous;</li> <li>Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation;</li> <li>Is not required by RMA S62 or is not an active directive; and</li> <li>Delete all "need" statements.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>"Need" statements are not required by RMA S62 or is not an active directive.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	<ul style="list-style-type: none"> <li>Any consequential or other amendments required to give effect, or like effect, to any matter raised in the submission.</li> </ul>	No reason given.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	<ul style="list-style-type: none"> <li>Retention of all provisions as notified, except as requested in the submission.</li> </ul>	No reason given.
6	Overall approach	Schedule 3 - Significance threshold	Oppose	<ul style="list-style-type: none"> <li>Delete; or</li> <li>Amend so it is consistent with case law and insert new criteria to reflect the need to consider offsetting or compensation and to reflect environmental/planning context on a case-by-case basis, e.g.: <ul style="list-style-type: none"> <li>"11. Ability for offsetting or compensation: The extent to which the adverse effect can be</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>The S32 report does not evaluate Schedule 3.</li> <li>Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant.</li> <li>Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>directly offset or otherwise compensated, and consequently reducing the significance of the effect.</p> <ul style="list-style-type: none"> <li>• 12. Environmental Context: The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</li> <li>• 13. Matters of national importance and national significance: The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA. The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS." </li></ul>	
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Amend	Amend as follows: "The principles of Te Tiriti o Waitangi are <u>identified and</u> taken into account in resource management decisions".	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	<p>Amend as follows: "Policy 1.1.2 <u>Identifying and</u> <del>Faking</del> the principles of Te Tiriti o Waitangi into account</p> <p>Ensure that local authorities <del>exercise their functions and powers, to</del> <u>take into account the principles of Te Tiriti o Waitangi identified in Appendix 1A by:</u></p> <ul style="list-style-type: none"> <li>a) <u>Providing</u> <del>Accord</del> Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,</li> <li>b) <del>Involve</del> <u>Involving</u> Kai Tahu in resource management decision-making processes and implementation; and</li> <li>c) <del>Take</del> <u>Taking</u> into account Kai Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taoka ; and</li> <li>d) <del>Ensure</del> <u>Ensuring</u> Kai Tahu have the prerogative to: <ul style="list-style-type: none"> <li>i. <del>Identify</del> <u>Identifying</u> their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and</li> <li>ii. <del>Determine</del> <u>Determining</u> how best to express that relationship; and</li> </ul> </li> <li>e) <del>Ensure</del> <u>Ensuring</u> Kai Tahu are able to exercise kaitiakitaka; and</li> <li>f) <del>Ensure</del> <u>Ensuring</u> that district and regional plans: <ul style="list-style-type: none"> <li>i. <del>Give</del> <u>Giving</u> effect to the Ngai Tahu Claims Settlement Act 1998; and</li> <li>ii. <del>Recognise</del> <u>Recognising</u> and <del>provide</del> <u>providing</u> for statutory acknowledgement areas, as detailed in Schedule 2; and</li> <li>iii. <del>Provide</del> <u>Providing</u> for other areas in</li> </ul> </li> </ul>	Use wording of RMA Part 2.

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				Otago that are recognised as significant to Kai Tahu in a manner similar to that prescribed for statutory acknowledgement areas."	
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Objective 1.2 Kai Tahu values, rights and interests and customary resources are <u>identified and sustained</u> ."	No reason given.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) Ensuring <u>sustainable management of</u> resources supports <del>their</del> customary uses and cultural values (as detailed in Schedules 1A and B); and"	No reason given.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> on those values and sites <del>as detailed in Schedule 3</del> ; and"	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<ul style="list-style-type: none"> <li>• Amend b) as follows: "b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and"</li> <li>• Delete c).</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Specify or identify "other cultural values" referred to in other parts of the RPS in Schedule 1A.	No reason given.
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	Amend Issue as follows: "Degradation of <u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time <del>will</del> <u>can</u> cause serious damage."	Regional issues include natural resource management issues.
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected <u>from inappropriate subdivision, use and development</u> ."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <del>Natural</del> <u>Environmental</u> systems <u>and resources</u> are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely affects the <u>environmental</u> value of another..."	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural <del>and physical</del> resources are recognised, <u>and protected from inappropriate subdivision, use and development</u> <del>maintained and enhanced</del> ."	<ul style="list-style-type: none"> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage	• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>freshwater, to:</p> <p>...</p> <p>c) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u>; and</p> <p>d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u>, unless detrimental to indigenous biodiversity; and</p> <p>...</p> <p>j) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u>; and</p> <p>k) Provide for other cultural values <u>as identified in Schedule 1A</u>; and</p> <p>l) Protect important recreation values <u>from inappropriate subdivision, use and development</u>; and</p> <p>..."</p>	<p>and development.</p> <ul style="list-style-type: none"> <li>• The PRPS should be focused on resource management issues of regional significance.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	<p>Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to:</p> <p>...</p> <p>b) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u>; and</p> <p>...</p> <p>g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u>; and</p> <p>h) Provide for other cultural values <u>as identified in Schedule 1A</u>; and..."</p>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	<p>Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to:</p> <p>...</p> <p>c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u>, unless detrimental to indigenous biodiversity; and</p> <p>...</p> <p>g) Provide for other cultural values <u>as identified in Schedule 1A</u>; and</p> <p>h) Protect important recreation values <u>from inappropriate subdivision, use and development</u>; and</p> <p>..."</p>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend b) as follows: "b)Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	<p>Amend as follows: "Recognise soil values <u>that are of a regional significance</u>, and manage <u>those</u> soils, to:</p> <p>...</p> <p>f) <del>Retain</del> <u>Ensure the primary use of regionally significant soil resources <u>is</u> for primary production <u>purposes</u></u>; and</p> <p>g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u>; and</p>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and ... k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u> ; and ..."	
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Amend c) iii. as follows: "iii. Historical <del>and heritage</del> associations".	No reason given.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• As applies to all landscape assessments, including for "Special Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Add the following new policy: " <u>Managing cross boundary landscape effects</u> <u>Promote alignment of District Plans and integrated assessments of environmental effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries.</u> "	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries, which would benefit from a regionally integrated approach.</li> <li>• This proposed policy would be as effective as the provisions on Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: " <del>Protect and enhance</del> <u>Manage subdivision, use and development that affects</u> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects <del>on these values which contribute</del> <u>which will result in</u> to the area or habitat <u>losing its</u> <del>being</del> significant <u>status</u> ; and b) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on other values of the area or habitat; and <del>c) Assessing the significance of adverse effects on these values, as detailed in Schedule 3; and</del> ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes <del>, using the attributes as detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• These attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• Schedule 4 should be deleted</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: " <del>Protect, enhance and restore</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding natural features, landscapes and	<ul style="list-style-type: none"> <li>• Could disrupt the balance of the values of outstanding natural landscapes and features and other important values.</li> <li>• For example, ski fields are appropriate to locate in alpine environments that may be considered outstanding natural landscapes.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>seascapes, by:</p> <p>a) <del>Avoiding adverse effects on those values which contribute to which will result in the loss of the</del> significance of the natural feature, landscape or seascape; and</p> <p>...</p> <p><del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del></p> <p>...</p> <p><u>g) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values</u></p> <p><u>(h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate".</u></p>	<ul style="list-style-type: none"> <li>• Ensuring such businesses can continue to operate and provide an important recreational and economic resource to Otago should be borne in mind.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding, using the attributes detailed in Schedule 4."	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of different criteria being used in current or proposed district plans, and hence, creating inefficiencies and potentially slowing down forthcoming district plan reviews. These concerns also relation to Schedule 4.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social wellbeing of communities.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	<p>Amend as follows: "<del>Protect or enhance the values of: Manage</del> special amenity landscapes and highly valued natural features, by:</p> <p>a) <del>Avoiding, remedying or mitigating significant</del> adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and</p> <p><del>b) Avoiding, remedying or mitigating other adverse effects on other values; and</del></p> <p><del>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del></p> <p>...</p> <p><u>g) Recognising and providing for the use of such resources including as places where productive activities, tourism, recreation, infrastructure, homes and work places are located.</u></p> <p><u>h) Allowing values to adapt over time as communities and economies change."</u></p>	<ul style="list-style-type: none"> <li>• Level of protection not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it.</li> <li>• Better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category.</li> <li>• The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend as follows: "Preserve or enhance the natural character values of the coastal environment, by: <p>a) <u>Avoiding adverse effects of activities on natural character in areas of the coastal</u></p>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

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				<p><del>environment with</del> <del>on those values which contribute to the</del> outstanding natural character of an area; and</p> <p>b) Avoiding significant adverse effects <u>and avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment</u> <del>on those values which contribute to the high natural character values of an area; and</del></p> <p>c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del></p> <p>d) <del>Avoiding, remedying or mitigating other adverse effects on other values; and...</del>"</p>	
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	<p>Amend as follows: "<del>Protect</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding water bodies and wetlands by:</p> <p>a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> , including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and</p> <p>...</p> <p><del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> ..."</p>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	<p>Amend as follows:</p> <p>"Policy 2.2.14 Identifying <del>highly valued regionally significant</del> soil resources</p> <p>Identify areas and values of <del>highly valued regionally significant</del> soil resources, using the following criteria:</p> <p>..."</p>	No reason given.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	<p>Amend as follows:</p> <p>"Policy 2.2.15 Managing <del>highly valued regionally significant</del> soil resources</p> <p>Protect the values of <del>areas of highly valued regionally significant</del> soil resources, by:</p> <p>a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on those values which contribute to the soil being <del>highly valued</del> <u>regionally significant</u>; and</p> <p>...</p> <p><del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del></p> <p>d) Recognising that <u>loss of regionally significant soils to urban expansion development</u> may be appropriate <u>near</u> <del>due to location and proximity to</del> existing urban development <del>and infrastructure</del> <u>particularly when there is a lack of supply of land available for urban development</u>."</p>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	<p>Amend as follows: "<del>Natural resource s</del>Systems and their interdependencies are recognised"</p>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Add the following policy: " <u>Applying an integrated management approach for significant infrastructure and activities that affect significant infrastructure</u> <u>Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure, by:</u> a) <u>Promoting consistent corridor management throughout the region.</u> "	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>Amend a) as follows: "a) Taking into account the impacts of management of one resource on the <u>environmental</u> values of another, or on the environment in general; and"</li> <li>Add the following clauses: "<u>c) Ensuring that resource objectives are complementary across administrative boundaries; and</u> <u>d) Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete policy.	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
66	Objectives on resilience, health and safety	Issue 3.1 - Risk of overreaching the environment's carrying capacity	Amend	Amend as follows: " <u>Activities that utilise resources -are undertaken-</u> without regard to their <u>local- environmental values -are at greater risk inappropriately compromising -of overreaching that- the</u> environment's ability to sustain the activity."	No reason given.
70	Objectives on resilience, health and safety	Issue 3.5 - Importance of infrastructure of regional or national significance	Amend	Amend as follows: " <u>It is important to recognise and provide for Significant Infrastructure -of regional and national significance- even though it may result in -local- adverse environmental effects -impacts, or adversely affect other nationally important values-...</u> "	Significant infrastructure should be defined, recognised and provided for.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Protection, <u>subdivision,</u> use and development of <u>-natural and physical-</u> resources recognises environmental constraints".	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising <u>-natural and physical-</u> environmental constraints Recognise the <u>-natural and physical-</u> environmental constraints of <u>resources -an area-, the environmental</u> effects of those constraints on activities <u>utilising those resources,</u> and the <u>environmental</u> effects of those activities on those constraints, <u>-including with particular recognition of :</u> ... c) The sensitivity of <u>the natural and physical</u> resources to adverse effects from the proposed	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				activity/land use; and ..."	
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Amend Objective 3.2 as follows: " <del>Inappropriate</del> risk that natural hazards pose to Otago's communities are minimised"	Designing to a 100 year level may be appropriate, but it would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities <del>including hazards of low likelihood and high consequence.</del> "	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows: "Manage natural hazard risk, <del>including</del> with <u>particular</u> regard to: a) The risk <del>they</del> posed, considering the likelihood and consequences of natural hazard events; and ..."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend 1st sentence as follows: "Assess activities <u>in areas known to be subject to an identified</u> , <del>for</del> natural hazard risk, by considering:..."	No reason given.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Policy 3.2.6 Avoiding increased natural hazard risk <u>from inappropriate subdivision, use and development</u> Avoid <u>remedy or mitigate increased increasing</u> natural hazard risk <u>from inappropriate subdivision, use and development</u> , including by:..."	<ul style="list-style-type: none"> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• It would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).</li> </ul>
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend 1st sentence as follows: "Reduce existing natural hazard risk, <del>including particularly</del> by:"	No reason given.
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) There is significant <del>public or environmental</del> benefit in doing so; or b) The work relates to the functioning ability of <u>significant infrastructure</u> , a <u>lifeline utility</u> , or facility <u>used</u> for essential or emergency services <u>or a significant community facility</u> ."	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ... b) Designing infrastructure to take into account: ... iv. <del>Natural and physical</del> Resource constraints; and v. Effects on the values of natural and physical resources; and ... c) Managing urban growth <u>in a coordinated manner to ensure</u> : i. <del>Within areas that have</del> sufficient infrastructure <u>services are provided</u> <del>capacity</del> ; or ii. <del>Where infrastructure services can be</del>	<ul style="list-style-type: none"> <li>• Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community costs than benefits in high growth areas.</li> <li>• Regulation of the release of land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				upgraded or extended efficiently and effectively ; and d) Co-ordinating the design and development of infrastructure with the staging of land use change, including with: i. Structural design and release of land for new urban development; or ii. Structural redesign and redevelopment within existing urban areas."	
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend as follows: "Manage infrastructure activities, to: ... b) <del>Reduce, Avoid, remedy or mitigate</del> adverse effects of those activities, including cumulative adverse effects on <del>natural and physical</del> resources; and c) Support economic, social and community <del>needs</del> activities; and d) Improve efficiency of use of <del>natural</del> resources; and e) Protect infrastructure corridors <u>from inappropriate subdivision, uses and development</u> <del>for infrastructure needs, now and for the future</del> ; and ... g) Protect the functioning of <u>significant infrastructure, lifeline utilities</u> and essential or emergency services."	Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend as follows: "Policy 3.4.3 Designing <del>lifeline utilities</del> <u>significant infrastructure</u> and facilities for essential or emergency services Design <del>lifeline utilities</del> <u>significant infrastructure</u> , and facilities for essential or emergency services, to:..."	No reason given.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, <del>lifeline utilities</del>, <u>significant infrastructure</u>, and essential and emergency services".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend as follows: " <u>Significant</u> Infrastructure <del>of national and regional significance</del> is <u>recognised and provided for</u> managed in a sustainable way."	Significant infrastructure should be defined, recognised and provided for.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend as follows: "Policy 3.5.1 <u>Recognising and providing for</u> national and regional significance of infrastructure Recognise <u>and provide for</u> the <del>national and regional</del> significance of the following infrastructure: a) Renewable electricity generation facilities <del>where they supply the national electricity grid and local distribution network</del> ; and ... f) Structures for transportation by rail <u>and</u>	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The PRPS does not give enough recognition of and provision for the tourism sector.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	<p>Amend as follows:</p> <p>"Policy 3.5.2 Managing adverse effects of <u>significant</u> infrastructure <del>that has national or regional significance</del></p> <p><del>Minimise</del> <u>Avoid, remedy or mitigate</u> adverse effects from <u>significant</u> infrastructure <del>that has national or regional significance</del>, by:</p> <p>a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in:</del></p> <p>...</p> <p>b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding</del> <u>minimising</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and</p> <p>...</p> <p><del>d) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del></p> <p>e) <del>Considering</del> <u>Enabling infrastructure providers to employ</u> the use of offsetting ; or other compensatory measures <u>to address</u> <del>for</del> residual adverse effects on <u>the environment indigenous biodiversity</u>."</p>	<ul style="list-style-type: none"> <li>• Significant infrastructure should be defined, recognised and provided for.</li> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<ul style="list-style-type: none"> <li>• Amend header as follows: "Protecting <u>significant</u> infrastructure <del>of national or regional significance</del>."</li> <li>• Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>• Significant infrastructure should be defined, recognised and provided for.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	<p>Amend as follows:</p> <p>"Policy 3.6.2 Promoting small <u>and community</u> scale renewable electricity generation</p> <p>Promote small <u>and community</u> scale renewable electricity generation activities that :</p> <p>a) <del>Increase the local community's resilience and security of energy supply; and</del></p> <p>b) <del>Avoid, remedy or mitigate adverse effects from that activity</del>."</p>	No reason given.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	<ul style="list-style-type: none"> <li>• Amend 1st sentence as follows: "Protect the generation capacity of <u>nationally or regionally significant</u> renewable electricity generation activities, by..."</li> <li>• Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	<p>Amend as follows:</p> <ul style="list-style-type: none"> <li>• Delete d).</li> <li>• "e) Protecting <del>existing</del> distribution corridors for infrastructure needs, now and for the future."</li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	<p>Amend as follows: "Encourage the use of good urban design principles in subdivision and development in urban areas <del>, as detailed in Schedule 6</del>, to:</p>	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> </ul>



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				<p>...</p> <p>b) Ensure that the built form relates well to its <u>surrounding</u> <del>natural</del> environment, including by:</p> <p>i. <del>Reflecting natural features such as rivers, lakes, wetlands and topography;</del> and</p> <p>ii. <del>Providing for ecological corridors in urban areas;</del> and</p> <p>iii. <del>Protecting areas of indigenous biodiversity and habitat for indigenous fauna;</del> and</p> <p>iv. <del>Encouraging use of low impact design techniques;</del> and</p> <p>v. <del>Encouraging construction of warmer buildings</del> ; and</p> <p>..."</p>	<ul style="list-style-type: none"> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend a) as follows: "a) <del>Maximising</del> Optimising passive solar gain; and"	No reason given.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend as follows: "Design <u>and maintain</u> public spaces, including streets and open spaces, to <u>provide for a range of uses and</u> meeting the reasonable access and mobility needs of all sectors within the community, <del>including the young and those with mobility impairments.</del> "	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	<p>Amend as follows:</p> <p>"Policy 3.8.1 <del>Managing</del> <u>Providing</u> for urban growth</p> <p><del>Manage</del> <u>Provide for</u> urban growth and creation of new urban land in a strategic and co-ordinated way, by:</p> <p>a) <u>Understanding demand and supply of</u> <del>Ensuring there is sufficient</del> residential, commercial and industrial <u>zoned</u> land capacity, <del>to</del> <u>and catering</u> for <u>that</u> demand <del>for such land, projected over at least the next 10 years;</del> and</p> <p>b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to:</p> <p>i. Provide infrastructure in an efficient and effective way; and</p> <p>ii. <del>Avoid</del> <u>Discouraging</u> additional costs <u>on the public</u> that arise from unplanned infrastructure expansion; and</p> <p>c) Identifying future growth areas that:</p> <p>i. Minimise <u>significant</u> adverse effects on <del>rural the</del> <u>productivity of the rural and tourism</u> sectors, <del>including loss of highly valued soils or creating competing urban demand for water and other resources;</del> and</p> <p>ii. <u>Can be developed without resulting in significant adverse effects on any matter of</u></p>	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community.</li> <li>• Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS.</li> <li>• "Considering the need for urban growth boundaries" should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential methods.</li> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><del>national importance or national significance</del>  <del>Maintain or enhance significant biodiversity,</del>  <del>landscape or natural character values; and</del>  <del>iii. Maintain important cultural or heritage values; and</del>  <del>iv- iii. Avoid land with significant risk from natural hazards which cannot be remedied or mitigated; and</del>  d) Considering the need for urban growth boundaries to control <del>potentially inappropriate</del> urban expansion; and  e) Ensuring efficient use of land; and  f) Requiring the use of low or no-emission heating systems in buildings, <del>when</del> <u>where</u> ambient air quality <del>in or near the growth area</del> is:  i. Below standards for human health; or  ii. Vulnerable to degradation given the local climatic and geographical context; and  g) Giving effect to the principles of good urban design <del>as detailed in Schedule 6;</del> and  h) Giving effect to the principles of crime prevention through environmental design</p>	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	Delete the policy.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS:</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<p>Amend as follows: "Manage subdivision, use and development of rural land, to:</p> <p>a) Avoid <u>inappropriate</u> development or fragmentation of land <u>particularly</u> which undermines or forecloses the potential of rural land:</p> <p>i. For primary production <u>or tourism</u>; or</p> <p>...</p> <p>b) Have particular regard to whether the proposal will result in a loss of the productive potential of <u>regionally significant</u> <del>highly versatile</del> soils, unless:</p> <p>i. The land adjoins an existing urban area and there is no other land suitable for urban expansion <u>, or there is a shortage of land available for urban development</u>; and</p> <p>ii. <del>There highly versatile soils are needed for urban expansion</del> any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and</p> <p>iii. reverse sensitivity effects on rural productive activities can be <u>satisfactorily</u> avoided; and</p> <p>c) Avoid unplanned demand for provision of <u>public infrastructure investment</u>, including domestic water supply and waste disposal; and</p> <p>d) Avoid creating <u>significant</u> competing demand for water <del>or other</del> resources."</p>	<ul style="list-style-type: none"> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk</u> <del>harm</del> human health or the quality of the environment <del>in Otago</del> ".	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend c) as follows: "c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and".	No reason given.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Amend a) as follows: "a) Prior to subdivision or development of potentially contaminated land, <u>requiring</u> <del>ensuring</del> a site investigation is undertaken to determine the nature or extent of any contamination; and"	No reason given.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Amend as follows: "Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably degrade natural values</u> ".	<ul style="list-style-type: none"> <li>• Avoiding the creation of new contaminated land may not always be appropriate or practical: in remediating contaminated land it may be appropriate to move soil to another location depending on where it is situated and how that land is to be used.</li> <li>• The emphasis should be on avoiding risks to human health or the environment.</li> </ul>
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	<ul style="list-style-type: none"> <li>• Add the following objective: "Significant industry activities and physical resources are provided for".</li> </ul>	Regionally Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Add the following policy: "Recognising and providing for significant industry activities and physical resources Recognising and providing for significant industry activities and physical resources, by: a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety; b) Protecting significant industry activities from inappropriate subdivision, use, and development; c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated."</li> <li>• Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to: a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and cultural well-being; b) Protect significant industry activities from inappropriate subdivision, use, and development; c) Enable significant industry activities and development that does not have a significant adverse effect on the environment; d) Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance."</li> </ul>	
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Amend	Amend as follows: " <del>Sometimes, e</del> Existing businesses may be placed at risk by pressure to change - activities are susceptible to reverse sensitivity effects, particularly when land use changes - to activities that may compete or conflict, creating reverse sensitivities."	No reason given.
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows: "Many <del>natural and physical</del> resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users."	No reason given.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend as follows: "Maintain and <del>where possible,</del> enhance public access to the natural environment, including to the coast, lakes, rivers and their margins, and areas of cultural or historic significance, unless restricting access is necessary to:	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				... b) Protect the <del>natural heritage and ecosystem</del> values of sensitive natural areas or habitats; or..."	
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: " <u>Significant h</u> Historic heritage resources are recognised and contribute to the region's character and sense of identity".	No reason given.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: " <u>Manage historic heritage values to p</u> Protect <del>and enhance</del> the values of places and areas of historic heritage <u>from inappropriate development</u> , by: ... c) Avoiding <u>, remedying or mitigating</u> adverse effects on those values which contribute to the area or place being of regional or national significance; and <del>d) Avoiding significant adverse effects on other values of areas and places of historic heritage; and</del> e) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> f) <del>Remediating, when adverse effects on other values cannot be avoided; and</del> g) <del>Mitigating when adverse effects on other values cannot be avoided or remediated; and</del> h) ..."	<ul style="list-style-type: none"> <li>• The PRPS does not correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows: " <del>Managing for rural</del> <u>Protecting regionally significant industry activities from inappropriate subdivision, use and development</u> Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling <u>regionally significant industry activities</u> , <del>farming and other rural activities that support the rural economy</del> ; and b) Minimising the loss of <u>regionally significant soils</u> <del>highly valued for their versatility for primary production</del> ; and c) Restricting the establishment of activities <del>in rural areas</del> that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u> ; and d) <del>Minimising</del> <u>Restricting</u> the subdivision of productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and e) Providing for other activities that have a functional need to locate in rural areas <del>including tourism and recreational activities that are of a nature and scale compatible with rural activities.</del> "	<ul style="list-style-type: none"> <li>• Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.</li> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> </ul>
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Amend	Amend as follows: "Recognising <u>and providing for</u> the values of Otago's central business districts Recognise <u>and provide for</u> the values of	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Otago's central business districts, including as the primary focal point for social, cultural and economic activities within a community."	
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	Amend as follows: "Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of <del>the</del> <u>Otago's</u> central business districts and support local commercial needs, by: a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and ... c) Avoiding unplanned extension of commercial activities that has significant adverse effects on <del>the</del> <u>a</u> central business district, including on the efficient use of infrastructure, employment and services; and ..."	No reason given.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	Amend as follows: "Manage the finite nature of land suitable and available for industrial activities, by: a) Providing specific areas to accommodate <del>the effects of</del> industrial activities; and b) Providing a range of land suitable for different industrial activities <del>, including land extensive activities</del> ; and c) Restricting the establishment of activities in industrial areas that may result in: i. Reverse sensitivity effects <u>on industrial activities</u> ; or ii. Inefficient use of industrial land or infrastructure."	No reason given.
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend as follows: "Managing locational needs for mineral and gas exploration, extraction and processing Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Giving preference to avoiding their location in</del> <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> : i. ... b) Restricting the establishment of <del>these</del> activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities</u> ."	No reason given.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in</u>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

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				<p>significant adverse effect on <del>Giving preference to avoiding their location in:</del></p> <p>...</p> <p>e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and,</p> <p>...</p> <p>g) Considering the use of offsetting, or compensatory measures, <del>to address</del> <u>for</u> residual adverse effects <u>on the environment</u>; and</p> <p>..."</p>	
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	<p>Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values <del>only</del> when:</p> <p>a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and</p> <p>b) Those <u>adverse</u> effects cannot be avoided, remedied or mitigated; and</p> <p>c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."</p>	<ul style="list-style-type: none"> <li>The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection.</li> <li>Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	<p>Amend as follows:</p> <p><del>"Providing for o</del>Offsetting <del>for</del> <u>from adverse effects on</u> indigenous biodiversity</p> <p>Provide for offsetting <del>for</del> <u>from adverse effects</u> on indigenous biodiversity, when <del>it is enabled,</del> <u>by ensuring that:</u></p> <p>a) The offset achieves no net loss <del>and preferably a net gain</del> in indigenous biodiversity values; and</p> <p>b) The offset is undertaken close to the location of development <del>, where this will result in the best ecological outcome; and...</del>"</p>	No reason given.
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	<p>Add the following method: "1.1.4 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</p>	No reason given.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<ul style="list-style-type: none"> <li>Amend Method 1.2.1 as follows: "Identify <del>and protect</del> <u>from inappropriate subdivision, use and development</u>, places, areas or landscapes of cultural, spiritual or traditional significance to them;"</li> <li>Amend Method 1.2.2 as follows: "Identify, and protect <del>from inappropriate subdivision, use and development</del>, the values that contribute to their significance;"</li> <li>Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</li> </ul>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Oppose	Delete Method 1.4.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
186	Method 2 - Regional, City and	Method 2.2 - Establishing	Oppose	Delete Method 2.2	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> </ul>

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	District Council Relationships	processes to address cross-boundary issues			<ul style="list-style-type: none"> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Oppose	Delete Method 2.3.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting <u>from inappropriate subdivision, use and development</u> , historic heritage places <u>or</u> areas <u>or</u> landscapes located in the beds of rivers, lakes and wetlands or the coastal marine area;"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.12.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7.	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>Unnecessary or ambiguous ("may").</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend Method 4.2.1 as follows: "City or district councils will implement Policies 3.2.2 and 3.2.3 <u>to the extent applicable</u> , when undertaking natural hazard assessments".	No reason given.
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend Method 6.1.2 as follows: "Regional, city and district councils, in their areas of responsibility, will identify: ... -d) Special amenity landscapes; ..."	<ul style="list-style-type: none"> <li>Concerned about introducing the term of Special Amenity Landscapes.</li> <li>Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> <li>Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. Too high a level of</li> </ul>



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				<u>g) Regionally significant soil resources;</u> <u>h) Significant infrastructure.</u> "	protection could have adverse effects on the economic and social wellbeing of communities. • Significant infrastructure should be defined, recognised and provided for.
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Oppose	Delete Method 7.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
211	Method 8 - Education and Information	Method 8.1.1 - Information from regional, district and city councils - optional	Oppose	Delete Method.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
214	Method 8 - Education and Information	Method 8.1.4 - Information from city and district councils - optional	Oppose	Delete Method.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
215	Method 9 - Funding	Method 9 - Funding	Oppose	Delete Method.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
220	Method 11 - Advocacy and Facilitation	Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional	Oppose	Delete Methods.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Amend d) as follows: "d) Facilitate coordination between <del>lifeline utilities - significant infrastructure and significant community facilities used</del> for emergency management, including by: i) Recognising the interconnections between significant infrastructure <del>lifeline utilities</del> ..."	No reason given.
225	Method 11 - Advocacy and Facilitation	Method 11.2.3 - Facilitation by regional, city and district councils - optional	Oppose	Delete Method.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
248	Appendices	Appendices - general	Oppose	• Delete Appendix 1. • Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS.	• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and • Is not required by RMA S62 or is not an active directive.
249	Glossaries	Glossary	Amend	• Add the following definitions: • Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance; • Significant Community Facility - include facilities that provide essential community services; • Urban; • Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS; • Regionally Significant Industry Activity - include any activity associated with tourism or primary production; • Hard mitigation measures; • Amend definition of Kai Tahu to clarify if has the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning documents outside Otago.	To reduce ambiguity and enable more efficient implementation of the PRPS.
250	Glossaries	Glossary of Te Reo terms	Oppose	Delete and include these terms in the Glossary.	Unnecessary to have 2 separate glossaries.

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256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Delete or amend text that: <ul style="list-style-type: none"> <li>• Is duplicated;</li> <li>• Is vague or ambiguous;</li> <li>• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation;</li> <li>• Is not required by RMA S62 or is not an active directive; and</li> <li>• Delete all "need" statements.</li> </ul>	<ul style="list-style-type: none"> <li>• Efficiency gains in removing unnecessary provisions.</li> <li>• Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>• "Need" statements are not required by RMA S62 or is not an active directive.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	<ul style="list-style-type: none"> <li>• Any consequential or other amendments required to give effect, or like effect, to any matter raised in the submission.</li> </ul>	No reason given.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Whole Regional Policy Statement (general support)	Amend	<ul style="list-style-type: none"> <li>• Retention of all provisions as notified, except as requested in the submission.</li> </ul>	No reason given.
6	Overall approach	Schedule 3 - Significance threshold	Oppose	<ul style="list-style-type: none"> <li>• Delete; or</li> <li>• Amend so it is consistent with case law and insert new criteria to reflect the need to consider offsetting or compensation and to reflect environmental/planning context on a case-by-case basis, e.g.: <ul style="list-style-type: none"> <li>" 11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly offset or otherwise compensated, and consequently reducing the significance of the effect.</li> <li>• 12. Environmental Context: The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</li> <li>• 13. Matters of national importance and national significance: The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA. The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS."</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• The S32 report does not evaluate Schedule 3.</li> <li>• Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant.</li> <li>• Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.</li> </ul>
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Amend	Amend as follows: "The principles of Te Tiriti o Waitangi are <u>identified and</u> taken into account in resource management decisions".	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	Amend as follows: "Policy 1.1.2 <u>Identifying and</u> taking the principles of Te Tiriti o Waitangi into account Ensure that local authorities <del>exercise their functions and powers, to</del> <u>take into account the principles of Te Tiriti o Waitangi identified in Appendix 1A by:</u> a) <u>Providing</u> Accord- Kai Tahu a status distinct from that of interest groups and members of the	Use wording of RMA Part 2.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				public, consistent with their position as a Treaty partner; and, b) <del>Involvement</del> <u>Involving</u> Kai Tahu in resource management decision-making processes and implementation; and c) <del>Take</del> <u>Taking</u> into account Kai Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taoka ; and d) <del>Ensure</del> <u>Ensuring</u> Kai Tahu have the prerogative to: i. <del>Identify</del> <u>Identifying</u> their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and ii. <del>Determine</del> <u>Determining</u> how best to express that relationship; and e) <del>Ensure</del> <u>Ensuring</u> Kai Tahu are able to exercise kaitiakitaka; and f) <del>Ensure</del> <u>Ensuring</u> that district and regional plans: i. <del>Give</del> <u>Giving</u> effect to the Ngai Tahu Claims Settlement Act 1998; and ii. <del>Recognise</del> <u>Recognising</u> and <del>provide</del> <u>providing</u> for statutory acknowledgement areas, as detailed in Schedule 2; and iii. <del>Provide</del> <u>Providing</u> for other areas in Otago that are recognised as significant to Kai Tahu in a manner similar to that prescribed for statutory acknowledgement areas."	
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Objective 1.2 Kai Tahu values, rights and interests and customary resources are <u>identified and</u> sustained."	No reason given.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) Ensuring <u>sustainable management of</u> resources supports <del>their</del> customary uses and cultural values (as detailed in Schedules 1A and B); and"	No reason given.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> , on those values and sites <del>, as detailed in Schedule 3</del> ; and"	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• <u>Schedule 3 criteria are inadequate (see submission on Schedule 3).</u></li> </ul>
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<ul style="list-style-type: none"> <li>• Amend b) as follows: "b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and"</li> <li>• Delete c).</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• <u>Schedule 3 criteria are inadequate (see submission on Schedule 3).</u></li> </ul>
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Specify or identify "other cultural values" referred to in other parts of the RPS in Schedule 1A.	No reason given.
25	Objectives on high quality natural	Issue 2.1 - Degradation of	Amend	Amend Issue as follows: "Degradation of	Regional issues include natural resource management issues.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	resources	Otago's natural resources		<u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time <del>will</del> <u>can</u> cause serious damage."	
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected <u>from inappropriate subdivision, use and development</u> ."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <del>Natural</del> <u>Environmental</u> systems <u>and resources</u> are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely affects the <u>environmental</u> value of another..."	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural <del>and physical</del> resources are recognised, <u>and protected from inappropriate subdivision, use and development</u> <del>, maintained and enhanced.</del> "	<ul style="list-style-type: none"> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to: ... c) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... j) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and k) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and l) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ... b) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and ... g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.

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				h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and..."	
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... g) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and h) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend b) as follows: "b)Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those soils</u> , to: ... f) <del>Retain</del> Ensure the primary use of regionally significant soil resources <u>is</u> for primary production <u>purposes</u> ; and g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and ... k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>The PRPS should be focused on resource management issues of regional significance.</li> <li>Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Amend c) iii. as follows: "iii. Historical <del>and heritage</del> associations".	No reason given.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>As applies to all landscape assessments, including for "Special Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued	Amend	Add the following new policy: "Managing cross boundary landscape effects	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries, which would benefit from a regionally integrated</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		natural resources		<u>Promote alignment of District Plans and integrated assessments of environmental effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries.</u> "	approach. <ul style="list-style-type: none"> <li>• This proposed policy would be as effective as the provisions on Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: " <u>Protect and enhance Manage subdivision, use and development that affects</u> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects <del>on those values which contribute</del> <u>which will result in</u> to the area or habitat <del>losing its being</del> significant status ; and b) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on other values of the area or habitat; and <del>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and ...</del> "	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes <del>, using the attributes as detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• These attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• Schedule 4 should be deleted</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: " <u>Protect, enhance and restore Manage subdivision, use and development that affects</u> the values of outstanding natural features, landscapes and seascapes, by: a) Avoiding adverse effects <del>on those values which contribute to</del> <u>which will result in</u> the <del>loss of the</del> significance of the natural feature, landscape or seascape; and ... <del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and ...</del> ... <u>g) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values</u> <u>(h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate</u> ".	<ul style="list-style-type: none"> <li>• Could disrupt the balance of the values of outstanding natural landscapes and features and other important values.</li> <li>• For example, ski fields are appropriate to locate in alpine environments that may be considered outstanding natural landscapes.</li> <li>• Ensuring such businesses can continue to operate and provide an important recreational and economic resource to Otago should be borne in mind.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding <del>, using the attributes detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of different criteria being used in current or proposed district plans, and hence, creating inefficiencies and potentially slowing down forthcoming district plan reviews. These concerns also relation to Schedule 4.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social wellbeing of communities.
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Amend as follows: " <del>Protect or enhance the values of. <u>Manage</u> special amenity landscapes and highly valued natural features, by:</del> a) <del>Avoiding, <u>remedying or mitigating</u> significant</del> adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and and <del>b) <u>Avoiding, remedying or mitigating other adverse effects on other values;</u> and</del> c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> ... <u>g) Recognising and providing for the use of such resources including as places where productive activities, tourism, recreation, infrastructure, homes and work places are located.</u> h) <u>Allowing values to adapt over time as communities and economies change.</u> "	<ul style="list-style-type: none"> <li>• Level of protection not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it.</li> <li>• Better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category.</li> <li>• The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend as follows: "Preserve or enhance the natural character values of the coastal environment, by: a) <del>Avoiding adverse effects of activities on natural character in areas of the coastal environment with</del> <u>on those values which contribute to the</u> outstanding natural character of an area; and b) <del>Avoiding significant adverse effects <u>and avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment</u></del> <u>on those values which contribute to the high natural character values of an area; and</u> c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> d) <del>Avoiding, remedying or mitigating other adverse effects on other values; and...</del> "	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend as follows: " <del>Protect</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding water bodies and wetlands by: a) <del>Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u></del> , including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and ... <del>c) <u>Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</u></del> ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	Amend as follows: "Policy 2.2.14 Identifying <del>highly valued</del>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<del>regionally significant</del> soil resources Identify areas and values of <del>highly valued</del> <del>regionally significant</del> soil resources, using the following criteria: ... "	
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Amend as follows: "Policy 2.2.15 Managing <del>highly valued</del> <del>regionally significant</del> soil resources Protect the values of <del>areas of highly valued</del> <del>regionally significant</del> soil resources, by: a) Avoiding significant adverse effects <del>from</del> <del>inappropriate subdivision, use and development</del> on those values which contribute to the soil being <del>highly valued</del> <del>regionally significant</del> ; and ... <del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> d) Recognising that <del>loss of regionally significant soils to urban expansion development</del> may be appropriate <del>near</del> <del>due to location and proximity to existing urban development and infrastructure</del> <del>particularly when there is a lack of supply of land available for urban development</del> ."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend as follows: " <del>Natural resource s</del> Systems and their interdependencies are recognised"	No reason given.
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Add the following policy: " <del>Applying an integrated management approach for significant infrastructure and activities that affect significant infrastructure</del> <del>Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure, by:</del> a) <del>Promoting consistent corridor management throughout the region.</del> "	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>• Amend a) as follows: "a) Taking into account the impacts of management of one resource on the <del>environmental</del> values of another, or on the environment in general; and"</li> <li>• Add the following clauses: " <del>c) Ensuring that resource objectives are complementary across administrative boundaries; and</del> <del>d) Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units.</del> "</li> </ul>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete policy.	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
66	Objectives on resilience, health	Issue 3.1 - Risk of overreaching	Amend	Amend as follows: "Activities that <del>utilise</del>	No reason given.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	and safety	the environment's carrying capacity		<del>resources</del> -are undertaken- without regard to their local- environmental values. -are at greater risk inappropriately compromising -of overreaching that- the environment's ability to sustain the activity."	
70	Objectives on resilience, health and safety	Issue 3.5 - Importance of infrastructure of regional or national significance	Amend	Amend as follows: " <u>It is important to recognise and provide for Significant Infrastructure of regional and national significance even though it may result in local adverse environmental effects impacts, or adversely affect other nationally important values...</u> "	Significant infrastructure should be defined, recognised and provided for.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of <del>natural and physical</del> resources recognises environmental constraints".	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising <del>natural and physical</del> environmental constraints Recognise the <del>natural and physical</del> environmental constraints of <u>resources</u> -an area-, the <u>environmental</u> effects of those constraints on activities <u>utilising those resources</u> , and the <u>environmental</u> effects of those activities on those constraints, <del>including with particular recognition of</del> : ... c) The sensitivity of <del>the natural and physical</del> resources to adverse effects from the proposed activity/land use; and ..."	No reason given.
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Amend Objective 3.2 as follows: " <u>Inappropriate</u> risk that natural hazards pose to Otago's communities are minimised"	Designing to a 100 year level may be appropriate, but it would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities <del>including hazards of low likelihood and high consequence.</del> "	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows: "Manage natural hazard risk, <del>including</del> with <u>particular</u> regard to: a) The risk <del>they</del> posed, considering the likelihood and consequences of natural hazard events; and ..."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend 1st sentence as follows: "Assess activities <u>in areas known to be subject to an identified</u> <del>for</del> natural hazard risk, by considering:..."	No reason given.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Policy 3.2.6 Avoiding increased natural hazard risk <u>from inappropriate subdivision, use and development</u> Avoid <u>remedy or mitigate increased</u> <del>increasing</del> natural hazard risk <u>from inappropriate subdivision, use and development</u> , including by:..."	<ul style="list-style-type: none"> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• It would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend 1st sentence as follows: "Reduce existing natural hazard risk, <del>including particularly</del> by:".	No reason given.
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) There is significant <del>public or environmental</del> benefit in doing so; or b) The work relates to the functioning ability of <u>significant infrastructure, a lifeline utility, or facility used for essential or emergency services, or a significant community facility.</u> "	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ... b) Designing infrastructure to take into account: ... iv. <del>Natural and physical</del> Resource constraints; and v. Effects on the values of natural and physical resources; and ... c) Managing urban growth <u>in a coordinated manner to ensure</u> : i. <del>Within areas that have</del> sufficient infrastructure <u>services are provided</u> <del>capacity</del> ; or ii. <del>Where infrastructure services can be upgraded or extended</del> efficiently and effectively ; and d) <del>Co-ordinating the design and development of infrastructure with the staging of land use change, including with:</del> i. <del>Structural design and release of land for new urban development;</del> or ii. <del>Structural redesign and redevelopment within existing urban areas.</del> "	<ul style="list-style-type: none"> <li>• Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community costs than benefits in high growth areas.</li> <li>• Regulation of the release of land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend as follows: "Manage infrastructure activities, to: ... b) <del>Reduce. Avoid, remedy or mitigate</del> adverse effects of those activities, including cumulative adverse effects on <del>natural and physical</del> resources; and c) Support economic, social and community <u>needs</u> activities; and d) Improve efficiency of use of <del>natural</del> resources; and e) Protect infrastructure corridors <u>from inappropriate subdivision, uses and development</u> <del>for infrastructure needs, now and for the future</del> ; and ... g) Protect the functioning of <u>significant infrastructure, lifeline utilities</u> and essential or emergency services."	Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend as follows: "Policy 3.4.3 Designing <del>lifeline utilities</del> <u>significant infrastructure</u> and facilities for essential or emergency services Design <del>lifeline utilities</del> <u>significant infrastructure</u> , and facilities for essential or emergency services, to:..."	No reason given.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, <del>lifeline utilities</del> , <u>significant infrastructure</u> , and essential and emergency services".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend as follows: " <u>Significant</u> Infrastructure of national and regional significance is <u>recognised and provided for</u> managed in a sustainable way."	Significant infrastructure should be defined, recognised and provided for.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend as follows: "Policy 3.5.1 Recognising <u>and providing for</u> national and regional- significance of infrastructure Recognise <u>and provide for</u> the national and regional- significance of the following infrastructure: a) Renewable electricity generation facilities ; where they supply the national electricity grid and local distribution network; and ... f) Structures for transportation by rail <u>and tourism activities</u> ."	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The PRPS does not give enough recognition of and provision for the tourism sector.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend as follows: "Policy 3.5.2 Managing adverse effects of <u>significant</u> infrastructure <del>that has national or regional significance</del> <del>Minimise</del> <u>Avoid, remedy or mitigate</u> adverse effects from <u>significant</u> infrastructure <del>that has national or regional significance</del> , by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in:</del> ... b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding</del> <u>minimising</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and ... d) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> e) <del>Considering</del> <u>Enabling infrastructure providers to employ</u> the use of offsetting ; or other compensatory measures <u>to address</u> ; for residual adverse effects on <u>the environment indigenous biodiversity</u> ."	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Protecting <u>significant</u> infrastructure <del>of national or regional significance</del>".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	<p>Amend as follows:</p> <p>"Policy 3.6.2 Promoting small <u>and community</u> scale renewable electricity generation</p> <p>Promote small <u>and community</u> scale renewable electricity generation activities that :</p> <p>a) <del>Increase the local community's resilience and security of energy supply; and</del></p> <p>b) <del>Avoid, remedy or mitigate adverse effects from that activity."</del></p>	No reason given.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	<ul style="list-style-type: none"> <li>Amend 1st sentence as follows: "Protect the generation capacity of <u>nationally or regionally significant</u> renewable electricity generation activities, by..."</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	<p>Amend as follows:</p> <ul style="list-style-type: none"> <li>Delete d).</li> <li>"e) Protecting <del>existing</del> distribution corridors for infrastructure needs, now and for the future."</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	<p>Amend as follows: "Encourage the use of good urban design principles in subdivision and development in urban areas <del>, as detailed in Schedule 6,</del> to:</p> <p>...</p> <p>b) Ensure that the built form relates well to its <u>surrounding</u> <del>natural</del> environment <del>, including by:</del></p> <p>i. <del>Reflecting natural features such as rivers, lakes, wetlands and topography; and</del></p> <p>ii. <del>Providing for ecological corridors in urban areas; and</del></p> <p>iii. <del>Protecting areas of indigenous biodiversity and habitat for indigenous fauna; and</del></p> <p>iv. <del>Encouraging use of low impact design techniques; and</del></p> <p>v. <del>Encouraging construction of warmer buildings</del> ; and</p> <p>..."</p>	<ul style="list-style-type: none"> <li>Schedule 6 not assessed in S32 report.</li> <li>Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>May be to the detriment of good urban design for specific sites.</li> </ul>
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>Schedule 6 not assessed in S32 report.</li> <li>Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>May be to the detriment of good urban design for specific sites.</li> </ul>
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend a) as follows: "a) <del>Maximising</del> <u>Optimising</u> passive solar gain; and"	No reason given.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend as follows: "Design <u>and maintain</u> public spaces, including streets and open spaces, to <u>provide for a range of uses and</u> <del>meeting</del> the reasonable access and mobility needs of all sectors within the community <del>, including the young and those with mobility impairments."</del>	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("including").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	<p>Amend as follows:  <del>"Policy 3.8.1 - Managing - Providing for urban growth</del>  <del>Manage - Provide for</del> urban growth and creation of new urban land in a strategic and co-ordinated way, by:</p> <p>a) <del>Understanding demand and supply of</del> <u>Ensuring there is sufficient residential, commercial and industrial zoned land capacity, to and catering for that demand for such land, projected over at least the next 10 years;</u> and</p> <p>b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to:</p> <p>i. Provide infrastructure in an efficient and effective way; and</p> <p>ii. <del>Avoid - Discouraging</del> <u>additional costs on the public that arise from unplanned infrastructure expansion;</u> and</p> <p>c) Identifying future growth areas that:</p> <p>i. <del>Minimise significant</del> <u>adverse effects on rural the productivity of the rural and tourism sectors, including loss of highly valued soils or creating competing urban demand for water and other resources;</u> and</p> <p>ii. <u>Can be developed without resulting in significant adverse effects on any matter of national importance or national significance. Maintain or enhance significant biodiversity, landscape or natural character values; and</u></p> <p>iii. <u>Maintain important cultural or heritage values; and</u></p> <p><del>iv- iii.</del> <u>iii.</u> Avoid land with significant risk from natural hazards <u>which cannot be remedied or mitigated;</u> and</p> <p>d) Considering the need for urban growth boundaries to control <u>potentially inappropriate</u> urban expansion; and</p> <p>e) Ensuring efficient use of land; and</p> <p>f) Requiring the use of low or no-emission heating systems in buildings, <del>when</del> <u>where</u> ambient air quality <del>in or near the growth area</del> is:</p> <p>i. Below standards for human health; or</p> <p>ii. Vulnerable to degradation given the local climatic and geographical context; and</p> <p>g) Giving effect to the principles of good urban design <del>as detailed in Schedule 6;</del> and</p> <p>h) Giving effect to the principles of crime prevention through environmental design</p>	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community.</li> <li>• Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS.</li> <li>• "Considering the need for urban growth boundaries" should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential methods.</li> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	Delete the policy.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>become embroiled in urban growth management at a local level.</p> <ul style="list-style-type: none"> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<p>Amend as follows: "Manage subdivision, use and development of rural land, to:</p> <p>a) Avoid <u>inappropriate</u> development or fragmentation of land <u>, particularly</u> which undermines or forecloses the potential of rural land:</p> <p>i. For primary production <u>or tourism</u>; or</p> <p>...</p> <p>b) Have particular regard to whether the proposal will result in a loss of the productive potential of <u>regionally significant, highly versatile</u> soils, unless:</p> <p>i. The land adjoins an existing urban area and there is no other land suitable for urban expansion <u>, or there is a shortage of land available for urban development</u>; and</p> <p>ii. <del>There highly versatile soils are needed for urban expansion,</del> any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and</p> <p>iii. reverse sensitivity effects on rural productive activities can be <u>satisfactorily</u> avoided; and</p> <p>c) Avoid unplanned demand for provision of <u>public infrastructure investment</u>, including</p>	<ul style="list-style-type: none"> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				domestic water supply and waste disposal; and d) Avoid creating <u>significant</u> competing demand for water <del>or other</del> resources."	
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk</u> <del>harm</del> human health or the quality of the environment <del>in Otago</del> ".	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend c) as follows: "c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and".	No reason given.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Amend a) as follows: "a) Prior to subdivision or development of potentially contaminated land, <u>requiring</u> <del>ensuring</del> a site investigation is undertaken to determine the nature or extent of any contamination; and"	No reason given.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Amend as follows: "Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably degrade natural values</u> ".	<ul style="list-style-type: none"> <li>• Avoiding the creation of new contaminated land may not always be appropriate or practical: in remediating contaminated land it may be appropriate to move soil to another location depending on where it is situated and how that land is to be used.</li> <li>• The emphasis should be on avoiding risks to human health or the environment.</li> </ul>
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	<ul style="list-style-type: none"> <li>• Add the following objective: "Significant industry activities and physical resources are provided for".</li> <li>• Add the following policy: "Recognising and providing for significant industry activities and physical resources Recognising and providing for significant industry activities and physical resources, by: a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety; b) Protecting significant industry activities from inappropriate subdivision, use, and development; c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated."</li> <li>• Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to: a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and cultural well-being;</li> </ul>	Regionally Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				b) Protect significant industry activities from inappropriate subdivision, use, and development; c) Enable significant industry activities and development that does not have a significant adverse effect on the environment; d) Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance."	
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Amend	Amend as follows: " <del>Sometimes, e</del> Existing businesses may be placed at risk by pressure to change activities are susceptible to reverse sensitivity effects, particularly when land use changes to activities that may compete or conflict, creating reverse sensitivities."	No reason given.
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows: "Many <del>natural and physical</del> resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users."	No reason given.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend as follows: "Maintain and <del>where possible,</del> enhance public access to the natural environment, including to the coast, lakes, rivers and their margins, and areas of cultural or historic significance, unless restricting access is necessary to: ... b) Protect the <del>natural heritage and ecosystem</del> values of sensitive natural areas or habitats; or..."	No reason given.
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: " <del>Significant h</del> Historic heritage resources are recognised and contribute to the region's character and sense of identity".	No reason given.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: " <del>Manage historic heritage values to p</del> Protect and enhance the values of places and areas of historic heritage <del>from inappropriate development</del> , by: ... c) Avoiding <del>remedying or mitigating</del> adverse effects on those values which contribute to the area or place being of regional or national significance; and d) <del>Avoiding significant adverse effects on other values of areas and places of historic heritage;</del> and e) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> f) <del>Remediating, when adverse effects on other values cannot be avoided; and</del> g) <del>Mitigating when adverse effects on other values cannot be avoided or remediated; and</del> h) ..."	<ul style="list-style-type: none"> <li>• The PRPS does not correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
155	Land management for economic	Policy 4.3.1 - Managing for rural	Amend	Amend as follows:	• Significant Industry Activities (tourism and primary production)



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	production	activities		<p><del>"Managing for rural- Protecting regionally significant industry activities from inappropriate subdivision, use and development</del></p> <p>Manage activities in rural areas, to support the region's economy and communities, by:</p> <p>a) Enabling <u>regionally significant industry activities</u> <del>, farming and other rural activities that support the rural economy;</del> and</p> <p>b) Minimising the loss of <u>regionally significant soils</u> <del>highly valued for their versatility for primary production;</del> and</p> <p>c) Restricting the establishment of activities <del>in rural areas</del> that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u>; and</p> <p>d) <del>Minimising</del> <u>Restricting</u> the subdivision of productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and</p> <p>e) Providing for other activities that have a functional need to locate in rural areas <del>, including tourism and recreational activities that are of a nature and scale compatible with rural activities.</del>"</p>	<p>should be defined, recognised and provided for.</p> <ul style="list-style-type: none"> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> </ul>
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Amend	<p>Amend as follows:</p> <p>"Recognising <u>and providing for</u> the values of Otago's central business districts</p> <p>Recognise <u>and provide for</u> the values of Otago's central business districts, including as the primary focal point for social, cultural and economic activities within a community."</p>	No reason given.
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	<p>Amend as follows: "Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of <del>the Otago's</del> central business districts and support local commercial needs, by:</p> <p>a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and</p> <p>...</p> <p>c) Avoiding unplanned extension of commercial activities that has significant adverse effects on <del>the a</del> central business district, including on the efficient use of infrastructure, employment and services; and</p> <p>..."</p>	No reason given.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	<p>Amend as follows: "Manage the finite nature of land suitable and available for industrial activities, by:</p> <p>a) Providing specific areas to accommodate <del>the effects of</del> industrial activities; and</p> <p>b) Providing a range of land suitable for different industrial activities <del>, including land extensive activities;</del> and</p> <p>c) Restricting the establishment of activities in industrial areas that may result in:</p>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				i. Reverse sensitivity effects <u>on industrial activities</u> ; or ii. Inefficient use of industrial land or infrastructure."	
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend as follows: "Managing locational needs for mineral and gas exploration, extraction and processing Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Giving preference to avoiding their location in-</del> <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on:</u> i. ... b) Restricting the establishment of <del>those</del> activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities.</u> "	No reason given.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in-</del> ... e) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and,</del> ... g) Considering the use of offsetting, or compensatory measures, <u>to address</u> <del>for</del> residual adverse effects <u>on the environment</u> ; and ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values <del>only</del> when: a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and b) Those <u>adverse</u> effects cannot be avoided, remedied or mitigated; and c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."	<ul style="list-style-type: none"> <li>• The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection.</li> <li>• Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Amend as follows: " <del>Providing for o</del> Offsetting <del>for</del> <u>from adverse effects on</u> indigenous biodiversity Provide for offsetting <del>for</del> <u>from adverse effects</u> on indigenous biodiversity, when <del>it is enabled,</del> <u>by ensuring that:</u>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				a) The offset achieves no net loss <del>and preferably a net gain</del> in indigenous biodiversity values; and b) The offset is undertaken close to the location of development <del>, where this will result in the best ecological outcome</del> ; and..."	
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	Add the following method: "1.1.4 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."	No reason given.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<ul style="list-style-type: none"> <li>Amend Method 1.2.1 as follows: "Identify <del>and protect from inappropriate subdivision, use and development</del>, places, areas or landscapes of cultural, spiritual or traditional significance to them;"</li> <li>Amend Method 1.2.2 as follows: "Identify, and protect <del>from inappropriate subdivision, use and development</del>, the values that contribute to their significance;"</li> <li>Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</li> </ul>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Oppose	Delete Method 1.4.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Oppose	Delete Method 2.2	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Oppose	Delete Method 2.3.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting <del>from inappropriate subdivision, use and development</del> , historic heritage places <del>or</del> <del>areas</del> <del>or</del> <del>landscapes</del> located in the beds of rivers, lakes and wetlands or the coastal marine area;"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.12.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7.	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>Unnecessary or ambiguous ("may").</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing	Amend	Amend Method 4.2.1 as follows:	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		district plans		"City or district councils will implement Policies 3.2.2 and 3.2.3 <u>to the extent applicable</u> when undertaking natural hazard assessments".	
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend Method 6.1.2 as follows: "Regional, city and district councils, in their areas of responsibility, will identify: ... <del>d) Special amenity landscapes;</del> ... <u>g) Regionally significant soil resources;</u> <u>h) Significant infrastructure;</u> "	<ul style="list-style-type: none"> <li>Concerned about introducing the term of Special Amenity Landscapes.</li> <li>Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> <li>Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. Too high a level of protection could have adverse effects on the economic and social wellbeing of communities.</li> <li>Significant infrastructure should be defined, recognised and provided for.</li> </ul>
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Oppose	Delete Method 7.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
211	Method 8 - Education and Information	Method 8.1.1 - Information from regional, district and city councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
214	Method 8 - Education and Information	Method 8.1.4 - Information from city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
215	Method 9 - Funding	Method 9 - Funding	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
220	Method 11 - Advocacy and Facilitation	Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional	Oppose	Delete Methods.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Amend d) as follows: "d) Facilitate coordination between <del>lifeline utilities</del> <u>significant infrastructure and significant community facilities used</u> for emergency management, including by: i) Recognising the interconnections between <u>significant infrastructure</u> <del>lifeline utilities</del> ..."	No reason given.
225	Method 11 - Advocacy and Facilitation	Method 11.2.3 - Facilitation by regional, city and district councils	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction,</li> </ul>

Ref	Issue	Provision - optional	Position	Decision Requested	Reason for Decision Requested
248	Appendices	Appendices - general	Oppose	<ul style="list-style-type: none"> <li>Delete Appendix 1.</li> <li>Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS.</li> </ul>	<p>strengthen the PRPS &amp; result in efficiency gains.</p> <ul style="list-style-type: none"> <li>Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and</li> <li>Is not required by RMA S62 or is not an active directive.</li> </ul>
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>Add the following definitions: <ul style="list-style-type: none"> <li>Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance;</li> <li>Significant Community Facility - include facilities that provide essential community services;</li> <li>Urban;</li> <li>Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS;</li> <li>Regionally Significant Industry Activity - include any activity associated with tourism or primary production;</li> <li>Hard mitigation measures;</li> </ul> </li> <li>Amend definition of Kai Tahu to clarify if has the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning documents outside Otago.</li> </ul>	To reduce ambiguity and enable more efficient implementation of the PRPS.
250	Glossaries	Glossary of Te Reo terms	Oppose	Delete and include these terms in the Glossary.	Unnecessary to have 2 separate glossaries.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Delete or amend text that: <ul style="list-style-type: none"> <li>Is duplicated;</li> <li>Is vague or ambiguous;</li> <li>Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation;</li> <li>Is not required by RMA S62 or is not an active directive; and</li> <li>Delete all "need" statements.</li> </ul>	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>"Need" statements are not required by RMA S62 or is not an active directive.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	Any consequential or other amendments required to give effect, or like effect, to any matter raised in the submission.	No reason given.

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1	Overall approach	Whole Regional Policy Statement (general support)	Support	Notwithstanding comments made on specific relief sought, FANZ generally supports the approach by Otago Regional Council to provide for primary production in the Proposed RPS.	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend as follows: "The values of Otago's natural and physical resources are recognised, maintained <del>and</del> <u>or</u> enhanced."	The broad nature of the objective is supported but FANZ considers that it should be reworded as values cannot be maintained and enhanced; it is generally a case of either maintain or enhance, which in relation to freshwater resources is consistent with Objective A2 of the National Policy Statement for Freshwater Management (NPS-FM) which used the terms maintain or improve.
31	Natural resource value	Policy 2.1.1 - Managing for	Amend	Amend as follows:	The policy is unclear as to how freshwater will be managed and it

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	management - general	freshwater values		<p>"Recognise freshwater values, and manage <u>the effects of activities which impact on</u> freshwater, to:</p> <p>...</p> <p>c) Protect <u>the significant values of</u> outstanding water bodies and wetlands; and</p> <p>...</p> <p>f) Maintain good water quality, including in the coastal marine area, or <del>enhance</del> <u>improve</u> it where it has been degraded <u>by human activities</u>; and</p> <p>...</p> <p>j) <u>Protect protected customary rights and avoid, remedy or mitigate adverse effects on</u> Kai Tahu values; and</p> <p>k)...</p> <p>l) <del>Protect</del> <u>Avoid, remedy or mitigate adverse effects on</u> important recreation values; and</p> <p>..."</p> <ul style="list-style-type: none"> <li>• Provide clarification on the intended triggers and outcome of clause f).</li> </ul>	<p>would be more accurate to refer to the management of the effects of activities that could have an impact on freshwater quality and quantity.</p> <ul style="list-style-type: none"> <li>• Clause c) should be amended to reflect the NPSFM which requires the protection of "significant values".</li> <li>• Clause (f) appears to be the principle policy on water quality. Needs clarity on the terms "good" and "degraded".</li> <li>• FANZ supports clause (i)</li> <li>• Clause j) requires the protection of Kai Tahu values, and clause (l) requires the protection of important recreational values, which would require avoidance of any effects on these values. This is onerous and not in accordance with the RMA.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	<ul style="list-style-type: none"> <li>• Clarification on the intended triggers and outcome of clause c)</li> <li>• Amend Policy 2.1.2 as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ...</li> </ul> <p>b) Protect <u>the significant values of</u> outstanding water bodies and wetlands; and</p> <p>c) Maintain good water quality, or <del>enhance</del> <u>improve</u> it where it has been degraded <u>by human activities</u>; and</p> <p>...</p> <p>g) Protect <u>protected customary rights and avoid, remedy or mitigate significant adverse effects on</u> Kai Tahu values; and</p> <p>..."</p>	<p>Opposes clauses b), c) and g) for the same reasons as discussed under Policy 2.1.1.</p>
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	<ul style="list-style-type: none"> <li>• Amend as follows: "Recognise soil values, and manage <u>the effects of activities which impact on</u> soils, to: ...</li> </ul> <p>e) Maintain soil's function as a buffer or filter for <del>pollutants</del> <u>contaminants</u> resulting from human activities <u>and natural events</u>, including <u>for the protection of aquifers at risk</u>, <del>aquifers at risk</del> of leachate contamination; and</p> <p>f) Retain soil resources for primary production; and</p> <p>g) Protect <u>protected customary rights and avoid, remedy or mitigate adverse effects on</u> Kai Tahu values; and</p> <p>...</p> <p>k) <del>Avoid</del> <u>Ensure that the accumulation of contamination of</u> <u>contaminants</u> in soils <u>is managed and does not cause a reduction in</u></p>	<ul style="list-style-type: none"> <li>• Supports the policy's approach and the use of best management practices. However the Policy as notified, provides no direction on how soils will be managed. FANZ considers that this is likely to be achieved through the management of the potential effects of activities rather than management of the soil itself, and therefore seeks to amend the Policy.</li> <li>• Supports clauses a) to d) as important matters.</li> <li>• Opposes clause e) because 'pollutants' are not defined. The clause also considers pollutants from human activities but not those deriving from natural events such as flooding. Furthermore, whilst it could be assumed that the reference to aquifers is pertaining to the fact that soil can filter contaminants and protect groundwater, the wording of the clause is unclear.</li> <li>• Clause g) requires the protection of Kai Tahu values, which would require avoidance of any effects on these values. This is onerous especially as it is unclear what is meant by 'Kai Tahu values'.</li> <li>• Opposes clause k) as it is not possible to avoid contamination of soil. Fertilisers are recognised as a contaminant under the RMA definition</li> </ul>

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				<u>the range of existing and foreseeable uses of the soil resource</u> ; and l) ..."	of the term. Consequently, this policy contradicts other policies in the Proposed RPS that provide for farming activities.
54	Highly valued natural resources - outstanding water bodies	Policy 2.2.12 - Identifying outstanding water bodies and wetlands	Amend	Amend as follows: "Identify outstanding water bodies and wetlands and their <u>significant</u> values, using the following criteria: a) <del>A high degree of</del> Naturalness; b) <del>Outstanding</del> Aesthetic or landscape values; c) <u>Landscape values</u> ; d) <del>Significant</del> Takata whenua cultural values; e) <del>Significant</del> Recreational values; f) <del>Significant</del> Ecological values; g) <del>Significant</del> Hydrological values."	<ul style="list-style-type: none"> <li>The NPSFW requires the protection and therefore identification, of the significant values of outstanding freshwater bodies. As such, FANZ seeks that the Policy is amended accordingly.</li> <li>Furthermore, the criteria should be amended to remove any determination of scale (i.e. 'a high degree') as the Policy is sought to be amended to refer to 'significant values' only.</li> <li>FANZ considers that any analysis of waterbodies will be undertaken as part of a region or district wide assessment or for a consent application using the identified criteria to ensure a consistent approach. FANZ has assumed that any identification will be undertaken by a suitably qualified and experienced person(s) to ensure a stringent methodology is followed.</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend as follows: "Protect the <u>significant</u> values of outstanding water bodies and wetlands by: <u>a) Assessing the significance of adverse effects on significant values, as detailed in Schedule 3; and</u> a) <del>b)</del> Avoiding significant adverse effects, including cumulative effects, on those <u>significant</u> values which contribute to the water body or wetland being outstanding; and b) <del>c)</del> Avoiding, remedying or mitigating other adverse effects on the water body or wetland's values; and c) <del>e)</del> <u>Assessing the significance of adverse effects on values, as detailed in Schedule 3;</u> d) ..."	<ul style="list-style-type: none"> <li>FANZ supports the intent of the Policy.</li> <li>As notified, the assessment of the significance of effects is set out under clause c) below the clause that seeks to avoid significant adverse effects. As such, it is considered that these clauses should be re-arranged to provide for the assessment and then avoidance of significant adverse effects.</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	Amend as follows: "Identify areas <del>and values</del> of highly valued soil resources, using the following criteria: a) <del>Degree of</del> Versatility for primary production; b) <del>Significance for providing pollutant</del> <u>Contaminant</u> buffering or filtering services; c) <del>Significance for providing</del> Water storage or flow retention services; d) <del>Degree of</del> Rarity."  (ii) Provide quantitative or qualitative criteria to enable consistent region wide identification of highly valued soils.	<ul style="list-style-type: none"> <li>The policy as worded is confusing. The values have already been attributed to the soil resource, being the criteria listed i.e. versatility and do not need to be identified.</li> <li>The policy does not provide any means of assessing whether there is a high degree of versatility, for example are soils to be ranked using a quantitative or qualitative analysis. FANZ considers any analysis of soils will be undertaken as part of a region or district wide assessment or for a consent application using the identified criteria to ensure a consistent approach. FANZ has assumed that any identification will be undertaken by a suitably qualified and experienced person(s) to ensure a stringent methodology is followed.</li> <li>FANZ also considers that, as discussed above, the term 'pollutant' should be replaced with 'contaminant' in clause b).</li> </ul>
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Amend as follows: "Protect the values <del>of areas</del> of highly valued soil resources, by: <u>a) Assessing the significance of adverse effects on values, as detailed in Schedule 3; an</u> a) <del>b)</del> Avoiding significant adverse effects on those values which contribute to the soil being highly valued; and b) <del>c)</del> Avoiding, remedying or mitigating other adverse effects on values of those soils; and	<ul style="list-style-type: none"> <li>Supports the intent of the Policy.</li> <li>As notified, the assessment of the significance of effects is set out under clause c) below the clause that seeks to avoid significant adverse effects. As such, it is considered that these clauses should be re-arranged to provide for the assessment and then avoidance of significant adverse effects.</li> <li>Deletion of clause d) is requested as it is not about protecting areas of highly valued soil resources. Urban expansion should be considered in accordance with Schedule 3 and on a case by case basis rather than being provided for through the policy framework.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				-c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and d) Recognising that urban expansion may be appropriate due to location and proximity to existing urban development and infrastructure."	• The Policy is not directive, for example what matters will be considered in determining when urban expansion is more appropriate than protecting highly valued soils.
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Support	Retain Objective 2.3 as notified.	FANZ recognises the importance of maintaining the interdependencies of natural systems as primary production also relies, to a certain extent, on this.
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Support	• Retain Policy 2.3.1 as notified. • Clarification of how Policy 2.3.1 b) will be implemented in practice.	FANZ recognises the importance of applying an integrated management approach to and within Otago's natural and physical resources but is concerned how part b) of Policy 2.3.1 will be implemented.
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Support	Retain Policy 2.3.2 as notified.	FANZ recognises the importance of applying an integrated management approach to and within Otago's natural and physical resources.
62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Amend	Amend Policy 2.3.3 as follows: "Apply an integrated management approach to activities in freshwater catchments, by: ... c) Coordinating the management of land use and freshwater, to: i. Maintain or <del>enhance</del> <u>improve, where degraded by human activities to the point of being over-allocated,</u> freshwater values; and ii. Maintain or <del>enhance</del> <u>improve, where degraded by human activities to the point of being over-allocated,</u> the wetland values; and iii. <u>Maintain or enhance, where degraded, the soil resource values; and</u> iii. <u>iv.</u> Maintain or enhance the values of beds of rivers and lakes, wetlands, and their margins; and iv. <u>v.</u> <del>Reduce</del> <u>Manage</u> the potential for health and nuisance effects."	• Opposes clause c) of Policy 2.3.3 because there is no guidance on when 'maintain' will be preferred over 'enhancement'. • If Policy 2.3.3 is referring to integrated catchment management that clause c) should also include a direction to maintain or enhance soils. A freshwater management catchment should include consideration of the adjoining land. • Policies 2.3.3, 2.3.4 and 2.3.5 refer to 'reducing' the potential for health and nuisance effects. This is not always feasible or necessary to 'reduce' and the wording of the policies should be amended to reflect a more realistic approach of 'managing' the potential for effects.
63	Natural systems and interdependencies	Policy 2.3.4 - Applying an integrated management approach for the coastal environment	Amend	Amend as follows: "Apply an integrated management approach to activities in the coastal environment, by: a) ... b) Coordinating the management of land use, freshwater, and coastal water, to: i. Maintain or enhance coastal values; and ii. <del>Reduce</del> <u>Manage</u> the potential for health and nuisance effects."	• Policies 2.3.3, 2.3.4 and 2.3.5 refer to 'reducing' the potential for health and nuisance effects. This is not always feasible or necessary to 'reduce' and the wording of the policies should be amended to reflect a more realistic approach of 'managing' the potential for effects.
64	Natural systems and interdependencies	Policy 2.3.5 - Applying an integrated management approach for airsheds	Amend	Amend as follows: "Apply an integrated management approach to activities that affect air quality, by: a) ... b) Co-ordinating the management of land use and air quality, to: i. Maintain or enhance air quality values; and ii. <del>Reduce</del> <u>Manage</u> the potential for adverse health and nuisance effects."	• Policies 2.3.3, 2.3.4 and 2.3.5 refer to 'reducing' the potential for health and nuisance effects. This is not always feasible or necessary to 'reduce' and the wording of the policies should be amended to reflect a more realistic approach of 'managing' the potential for effects.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and	Oppose	[Oppose Objective 3.1]	• Opposes proposed Objective 3.1 and Policy 3.1.1 on the basis that this objective and policy are considered in tandem with those



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		physical resources recognises environmental constraints			providing for agricultural production and its benefits. Acceptable use and development of natural and physical resources within environmental limits is provided for by other Objectives, and Policies within the Proposed RPS. <ul style="list-style-type: none"> <li>• Furthermore the objective and policy may be used to prevent development and/or activities because of 'perceived' constraints. Some constraints can be managed through the use of innovation, flexibility and technology.</li> </ul>
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Oppose	<ul style="list-style-type: none"> <li>• Delete Policy 3.1.1 or alternatively,</li> <li>• Amend as follows:  "Recognise the natural and physical environmental constraints of an area, the effects of those constraints on activities, and the effects of <del>these</del> activities on those constraints, including:  a) ...  b) ...  c) ...  d) ...  e) ...  <u>Whilst taking into consideration opportunities for innovative and technological solutions to constraints</u>"</li> </ul>	<ul style="list-style-type: none"> <li>• Opposes proposed Objective 3.1 and Policy 3.1.1 on the basis that this objective and policy are considered in tandem with those providing for agricultural production and its benefits. Acceptable use and development of natural and physical resources within environmental limits is provided for by other Objectives, and Policies within the Proposed RPS.</li> <li>• Furthermore the objective and policy may be used to prevent development and/or activities because of 'perceived' constraints. Some constraints can be managed through the use of innovation, flexibility and technology.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend as follows: "Policy 3.8.3 Managing fragmentation of rural land Manage subdivision, use and development of rural land, to: ... b) Have particular regard to whether the proposal will result in a loss of the productive potential of highly versatile soil, <u>unless taking into consideration whether:</u> i. ..."	<ul style="list-style-type: none"> <li>• Supports the intent of the Policy.</li> <li>• There should not be a policy presumption in favour of urban expansion over the protection of versatile soils.</li> <li>• Any consideration should be undertaken on a case by case basis recognising the importance and value of versatile soils versus the need for urban expansion.</li> </ul>
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Amend as follows: "Objective 3.9 Hazardous substances and waste materials do not <del>harm human health or the quality of the environment in Otago</del> <u>result in significant adverse effects on the health and the safety of people or the environment</u> "	The terms 'harm' and 'quality of the environment' are fairly vague terms that can be interpreted in a number of ways.
129	Hazardous substances and waste	Policy suite 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Include a new policy as follows: " <u>Manage the use, storage and disposal of hazardous substances and the storage and disposal of waste materials to avoid significant adverse effects on the health and safety of people.</u> "	The matter as to why spillage and release of substances should be avoided should be provided for in a new policy that reflects the overarching objective.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend as follows: "Manage the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials, to avoid accidental spillage or release of those substances and materials, by: a) Providing secure containment of those substances <del>in case of accidental spillage</del> ; and ... c) <del>Avoiding adverse effects of those</del>	<ul style="list-style-type: none"> <li>• Supports the intent of the Policy.</li> <li>• The reference to 'other values' introduces uncertainty and the policy needs to be more specific.</li> <li>• The name of the Policy is not reflected in the wording of the Policy</li> <li>• Clause c) seems to be directed at why spillage and release of substances should be avoided rather than how, as per the other clauses. This matter is more appropriately provided for in a new policy that reflects the overarching objective.</li> <li>• The reference to 'in case of accidental spillage' in Clause a) is effectively a repeat of the overarching purpose of the Policy.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				substances and materials on the health and safety of people, and on other values; and ..."	
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Amend as follows: "Policy 3.9.4 Managing the use of contaminated land Manage the use of contaminated land, to protect people and the environment from adverse effects, by: ... b) Where there is <del>contamination</del> contaminated land: i. Requiring an assessment of associated environmental risks; and ii. Remediating land; and ..."	<ul style="list-style-type: none"> <li>• The term 'contamination' is poorly defined.</li> <li>• Contamination does not always have the same meaning as 'contaminated land' and does not always require an assessment of risk or remediation.</li> <li>• Suggested amendment reflects the intent of the policy</li> </ul>
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Amend as follows: "Policy 3.9.5 Avoiding the creation of new contaminated land <u>Manage activities that involve the use, manufacture, storage and disposal of hazardous substances to avoid the creation of new contaminated land.</u> "	<ul style="list-style-type: none"> <li>• Applying contaminants to the land (such as fertiliser) or operating a potentially hazardous facility does not necessarily mean the land is contaminated.</li> <li>• Applying contaminants to land will not always result in contaminated land as defined in the RMA.</li> <li>• As written this is not a policy, but rather it is a statement more like an objective and gives no indication of how it will be achieved.</li> <li>• Need to clarify the intent of the Policy.</li> </ul>
135	Hazardous substances and waste	Policy 3.9.6 - Encouraging use of best management practices for hazardous substance use	Amend	Amend as follows: "Policy 3.9.6 Encouraging use of best management practices for hazardous substance use Encourage the use of best management practices to <del>prevent</del> avoid, remedy or mitigate adverse effects of the use of hazardous substances on the environment, <del>including reducing their use</del> and on the health and safety of people."	<ul style="list-style-type: none"> <li>• Generally supports the Policy but seek to rely on best practice.</li> <li>• If best practice is being followed the use of the products should not be excessive.</li> <li>• Suggested amendment to refer to effects on the health and safety of people.</li> </ul>
136	Hazardous substances and waste	Policy 3.9.7 - Encouraging services for hazardous substances collection, recycling and disposal	Support	Retain as notified.	Support the establishment of services that will assist farmers to dispose of their hazardous substances responsibly, thus reducing the risk of adverse effects on people and the environment.
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for economic production	Amend	Amend as follows: "Objective 4.3 Sufficient land is managed and protected for economic production <u>to ensure the social and economic wellbeing of the region.</u> "	<ul style="list-style-type: none"> <li>• The intent of the Objective is supported.</li> <li>• The Objective as notified is incomplete as it unclear what level of economic production is sought to be managed and protected.</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows: "Policy 4.3.1 Managing for rural activities Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling farming and other rural activities that support the <del>rural</del> <u>local, regional and national</u> economy; and ..."	<ul style="list-style-type: none"> <li>• The policy should reflect the fact that farming and other rural activities support the local, regional, if not the national economy.</li> </ul>
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Support	Retain as notified.	Support this policy, as it seeks to protect land for industrial development and enable it to be used without restriction from reverse sensitivity
165	Making the most of available resources	Policy 4.4.3 - Encouraging environmental enhancement	Amend	Amend as follows: "Policy 4.4.3 Encouraging environmental	Supports the Policy in general but seek assurance that it will be considered in conjunction with other policies in the Proposed RPS that

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				enhancement Encourage activities which contribute to enhancing the natural environment, including to: ... <u>whilst providing for the social and economic wellbeing of the community.</u> "	provide for farming and other activities.
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Amend	Amend as follows: "Policy 4.5.1 Avoiding objectionable discharges Avoid, <u>remedy</u> or <u>mitigate</u> discharges that are objectionable or offensive to takata whenua and the wider community, including: a. Discharges of human or animal waste: i. Directly to <u>waterbodies</u> ; or ii. In close proximity to <u>waterbodies</u> ; or iii. In close proximity to mahika kai sites; or b) Discharges of hazardous or noxious substances close to sensitive activities, including: i. Residential activities; or ii. Schools and other educational activities; or iii. <del>Places of public access to the natural environment</del> <u>Publicly accessible areas in the natural environment</u> ; or iv. In close proximity to mahika kai sites; or c) Odorous or conspicuous discharges."	<ul style="list-style-type: none"> <li>• Supports the intent of the Policy.</li> <li>• Some of the terms used are ambiguous and could be interpreted in a number of ways.</li> <li>• 'close proximity' is a vague term.</li> <li>• The Policy should refer to 'waterbodies' rather than generically refer to 'water'.</li> <li>• The Policy should be amended to provide for the avoidance, remediation and mitigation of effects.</li> <li>• It is unclear what is meant by 'places of public access'.</li> </ul>
169	Management of adverse effects	Policy 4.5.2 - Applying an adaptive management approach	Support	Retain as notified.	Supports the adaptive management approach.
177	Roles and responsibilities	Roles and responsibilities	Amend	Amend as follows: "Regional council will: Specify objectives, policies and methods for the control of the use of land for: ...; b. The management of hazardous substances to: i. <del>prevent or</del> <u>avoid, remedy</u> or mitigate the actual or potential adverse effects of discharges of hazardous substances to land or air; ii. control the use, storage, disposal or transportation of hazardous substances in the beds of rivers, lakes and wetlands or the coastal marine area; ..."  "City and district councils will: Specify objectives, policies and methods for the control of the use of land for: ... b. The <del>prevention</del> <u>avoidance, remediation</u> or mitigation of the adverse effects of the storage, use, transport or disposal of hazardous substances on the environment outside of the beds of rivers, lakes and wetlands or the coastal marine area; ..."	<ul style="list-style-type: none"> <li>• Need to be aligned more closely with the intent of the RMA</li> </ul>
228	Anticipated Environmental Results	AER 1.2 - Kai Tahu values and culture are respected and able to	Not Applicable	Provide the cultural health indicator targets to submitters to enable them to make an informed	<ul style="list-style-type: none"> <li>• It is difficult to determine whether to oppose or support this when the cultural health indicator targets are not identified.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		be expressed		decision.	
230	Anticipated Environmental Results	AER 2.2 - Otago's water bodies support healthy ecosystems, are safe for swimming, and maintain their natural form and character	Support	Retain as notified.	No reason given.
232	Anticipated Environmental Results	AER 2.4 - The quality of Otago's soils is maintained or enhanced	Support	Retain as notified	No reason given.
249	Glossaries	Glossary	Amend	Include the RMA definition of 'contaminated land' in the Glossary as follows: "Contaminated Land means land that has a hazardous substance in or on it that- (a) has significant adverse effects on the environment: or (b) is reasonably likely to have significant adverse effects on the environment."	• Contaminated land is defined under the RMA.
249	Glossaries	Glossary	Amend	• Include the RMA definition of "contaminant" in the Proposed RPS. " <u>Contaminant includes any substance (including gases, odorous compounds, liquids, solids, and micro-organisms) or energy (excluding noise) or heat, that either by itself or in combination with the same, similar, or other substances, energy, or heat- (a) when discharged into water, changes or is likely to change the physical, chemical or biological condition of water; or (b) when discharged onto or into land or into air, changes or is likely to change the physical, chemical, or biological condition of the land or air onto or into which it is discharged.</u> "	Fertilisers are recognised as a contaminant under the RMA definition of the term.
258	Other comments	Consequential amendments & other amendments providing relief	Amend	Make any consequential amendments.	No reason given.
290	Objectives on resilience, health and safety	Introduction to Objective 3.9	Amend	Amend the narrative under Objective 3.9 as follows: "Waste materials are an end product of resource use and must be carefully managed to avoid creating environmental problems. Hazardous substances <del>are dangerous</del> <u>can present a number of hazards from very mild (such as mild skin irritants) to significant (such as explosive or highly toxic substances) but hazardous substances are essential</u> components of some activities. Hazardous substances and their waste should also be managed to avoid creating environmental problems or adversely affecting human health."	• Not all substances with a Hazardous substances classification would normally be considered dangerous (e.g. common table salt).

### 111 W.G. Nagle

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Amend references to 'economy' throughout Proposed RPS to 'sustainable wellbeing'.	Where in the Local Government Act does it give councils a mandate to consider 'economy'? The LGA talks about 'sustainable regional well being'.
4	Overall approach	Introduction - RPS framework	Amend	• Include an explanation of where the RPS sits in the decision making process - what is its	At present it reads like bureaucracy for the sake of it.

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				authority and who has responsibility? • A flow diagram to show how the AER (p108) relate to the various policies would remove guesswork and be very helpful.	
7	Chapter B1 - Kai Tahu values	Chapter B1 - general requests	Amend	Amend Proverb in Part B, P 15 to reflect reality..	<ul style="list-style-type: none"> <li>• The dams on the Mata-au, and other waterways, have destroyed the connection from source to mouth and affected ikawai and tuna.</li> <li>• The loss of sandbanks and gravel bars has affected nesting sites for endangered birds</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Explain what is meant by 'good' water quality and ecosystem 'health'.	No reason given
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend.	<ul style="list-style-type: none"> <li>• Policy 2.1.5 a) - k) - No recognition is given to the destruction of soils from burn-off and from unsuitable use of light, and very old, inland soils.</li> <li>• Policy 2.1.5 l) - Use of the term 'pest' has strict and inadequate connotations. Very few harmful introduced species have a 'pest' designation. Pest indicates an economic value can be assigned, but harm caused to native species by invasive species is usually difficult to value so is often not valued at all.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	<ol style="list-style-type: none"> <li>1. Amend to include 'add to'.</li> <li>2. Amend to include 'woody vegetation'</li> </ol>	<ul style="list-style-type: none"> <li>• It is not enough to 'maintain or enhance ecosystem health and indigenous biodiversity'!</li> <li>• Otago has lost so much biodiversity that parts of it lead the county in terms of loss – a damning indictment on the lack of action by territorial authorities.</li> <li>• We continue to lose our birthright. Burning and clearance of 'scrub' and use of unsuitable soils for intensive pastoralism.</li> <li>• More land must be restored to native species to provide resilient ecosystems as a buffer against a changing climate. We know what to do and how to do it. Let's get on with it!</li> <li>• Tussocks are not the only plant providing 'hydrological services'. Woody vegetation has a critical role in harvesting, water, reducing run-off and protecting against erosion. The indiscriminate removal of 'grey scrub' has serious consequences.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Restoration of degraded land must be part of the solution.	'Protect and enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna' is not enough.
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Support but: <ul style="list-style-type: none"> <li>• want to ensure we have the information to be able to do this, and</li> <li>• want to include terrestrial environment</li> </ul>	<ul style="list-style-type: none"> <li>• A great concept if we have the information to be able to do it. Do we? Or is just meaningless burble?</li> <li>• Why is the terrestrial environment not included?</li> </ul>
88	Natural hazard risk	Policy 3.2.8 - Applying a precautionary approach	Amend	Amend [to describe the precautionary approach.]	<ul style="list-style-type: none"> <li>• The "precautionary approach" is not described anywhere.</li> <li>• NZ is a Party to the Convention on Biological Diversity .</li> <li>• Where there is a threat of significant reduction or loss of biological diversity, lack of full scientific certainty should not be used as a reason for postponing measures to avoid or minimize such a threat.</li> <li>• An analyst should gather evidence on the possible forgone opportunities of irreversible changes and remind the decision maker of the need to use the precautionary principle in these cases.</li> </ul>
92	Objectives on resilience, health and safety	Objective 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Amend	Amend [to recognise the likely biological consequences of climate change.]	<ul style="list-style-type: none"> <li>• There is no recognition of the likely biological consequences of climate change.</li> <li>• It is likely that invasive species that are currently 'sleeping' may wake up with a warmer and wetter climate on which to thrive. Others</li> </ul>

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					may disperse from one ecotone to another. <ul style="list-style-type: none"> <li>Communities will need resilient ecosystems to support them and the components of those ecosystems that have evolved here should have a better chance of surviving a changing climate.</li> </ul>
108	Energy	Policy suite 3.6 - Energy supplies to Otago's communities are secure and sustainable	Amend	Add "solar energy" as a specific policy.	To take advantage of our latitude.
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	Specify that, to be successful, ecological corridors must have locally sourced plants, not out of area imports.	No reason given.
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for economic production	Amend	Land should be managed/ protected for its own sake. Not just for "economic production".	<ul style="list-style-type: none"> <li>"economic production" is far too broad a description.</li> <li>We cannot make more land.</li> </ul>
162	Making the most of available resources	Policy suite 4.4 - Otago's communities can make the most of the natural and built resources available for use	Amend	There needs to be recognition of the sensible use of water on light soils.	No reason given
172	Management of adverse effects	Policy 4.5.5 - Controlling the introduction and spread of pest plants and animals	Amend	Amend.	<ul style="list-style-type: none"> <li>Use of the term pest has strict and inadequate connotations.</li> <li>Very few harmful introduced species have a "pest" designation.</li> <li>Pest indicates an economic value can be assigned, but harm caused to native species by invasive species is usually difficult to value so is often not valued at all.</li> </ul>
229	Anticipated Environmental Results	AER 2.1 - The extent of, and values of, significant and highly valued natural resources and heritage in Otago are protected or enhanced	Amend	Add an indicator showing the land area of restored native ecosystems.	No reason given.
230	Anticipated Environmental Results	AER 2.2 - Otago's water bodies support healthy ecosystems, are safe for swimming, and maintain their natural form and character	Amend	Add "biological, chemical and physical" to "Regular monitoring of water quality indicator values".	No reason given
233	Anticipated Environmental Results	AER 2.5 - The health and diversity of Otago's ecosystems is maintained or enhanced	Amend	Amend.	<ul style="list-style-type: none"> <li>Use of the term "pest" has strict and inadequate connotations.</li> <li>Very few harmful introduced species have a "pest" designation.</li> <li>Pest indicates an economic value can be assigned, but harm caused to native species by invasive species is usually difficult to value so is often not valued at all.</li> </ul>
239	Anticipated Environmental Results	AER 3.4 - Adverse effects on highly-valued resource values from nationally and regionally significant infrastructure are avoided or mitigated	Amend	Add "area of restored or repaired native ecosystems is increased".	No reason given.
264	Objectives on Kai Tahu values	Introduction to Objective 1.2	Amend	Amend reference to "a healthy functioning natural environment" on page 19.	There is no definition of what this is, which leaves it open to argument.

### 112 Graymont (NZ) Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	<ul style="list-style-type: none"> <li>Recognise the need to protect mineral resources from encroachment by incompatible land uses that could reasonably be located elsewhere.</li> <li>Recognise that rural areas do and could include appropriate industrial activities which should not be compromised by other activities (especially residential and rural-residential activities).</li> </ul>	<ul style="list-style-type: none"> <li>The PRPS does not contain appropriate or sufficient provisions that promote the responsible use of minerals, recognising they are fixed in location, and need to remain available for future generations.</li> <li>Mineral processing do occur in rural areas and must locate there because of the presence of the mineral resource. The effects of mineral processing activities must be properly managed in the rural environment.</li> <li>A sustained supply of minerals and aggregate is essential for the continued development of the region and wider New Zealand. Locally</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>sourced low cost minerals and aggregate reduce infrastructure costs and construction projects, and is important to economic wellbeing.</p> <ul style="list-style-type: none"> <li>• This requires finding new sources to meet demand well in the future. This is consistent with the RMA S7(b) matter of "efficient use and development of physical and natural resources".</li> <li>• Under the RMA, economic wellbeing considerations are intertwined with the concept of sustainable management of natural and physical resources.</li> </ul>
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Support	Retain as notified.	<ul style="list-style-type: none"> <li>• Promotes sustainable management, achieves the purpose of the RMA and is not contrary to Part 2 and other provisions of the RMA.</li> <li>• Will enable the social, economic and cultural wellbeing of the community.</li> <li>• Will meet the reasonably foreseeable needs of future generations.</li> <li>• Is the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.</li> </ul>
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Support	Retain as notified.	<ul style="list-style-type: none"> <li>• Promotes sustainable management, achieves the purpose of the RMA and is not contrary to Part 2 and other provisions of the RMA.</li> <li>• Will enable the social, economic and cultural wellbeing of the community.</li> <li>• Will meet the reasonably foreseeable needs of future generations.</li> <li>• Is the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.</li> </ul>
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for economic production	Support	Retain as notified.	<ul style="list-style-type: none"> <li>• Promotes sustainable management, achieves the purpose of the RMA and is not contrary to Part 2 and other provisions of the RMA.</li> <li>• Will enable the social, economic and cultural wellbeing of the community.</li> <li>• Will meet the reasonably foreseeable needs of future generations.</li> <li>• Is the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.</li> </ul>
154	Land management for economic production	Policy suite 4.3 - Sufficient land is managed and protected for economic production	Amend	Insert a new Policy as follows: " <u>Recognise the benefits derived from mineral prospecting, exploration, extraction and processing, particularly their contribution towards social, cultural and economic wellbeing</u> ".	<ul style="list-style-type: none"> <li>• The PRPS does not contain appropriate or sufficient provisions that promote the responsible use of minerals, recognising they are fixed in location, and need to remain available for future generations.</li> <li>• A sustained supply of minerals and aggregate is essential for the continued development of the region and wider New Zealand. Locally sourced low cost minerals and aggregate reduce infrastructure costs and development projects, and is important to economic wellbeing.</li> <li>• This requires finding new sources to meet demand well in the future. This is consistent with the RMA S7(b) matter of "efficient use and development of physical and natural resources".</li> <li>• Under the RMA, economic wellbeing considerations are intertwined with the concept of sustainable management of natural and physical resources.</li> </ul>
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend Policy 4.3.6 as follows: "Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) Giving preference <u>where possible</u> , to avoiding their location in: [i. to v. unchanged]; and b) <del>Restricting</del> <u>Avoiding</u> the establishment of those activities in <u>or adjacent to</u> areas used for mineral and gas exploration, extraction and processing <u>or in areas containing or adjacent to</u>	<ul style="list-style-type: none"> <li>• The policy does not give effect to the RMA. It will not enable the social, economic and cultural wellbeing of the community, and will not sustain the potential of the physical resource represented by the submitter's assets in the region for the future.</li> <li>• It is not adequate to protect and enable the submitter's operations in the region and does not have sufficient regard to the efficient use and development of the submitters' assets and of those resources which are dependent on, or benefit from, the submitters' assets and operations.</li> <li>• A sustained supply of minerals and aggregate is essential for the continued development of the region and wider New Zealand. Locally</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><u>regionally significant mineral resources</u> that may result in reverse sensitivity effects <u>or compromise future mineral extraction and processing activities.</u></p> <p><u>c) Identify mineral deposits for future use and safeguarding the regionally significant ones from inappropriate land use, subdivision and development.</u></p> <p><u>d) Enable industries that principally use the products of mineral extraction activities to co-locate in, or adjoining, land containing mineral extraction activities or mineral resources."</u></p>	<p>sourced low cost minerals and aggregate reduce infrastructure costs and development projects, and is important to economic wellbeing.</p> <ul style="list-style-type: none"> <li>• This requires finding new sources to meet demand well in the future. This is consistent with the RMA S7(b) matter of "efficient use and development of physical and natural resources".</li> <li>• Under the RMA, economic wellbeing considerations are intertwined with the concept of sustainable management of natural and physical resources.</li> <li>• The Policy is not the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.</li> </ul>
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	<p>Amend Policy as follows: "Minimise <u>significant</u> adverse effects from the exploration, extraction and processing of minerals, by:</p> <p>a) Giving preference to avoiding their location in...:</p> <p><del>v. Areas subject to significant natural hazard risk</del></p> <p>...</p> <p>f) Reducing unavoidable adverse effects <u>where practicable</u>, by:</p> <p>i. Staging development for longer term activities <del>and</del> <u>or</u></p> <p>ii. Progressively rehabilitating the site where possible <del>and</del> <u>or</u></p> <p><u>iii. Preparing management and mitigation plans.</u></p> <p>g) Considering the use of offsetting, or compensatory measure for residual adverse effects <del>and</del></p> <p><del>h) Applying a precautionary approach to assessing the effects of the activity, where there is scientific uncertainty, and potentially significant or irreversible adverse effects."</del></p>	<ul style="list-style-type: none"> <li>• The policy does not give effect to the RMA. It will not enable the social, economic and cultural wellbeing of the community, and will not sustain the potential of the physical resource represented by the submitter's assets in the region for the future.</li> <li>• It is not adequate to protect and enable the submitter's operations in the region and does not have sufficient regard to the efficient use and development of the submitters' assets and of those resources which are dependent on, or benefit from, the submitters' assets and operations.</li> <li>• A sustained supply of minerals and aggregate is essential for the continued development of the region and wider New Zealand. Locally sourced low cost minerals and aggregate reduce infrastructure costs and development projects, and is important to economic wellbeing.</li> <li>• This requires finding new sources to meet demand well in the future. This is consistent with the RMA S7(b) matter of "efficient use and development of physical and natural resources".</li> <li>• Under the RMA, economic wellbeing considerations are intertwined with the concept of sustainable management of natural and physical resources.</li> <li>• The Policy is not the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	<p>Amend the policy as follows: "Enable offsetting of adverse effects on indigenous biodiversity values, <del>only</del> when:</p> <p>a) The activities causing those effects have a functional necessity to locate in significant or outstanding areas; <del>and/or</del></p> <p><u>aa) The activities causing those effects are regionally or nationally significant; and ..."</u></p>	<ul style="list-style-type: none"> <li>• The policy does not give effect to the RMA. It will not enable the social, economic and cultural wellbeing of the community, and will not sustain the potential of the physical resource represented by the submitter's assets in the region for the future.</li> <li>• It is not adequate to protect and enable the submitter's operations in the region and does not have sufficient regard to the efficient use and development of the submitters' assets and of those resources which are dependent on, or benefit from, the submitters' assets and operations.</li> <li>• A sustained supply of minerals and aggregate is essential for the continued development of the region and wider New Zealand. Locally sourced low cost minerals and aggregate reduce infrastructure costs and development projects, and is important to economic wellbeing.</li> <li>• This requires finding new sources to meet demand well in the future. This is consistent with the RMA S7(b) matter of "efficient use and development of physical and natural resources".</li> <li>• Under the RMA, economic wellbeing considerations are intertwined with the concept of sustainable management of natural and physical resources.</li> <li>• The Policy is not the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Amend (a) as follows: "a) The offset achieves no net loss and <u>where possible</u> , preferably a net gain in indigenous biodiversity values; and"	<p>provisions relative to other means.</p> <ul style="list-style-type: none"> <li>• The policy does not give effect to the RMA. It will not enable the social, economic and cultural wellbeing of the community, and will not sustain the potential of the physical resource represented by the submitter's assets in the region for the future.</li> <li>• It is not adequate to protect and enable the submitter's operations in the region and does not have sufficient regard to the efficient use and development of the submitters' assets and of those resources which are dependent on, or benefit from, the submitters' assets and operations.</li> <li>• A sustained supply of minerals and aggregate is essential for the continued development of the region and wider New Zealand. Locally sourced low cost minerals and aggregate reduce infrastructure costs and development projects, and is important to economic wellbeing.</li> <li>• This requires finding new sources to meet demand well in the future. This is consistent with the RMA S7(b) matter of "efficient use and development of physical and natural resources".</li> <li>• Under the RMA, economic wellbeing considerations are intertwined with the concept of sustainable management of natural and physical resources.</li> <li>• The Policy is not the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.</li> </ul>
192	Method 4 - City and District Plans	Method 4 - City and District Plans	Amend	Amend to require Councils to: <ul style="list-style-type: none"> <li>• Identify regionally significant mineral resources and mineral extraction activities to be protected from reverse sensitivity effects; and</li> <li>• Apply buffers and setbacks to regionally significant mineral resources and mineral extraction activities to avoid reverse sensitivity effects.</li> </ul>	<ul style="list-style-type: none"> <li>• The PRPS does not contain appropriate or sufficient provisions that promote the responsible use of minerals, recognising they are fixed in location, and need to remain available for future generations.</li> <li>• A sustained supply of minerals and aggregate is essential for the continued development of the region and wider New Zealand. Locally sourced low cost minerals and aggregate reduce infrastructure costs and development projects, and is important to economic wellbeing.</li> <li>• This requires finding new sources to meet demand well in the future. This is consistent with the RMA S7(b) matter of "efficient use and development of physical and natural resources".</li> <li>• Under the RMA, economic wellbeing considerations are intertwined with the concept of sustainable management of natural and physical resources.</li> </ul>
252	Other comments	Process	Not Applicable	The Council should undertake alternative dispute resolution procedures prior to the hearings.	The issues underpinning this submission can be better resolved without the need to rely on substantial participation in the formal hearing process.
258	Other comments	Consequential amendments & other amendments providing relief	Amend	Any other consequential relief to the RPS, including but not limited to, the maps, issues, objectives, policies and explanations that will fully give effect to the matters raised in this submission.	There may be other methods or relief that are able to address the submitters concerns, and the suggested revisions do not limit the generality of the reasons for this submission.
294	Objectives on use and enjoyment of natural and built environment	Need 4.3	Support	Retain the "need" statement associated to Objective 4.3 and the introduction to Objective 4.3 (page 82) as notified.	<ul style="list-style-type: none"> <li>• Promotes sustainable management, achieves the purpose of the RMA and is not contrary to Part 2 and other provisions of the RMA.</li> <li>• Will enable the social, economic and cultural wellbeing of the community.</li> <li>• Will meet the reasonably foreseeable needs of future generations.</li> <li>• Is the most appropriate means of exercising Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.</li> </ul>

### 113 Waitaki Irrigators Collective Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Reconsider the use of the word "avoid" throughout the PRPS.	<ul style="list-style-type: none"> <li>Many of the policies may be more restrictive than was (perhaps) intended.</li> <li>Allow decision-makers some discretion to consider the merits and effects of particular activities and proposals on a case-by-case basis.</li> </ul>
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend to include wording such as "where appropriate and practicable".	<ul style="list-style-type: none"> <li>Although the intent of the policy is supported, there may be instances where it is not possible or practicable for a resource in a particular site to support a customary use or values associated with it.</li> <li>There is little guidance as to how conflicting uses and values are to be resolved.</li> </ul>
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend to include wording such as "where appropriate and practicable".	<ul style="list-style-type: none"> <li>Although the intent of the policy is supported, there may be instances where it is not possible or practicable for a resource in a particular site to support a customary use or values associated with it.</li> <li>There is little guidance as to how conflicting uses and values are to be resolved.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Addition of the following words: "h) <u>where appropriate</u> maintain or enhance the natural functioning..." "g) <u>support and provide for primary production values.</u> "	<ul style="list-style-type: none"> <li>Some waterbodies have already been significantly modified, and returning them to their natural state may come at significant cost to the community, and may be undesirable.</li> <li>The use of freshwater for primary production contributes to the social and economic wellbeing.</li> <li>Primary production is recognised as a value in relation to soils, and the same should apply to freshwater.</li> <li>Support clause (p).</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Addition of the following words: "f) <u>where appropriate</u> maintain or enhance the natural character..."	Some waterbodies have already been significantly modified, and returning them to their natural state may come at significant cost to the community, and may be undesirable.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Support	Support.	Supports the inclusion of primary production values in relation to soils.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend the wording "recognise the natural and physical environmental constraints of an area, the effects of those constraints on activities, and the effects of those activities on those constraints..."	Very difficult to understand as currently written. It should be amended to aid understanding.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Support	Support in part.	Supports the recognition of the functional needs of infrastructure of regional or national importance, provided that irrigation infrastructure is included in this category.
103	Infrastructure of national or regional significance	Policy suite 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Recognise the national and regional importance of irrigation infrastructure within this suite of policies.	<ul style="list-style-type: none"> <li>Irrigation infrastructure is of national and regional importance: <ul style="list-style-type: none"> <li>Irrigation contributes significantly to the economic and social wellbeing of Otago and New Zealand.</li> <li>The national significance of irrigation infrastructure has been recognised by central government through the inclusion of "productive water" infrastructure in the National Infrastructure Unit's 2015 planning processes.</li> </ul> </li> </ul>
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Addition of the following words: "Recognising national and regional significance of infrastructure... f) structures for transport by rail; <u>and</u> g) <u>irrigation water infrastructure.</u> "	<ul style="list-style-type: none"> <li>Irrigation infrastructure is of national and regional importance: <ul style="list-style-type: none"> <li>Irrigation contributes significantly to the economic and social wellbeing of Otago and New Zealand.</li> <li>The national significance of irrigation infrastructure has been recognised by central government through the inclusion of "productive water" infrastructure in the National Infrastructure Unit's 2015 planning processes.</li> </ul> </li> </ul>
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	Insert the following: "d) ... Schedule 3; <u>provided that</u> <u>e) any adverse effects on other industries are avoided, or where this is not practicable, remedied or mitigated.</u> "	<ul style="list-style-type: none"> <li>Inappropriate to elevate the status of hydro-electricity generation over other uses of freshwater.</li> <li>This policy could have significant impacts on other resource users: the operation of hydro-generation facilities will necessarily impact those industries that operate downstream of the generation</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	Amend b) and c) as follows: "b) <u>where appropriate, give preference to</u> the development or upgrade of infrastructure ... c) Encouraging collective coordination and <u>collaborative catchment management processes, rationing of take and use of water when river flows or aquifer levels are lowering, to avoid breaching minimum flow or aquifer level restriction; and...</u> "	infrastructure. • Current policy wording does not recognise that: • Some water distribution and use infrastructure are already highly efficient; • The replacement of some energy-passive infrastructure could reduce energy efficiency, which is contrary to Objective 3.6; • Increasing the efficiency of some water distribution infrastructure can have unintended consequences such as reducing groundwater recharge through increased conveyance efficiency; • It could conflict with Policy 2.1.1(p). • (c) does not allow for consideration of collaborative methods for managing water beyond "rationing", and it only applies to times when river or aquifer levels are "lowering".
212	Method 8 - Education and Information	Method 8.1.2 - Information from regional council - compulsory	Amend	Include a method that the Council will provide guidance on measures to maintain or enhance water quality, especially in relation to meeting limits.	The Council should play a proactive role in supporting land users to meet water quality limits.
224	Method 11 - Advocacy and Facilitation	Method 11.2.2 - Facilitation by regional council - compulsory	Amend	Include a method that promotes the facilitation of collaborative, community-led processes for the integrated management of land and water resources at the catchment scale.	Methods (i) and (ii) only apply to water management groups that coordinate the exercise of water-related consents, and water allocation committees for the management of water allocation in times of drought. It can be desirable to include a wider range of stakeholders in water and land management processes at the catchment-scale at other times and in other circumstances.
225	Method 11 - Advocacy and Facilitation	Method 11.2.3 - Facilitation by regional, city and district councils - optional	Amend	Amend the wording of the Method as follows: "a) facilitate the planning of community infrastructure, <del>when it would increase the efficiency of water use; ...</del> "	• The method as currently drafted is too narrow. • Council should (where appropriate) facilitate the planning of community infrastructure without it necessarily being linked to increased water use efficiency.
230	Anticipated Environmental Results	AER 2.2 - Otago's water bodies support healthy ecosystems, are safe for swimming, and maintain their natural form and character	Amend	Amend the indicator in relation to wetlands to include a significance threshold.	• The inventory of all wetlands would be extremely time-consuming and expensive. • This would also apply to constructed wetlands on private land. • Would be consistent with the Council's Water Plan for Otago.

#### 114 Wise Response Society Inc.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Give the Plan a global as well as a national context.	The plan should take into account the global context to give "sustainable management" a fully integrated and defensible bio-physical foundation (e.g. future constraints on fossil fuels, climate change).
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Require the setting of limits to resource use and discharges that will be ecologically sustainable into the future, across resources, and include mechanisms that will ensure those limits will not be breached.	This implies effective monitoring and accounting.
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	• Shift the focus of activity away from promoting economic development and financial return to sustainably managing of the natural and physical resources, as required under RMA S5. • Build region-wide and integrated resilience.	• Our footprint is already above what is sustainable or fair in global terms: the concepts of "resilience" and "development" are more appropriate terms than increasing "prosperity" and "growth". • Regional Authorities' primary responsibility is to control the adverse effects of economic activity on the environment, in the public interest. Promoting economic activity creates a conflict of interest and undermines trust in Council's activities. • The value of particular economic activities can change. • This requires integration across land, freshwater, estuarine and marine interfaces as a single ecosystem complex to be optimised and sustainable.
3	Overall approach	Whole Regional Policy Statement	Amend	Securing the environment and biodiversity	• The flavour of many of the policies in the Plan needs amending to be

Ref	Issue	Provision (overall approach)	Position	Decision Requested	Reason for Decision Requested
				before considering economic development needs must be reflected in the wording and ranking of policies.	less anthropocentric. <ul style="list-style-type: none"> <li>Regional and District Councils have a responsibility to maintain indigenous biodiversity and to provide for the protection of significant indigenous vegetation and significant habitats of indigenous fauna, and also provide for the preservation of the natural character of the coastal environment, wetlands, rivers, lakes and their margins.</li> </ul>
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Promote agro-ecological resilience at scale as a way to address a range of issues and needs.	<ul style="list-style-type: none"> <li>Need for a more proactive approach to defining sustainable land use activities by zone, taking into account ecosystem services and amenity.</li> <li>Adopt the concept of "integrated landscape management" (agroecology) as a practical method of shoreing up both rural and urban resilience, and also identifying activities appropriate for different zones.</li> <li>The mai uses that make up the landscapes can be integrated to enhance the productive potential of the overall system. There are massive potential gains to individual property owners and the community from planning at such a level.</li> </ul>
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Achieve sustainable resource management throughout Otago, not just where resources are identified as being "significant" or "highly valued".	<ul style="list-style-type: none"> <li>Fragmented habitats are not sustainable, and ecosystem components cannot be managed in isolation.</li> <li>Sustainable management and ecosystem protection must be a cornerstone of practice right across the region if our region is to have a strong future.</li> </ul>
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Add more specific reference to the precautionary principle.	Applaud the inclusion of a precautionary approach in the Plan.
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	Amend 3rd paragraph as follows: "Cumulative <u>adverse</u> effects of human activities on the environment may be difficult to pinpoint initially, but over time <u>will cause serious damage</u> <u>may have serious implications.</u> "	<ul style="list-style-type: none"> <li>Strongly agree with the first two paragraphs of the issue statement.</li> <li>Wording in the Plan needs to be clear and uncompromising. Suggested wording change gives the plan more teeth.</li> </ul>
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend as follows: "Otago has a distinct range of outstanding natural features, landscapes, seascapes, indigenous biodiversity, water bodies and soil which have intrinsic value and help to create the region's identity and support the <del>region</del> <u>people's</u> wellbeing. These highly valued <u>parts of the environment</u> <del>resources</del> risk becoming degraded if they are not adequately protected. In turn, <u>environmental resource</u> degradation reduces the attractions Otago can offer to tourists, residents and businesses, and could lead to wider adverse economic impacts."	Prefer using the word "environment" as meeting sustainability criteria demands that we maintain the entire environment and don't start picking or choosing on the basis of current values or economic drivers.
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <u>Natural Ecosystems</u> are interconnected, complex and <u>may be easily disrupted or destroyed</u> <del>difficult to manage in a consistent and effective way.</del> Sometimes, the use of one <u>part of the environment resource</u> adversely affects the <u>function value</u> of another. <u>Management may be required to minimise such risk and promote complementarity...</u> "	Wording in the Plan needs to be clear and uncompromising. Suggested wording change gives the plan more teeth.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or	Amend	Amend as follows: " <u>Otago's ecosystems, including their natural and physical resources are recognised, protected and enhanced to</u>	<ul style="list-style-type: none"> <li>The concept of absolute limit, as introduced by the NPS for freshwater, needs to be extended to other resources.</li> <li>Wording in the Plan needs to be clear and uncompromising.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		enhanced		<del>meet as a minimum, system-wide sustainability criteria</del> The values of Otago's natural and physical resources are recognised, maintained and enhanced."	Suggested wording change gives the plan more teeth.
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Change the order of policies (as displayed in the table p. 26) as follows: <ul style="list-style-type: none"> <li>• Ecosystems and indigenous biodiversity: Policy 2.1.1 Managing for ecosystem and indigenous biodiversity value;</li> <li>• Geomorphology &amp; landscape: Policy 2.1.2 Recognising the values of natural features, landscapes and seascapes;</li> <li>• Coastal environment: Policy 2.1.3 Managing the value of the coastal environment, its conservation, sustainability of fisheries and natural character;</li> <li>• Soil: Policy 2.1.4 Managing for soil value</li> <li>• Water: <ul style="list-style-type: none"> <li>• Policy 2.1.5 Managing for freshwater ecosystem function and values;</li> <li>• Policy 2.1.6 Managing of beds of rivers and lakes, wetlands, and their margins for ecosystem function and value;</li> <li>• Policy 2.1.7 Managing coastal water for ecosystem function and value;</li> </ul> </li> <li>• Air and pollution: Policy 2.1.8 Managing air quality and pollution for ecosystem function and value.</li> </ul>	To reflect that the baseline considerations are for a healthy ecosystem on which a healthy socio-economic system can exist.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend as follows: "Policy 2.1.1 <u>Managing for freshwater ecosystem function and value</u> <del>Managing for freshwater values</del> Recognise freshwater values, and manage freshwater, to: a) <u>Protect and sustain</u> <del>Support</del> healthy ecosystems <u>function and restore degraded ecosystems</u> in all Otago aquifers, and rivers, lakes, wetlands, and their margins; and b) <u>Enhance hydrological systems and services, by actively promoting land management that retains and improves moisture capture, natural infiltration, soil moisture holding capacity and deep percolation; and</u> b)c) <u>Sus</u> Retain the range and extent of habitats provided by freshwater; and e)d) <u>Provide additional protection to significant and</u> <del>Protect</del> outstanding water bodies and wetlands; and e)e) <u>Protect</u> migratory patterns of freshwater species, unless detrimental to indigenous biodiversity; and e)f) Avoid aquifer compaction, and seawater intrusion in aquifers <u>by maintaining appropriate potentiometric head</u> ; and f)g) <u>Achieve</u> <del>Maintain</del> good water quality <u>that supports sustainable ecological function,</u>	<ul style="list-style-type: none"> <li>• Suggested b) provides for retainment of infiltration to groundwater beneath urban areas.</li> <li>• Change to p) provides a global context (climate change).</li> <li>• Wording in the Plan needs to be clear and uncompromising. Suggested changes give the plan more teeth by including sustainability indicator.</li> <li>• Need to optimise integration across land, freshwater, estuarine and marine interfaces as a single ecosystem complex.</li> <li>• The flavour of policies need to be less anthropocentric: ultimately, we are not in control and the values that we place on ecosystems etc. must be values that are important in ecological terms.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				including in the coastal marine area, <u>and</u> enhance it where it has been degraded; and ... <del>h)j)</del> Retain <u>and aim to improve</u> the quality and reliability of <u>raw water</u> for existing drinking water supplies; and ... <del>h)m)</del> Protect <u>important</u> recreation values <u>including the ability to swim and gather food</u> ; and ... <del>m)n)</del> Maintain the aesthetic and landscape values of rivers, lakes, and wetlands; and ... <del>o)p)</del> Where possible avoid otherwise <del>m</del> Mitigate the adverse effects of natural hazards, including flooding and erosion; and <del>p)q)</del> Maintain the ability of existing infrastructure to operate within their design parameters <u>and promote upgrades or permit new infrastructure that meets forecast impacts of climate change in time.</u>	
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend as follows: "Policy 2.1.2 <u>Managing of beds of rivers and lakes, wetlands, and their margins for ecosystem function and value</u> <del>Managing for the values of beds of rivers and lakes, wetlands, and their margins</del> Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ... b) <u>Provide additional protection to significant and</u> <del>Protect</del> outstanding water bodies and wetlands; and c) <u>Achieve water quality that supports sustainable ecological function</u> <del>Maintain good water quality, or</del> <u>and</u> enhance it where it has been degraded; and d) <u>Achieve</u> <del>Maintain</del> ecosystem health and <u>enhance</u> indigenous biodiversity; and ... k) <u>Where possible avoid otherwise</u> <del>m</del> Mitigate the adverse effects of natural hazards, including flooding and erosion; and l) <u>Maintain river bank stability where this will result in unnatural sedimentation or endanger land and property.</u>	<ul style="list-style-type: none"> <li>• Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> <li>• Need to optimise integration across land, freshwater, estuarine and marine interfaces as a single ecosystem complex.</li> <li>• The flavour of policies need to be less anthropocentric: ultimately, we are not in control and the values that we place on ecosystems etc. must be values that are important in ecological terms.</li> <li>• The concept to set an absolute limit, and to set mechanisms that ensure those limits will not be breached, should apply across resources: the plan is first and foremost about securing the environment against adverse impacts of human activities.</li> </ul>
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend as follows: "Policy 2.1.3 <u>Managing coastal water for ecosystem function and value</u> <del>Managing for coastal water values</del> Recognise coastal water <u>and estuary value and its connected s,</u> and manage coastal water, to: a) <u>Promote</u> <del>Support</del> healthy coastal ecosystems; and ...	<ul style="list-style-type: none"> <li>• Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> <li>• Need to optimise integration across land, freshwater, estuarine and marine interfaces as a single ecosystem complex.</li> <li>• The flavour of policies need to be less anthropocentric: ultimately, we are not in control and the values that we place on ecosystems etc. must be values that are important in ecological terms.</li> <li>• The concept to set an absolute limit, and to set mechanisms that ensure those limits will not be breached, should apply across</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				d) <del>Achieve water quality that supports sustainable ecological function</del> <u>Maintain and</u> coastal water quality, or enhance it where it has been degraded; and ... h) <del>Protect important recreation values; and...</del>	resources: the plan is first and foremost about securing the environment against adverse impacts of human activities.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend as follows: "Policy 2.1.4 <u>Managing air quality for ecosystem function and value</u> <del>Managing for air quality values</del> "	<ul style="list-style-type: none"> <li>• Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> <li>• The flavour of policies need to be less anthropocentric: ultimately, we are not in control and the values that we place on ecosystems etc. must be values that are important in ecological terms.</li> </ul>
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend as follows: "Policy 2.1.5 <u>Managing soil for ecosystem function and value</u> <del>Managing for soil values</del> Recognise soil values, and manage soils, to: a) <u>Sustain and enhance</u> <del>Maintain</del> their life supporting capacity <u>biological activity soil biodiversity</u> ; and b) <u>Maintain soil biodiversity</u> ; and c) <u>Maintain biological activity in soils</u> ; and d) <u>Sustain and enhance</u> <del>Maintain</del> soil's functions in the storage and cycling of water, nutrients, and other elements through the biosphere; and e) <u>Sustain and enhance</u> <del>Maintain</del> soil's function as a buffer or filter for pollutants resulting from human activities, including aquifers at risk of leachate contamination; and f) <u>Actively promote soil conservation</u> <del>Retain soil resources for primary production</del> ; and..."	<ul style="list-style-type: none"> <li>• Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> <li>• Need to optimise integration across land, freshwater, estuarine and marine interfaces as a single ecosystem complex.</li> <li>• The flavour of policies need to be less anthropocentric: ultimately, we are not in control and the values that we place on ecosystems etc. must be values that are important in ecological terms.</li> <li>• Shift the focus of activity away from promoting economic development and financial return to sustainably managing natural and physical resources.</li> <li>• A healthy "land base" is an essential platform for a healthy society and economy.</li> <li>• The concept to set an absolute limit, and to set mechanisms that ensure those limits will not be breached, should apply across resources: the plan is first and foremost about securing the environment against adverse impacts of human activities.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend as follows: "Policy 2.1.6 <u>Managing for ecosystem and indigenous biodiversity values</u> Recognise <u>and manage</u> the values of ecosystems and indigenous biodiversity, <u>and manage ecosystems and indigenous biodiversity</u> , to: a) <u>Sustain and enhance</u> <del>land, estuarine and marine</del> ecosystem health and indigenous biodiversity; and b) <u>Sustain and enhance</u> areas of predominantly indigenous vegetation; and c) Buffer <u>and</u> link existing ecosystems for <u>greater system-wide resilience</u> ; and d) <u>Enhance</u> <del>Protect important</del> hydrological <u>system</u> <del>services</del> , including the services provided by tussock grassland; and e) Protect natural resources and processes that support indigenous biodiversity; and f) Maintain habitats of indigenous species <u>that are important</u> for recreational, commercial, cultural or customary purposes; and ..."	<ul style="list-style-type: none"> <li>• Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> <li>• Need to optimise integration across land, freshwater, estuarine and marine interfaces as a single ecosystem complex.</li> <li>• The flavour of policies need to be less anthropocentric: ultimately, we are not in control and the values that we place on ecosystems etc. must be values that are important in ecological terms.</li> <li>• The concept to set an absolute limit, and to set mechanisms that ensure those limits will not be breached, should apply across resources: the plan is first and foremost about securing the environment against adverse impacts of human activities.</li> </ul>
39	Natural resource value management - general	Policy 2.1.8 - Recognising the values of natural character in the coastal environment	Amend	Amend as follows: "Policy 2.1.8 <u>Managing the value of the coastal environment, its conservation, sustainability of</u>	<ul style="list-style-type: none"> <li>• Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> <li>• Need to optimise integration across land, freshwater, estuarine and</li> </ul>

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				<p><del>fisheries and natural character</del>Recognising the values of natural character in the coastal environment</p> <p>Recognise the values of <u>the coastal environment, its conservation, sustainability of fisheries and natural character</u> in the coastal environment are derived from the following attributes <u>and manage the land and coastal environment to sustain or enhance these qualities:</u></p> <p>a) <u>Sustainable, functioning estuarine and marine ecosystems that are sustainable</u>  b) <u>Fish stocks that support a viable commercial fishery and valuable recreational fishery</u>  c) <u>Natural elements, processes and patterns;</u>  b)d) <u>Biophysical, ecological, geological and geomorphological aspects;</u>  e)e) <u>Natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, estuaries, reefs, freshwater springs and surf breaks;</u>  f)f) <u>The natural movement of water and sediment;</u>  b)d) <u>The natural darkness of the night sky;</u>  f)h) <u>Pristine or highly natural pPlaces or areas that are wild or scenic and not spoilt by built structures or inappropriate activity ;</u>  g) <u>A range of natural character from pristine to modified;</u>  h)j) <u>Experiential attributes, including the sounds and smell of the sea; and their context or setting."</u></p>	<p>marine interfaces as a single ecosystem complex.</p> <ul style="list-style-type: none"> <li>• The flavour of policies need to be less anthropocentric: ultimately, we are not in control and the values that we place on ecosystems etc. must be values that are important in ecological terms.</li> <li>• The concept to set an absolute limit, and to set mechanisms that ensure those limits will not be breached, should apply across resources: the plan is first and foremost about securing the environment against adverse impacts of human activities.</li> </ul>
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Amend	Amend as follows: " <u>Natural features of Otago's environment with significant or outstanding qualities are identified, protected and enhanced to a standard above general sustainability criteria, so as to maintain their special qualities</u> Otago's significant and highly valued natural resources are identified, and protected or enhanced to maintain their distinctiveness."	<ul style="list-style-type: none"> <li>• To set a baseline driven by sustainability criteria but recognising that some elements in the landscape need a higher level of preservation.</li> <li>• Wording in the Plan needs to be clear and uncompromising. Suggested wording change gives the plan more teeth.</li> </ul>
42	Highly valued natural resources - indigenous biodiversity	Policy 2.2.1 - Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend Policy header as follows: "Policy 2.2.1 Identifying <u>remaining</u> areas of significant indigenous vegetation and significant habitats of indigenous fauna"	<ul style="list-style-type: none"> <li>• It is important to acknowledge that we have already lost a lot and so are dealing with the remaining elements of significant landscape, wetland, pristine water etc.</li> <li>• Wording in the Plan needs to be clear and uncompromising. Suggested wording change gives the plan more teeth.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: "Policy 2.2.2 <u>Protect and enhance remaining significant indigenous vegetation and significant habitats of indigenous fauna</u> Managing significant indigenous vegetation and significant habitats of indigenous fauna Protect and enhance <u>to a standard above sustainable resource management</u> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) <u>Avoiding activities with a significant risk of adverse effects on those values which</u>	<ul style="list-style-type: none"> <li>• It is important to acknowledge that we have already lost a lot and so are dealing with the remaining elements of significant landscape, wetland, pristine water etc.</li> <li>• Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> <li>• Wish to see specific reference to the precautionary approach, as precaution must prevail where there is scientific uncertainty.</li> <li>• Council need to actively inform the general public and explain how citizens can aid the process of sustainable management.</li> </ul>



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				contribute to the area or habitat being significant; and b) <del>Prohibit</del> Avoiding significant adverse effects on other values of the area or habitat; and c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and d) Remediating, when adverse effects cannot be <del>or have not been</del> avoided; and e) Mitigating where adverse effects cannot be <del>or have not been</del> avoided or remediated; and f) <u>Actively promoting and supporting</u> Encouraging enhancement of those areas and values."	
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Policy 2.2.4 <u>Protect and enhance significant and outstanding natural features, landscapes and seascapes</u> Managing outstanding natural features, landscapes, and seascapes Protect, enhance and restore to a <u>standard above sustainable resource management</u> the values of <u>significant and</u> outstanding natural features, landscapes and seascapes, by: a) Avoiding <u>activities with a risk of</u> adverse effects on those values which contribute to the significance of the natural feature, landscape or seascape; and b) Avoiding, remedying or mitigating other adverse effects on other values <u>affecting the same locality</u> ; and c) <u>Encouraging enhancement of those areas</u> e)d) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and d)e) Recognising and providing for positive contributions of existing introduced species to those values; and e)f) Controlling the adverse effects of pest species, preventing their introduction and reducing their spread; and f) <del>Encouraging enhancement of those areas and values.</del> "	<ul style="list-style-type: none"> <li>• Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> <li>• Wish to see specific reference to the precautionary approach, as precaution must prevail where there is scientific uncertainty.</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend Policy header as follows: "Policy 2.2.5 Identifying <u>remaining</u> special amenity landscapes and highly valued natural features"	<ul style="list-style-type: none"> <li>• It is important to acknowledge that we have already lost a lot and so are dealing with the remaining elements of significant landscape, wetland, pristine water etc.</li> <li>• Wording in the Plan needs to be clear and uncompromising. Suggested wording change gives the plan more teeth.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Policy 2.2.6 <u>Protect and enhance remaining special amenity landscapes and highly valued natural features</u> Managing special amenity landscapes and highly valued natural features Protect or enhance to a <u>standard above sustainable resource management</u> the values of <u>remaining</u> special amenity landscapes and highly valued natural features, by:..."	<ul style="list-style-type: none"> <li>• It is important to acknowledge that we have already lost a lot and so are dealing with the remaining elements of significant landscape, wetland, pristine water etc.</li> <li>• Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> </ul>
49	Highly valued natural resources -	Policy 2.2.7 - Identifying the	Amend	• Amend c) as follows: "c) Any landscapes or	<ul style="list-style-type: none"> <li>• Wording in the Plan needs to be clear and uncompromising.</li> </ul>

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	the coastal environment	landward extent of the coastal environment		features, including coastal escarpment <u>and</u> <u>ridgelines</u> , which contribute to the natural character, visual quality or amenity values of the coast; and". • Add criteria if the policy has implications for the extent of jurisdiction for the National and regional plans.	Suggested wording changes give the plan more teeth. • May be a need to add other criteria if Policy 2.2.7 has implications for the extent of jurisdiction for the National and regional plans.
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend as follows: "Policy 2.2.9 <u>Protect and enhance the natural character of the coastal environment and afford additional protection to significant and outstanding areas</u> Managing the natural character of the coastal environment Preserve or enhance <u>to a standard above sustainable resource management</u> the natural character values of the coastal environment, by: a) <u>Prohibiting activities with</u> Avoiding adverse effects on those values which contribute to the outstanding natural character of an area; and b) Avoiding significant adverse effects on those values which contribute to the high natural character values of an area; and c) <u>Encouraging enhancement of those values;</u> and d) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and e) Avoiding, remedying or mitigating other adverse effects on other values <u>affecting the same locality;</u> and f) Recognising and providing for the contribution of existing introduced species to the natural character of the coastal environment; and g) <u>Encouraging enhancement of those values;</u> and h) Controlling the adverse effects of pest species, prevent their introduction and reduce their spread."	Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend as follows: "Policy 2.2.13 <u>Protect and enhance outstanding water bodies and wetlands</u> Managing outstanding water bodies and wetlands Protect the values of outstanding water bodies and wetlands <u>to a standard above sustainable resource management</u> by: a) Avoiding <u>activities with risk of</u> significant adverse effects, including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and ... e) <u>Promoting</u> Encouraging enhancement of outstanding water bodies and wetlands."	• Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth. • Wish to see specific reference to the precautionary approach, as precaution must prevail where there is scientific uncertainty. • Council need to actively inform the general public and explain how citizens can aid the process of sustainable management.
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued soil	• Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.

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				resources Identify areas and values of highly valued soil resources, using the following criteria: ... e) <u>Susceptibility to damage or erosion.</u> "	<ul style="list-style-type: none"> <li>It is important the Plan reflects that a healthy "land base" is ultimately a essential platform for a healthy society and economy.</li> </ul>
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Amend as follows: "Policy 2.2.15 Managing highly valued soil resources Protect the values of areas of highly valued soil resources, by: a) Avoiding significant adverse effects on those values which contribute to the soil being highly valued soils; and b) Avoiding, remedying or mitigating other adverse effects on values <u>and availability</u> of those soils; and ... d) <u>Ensuring all practical alternatives have been considered before permitting</u> Recognising that urban expansion may be appropriate due to location and proximity to existing urban development and infrastructure <u>over high value soils.</u> "	<ul style="list-style-type: none"> <li>Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> <li>It is important the Plan reflects that a healthy "land base" is ultimately a essential platform for a healthy society and economy.</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend as follows: " <u>Land and water ecosystem function and value is recognised and sustained throughout the region in accordance with the precautionary principle</u> Natural resource systems and their interdependencies are recognised."	<ul style="list-style-type: none"> <li>Sustainable management requires integration across land, freshwater, estuarine and marine interfaces as a single ecosystem complex to be optimised.</li> <li>Wish to see specific reference to the precautionary approach, as precaution must prevail where there is scientific uncertainty.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	Amend as follows: "Policy 2.3.1 <u>Applying integrated management to all elements of the environment including those identified as resources</u> Applying an integrated management approach among resources Apply an integrated approach to the management of Otago's natural and physical resources, to achieve sustainable management, by: a) Taking into account the impacts of management of one resource on the values of another <u>as elements of the, or on the</u> environment in general; and b) Recognising that the form and function of a resource <u>within an environment</u> may extend beyond the immediate, or directly adjacent, area of interest. c) <u>Ensuring that resource objectives are complementary across administrative boundaries; and</u> d) <u>Ensuring that effects of activities on the whole of a resource are considered when that resource is managed by sub-unit"</u>	<ul style="list-style-type: none"> <li>Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> <li>Sustainable management requires integration across land, freshwater, estuarine and marine interfaces as a single ecosystem complex to be optimised and sustainable.</li> <li>Prefer using the word "environment" as meeting sustainability criteria demands that we maintain the entire environment and don't start picking or choosing on the basis of current values or economic drivers.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete Policy 2.3.2	Proposed amendments to Policy 2.3.1 allow for simplification by eliminating Policy 2.3.2. Reducing the number of provisions makes the Plan more useful and accessible.

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62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Amend	Amend as follows: "Policy 2.3.3 <u>Applying integrated management to freshwater catchments</u> <del>Applying an integrated management approach for freshwater catchments</del> Apply an integrated management approach to activities in freshwater catchments <u>or landscapes</u> , that by: a) <del>Achieve</del> Using consistent freshwater objectives for interconnected water bodies; and b) <del>Recognising</del> the importance of river morphology, catchment hydrology, natural processes and land cover in supporting catchment values <u>and services</u> ; and c) <del>Coordinating</del> the management of land use and freshwater, to: i. <del>Main</del> <u>Sustain</u> <del>and</del> enhance freshwater values; and ii. <del>Main</del> <u>Sustain</u> <del>and</del> enhance the wetland values; and iii. <del>Main</del> <u>Sustain</u> <del>and</del> enhance the values of beds of rivers and lakes, wetlands, and their margins; and iv. Reduce the potential for health and nuisance effects v. <u>Facilitate the achievement of other objectives and policies in this plan.</u>	<ul style="list-style-type: none"> <li>• Amendments result in the policy being more direct.</li> <li>• Sustainable management requires integration across land, freshwater, estuarine and marine interfaces as a single ecosystem complex to be optimised and sustainable.</li> <li>• Adopt the concept of "integrated landscape management" as a practical method of shoring up rural and urban resilience and of identifying activities appropriate for different zones.</li> </ul>
63	Natural systems and interdependencies	Policy 2.3.4 - Applying an integrated management approach for the coastal environment	Amend	Amend as follows: "Policy 2.3.4 <u>Applying integrated management for the coastal environment</u> <del>Applying an integrated management approach for the coastal environment</del> Apply an integrated management approach to activities <u>that impact</u> in the coastal environment, <del>that</del> by: a) <del>Recognising</del> the importance of coastal morphology, coastal processes and land cover in supporting <u>the value and services of the coastal environment and associated marine ecosystems</u> values; and b) <del>Coordinating</del> the management of land use, freshwater, and coastal water, to: i. Maintain or enhance coastal values; and ii. Reduce the potential for health and nuisance effects. iii. <u>Facilitate the achievement of other objectives and policies in this plan.</u> "	<ul style="list-style-type: none"> <li>• Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> <li>• Need to optimise integration across land, freshwater, estuarine and marine interfaces as a single ecosystem complex.</li> </ul>
64	Natural systems and interdependencies	Policy 2.3.5 - Applying an integrated management approach for airsheds	Amend	Amend as follows: "Policy 2.3.5 <u>Applying management to airsheds</u> <del>Applying an integrated management approach for airsheds</del> Apply an integrated management approach to activities that affect air quality, that: a) <del>Setting</del> emission standards for airsheds that take into account foreseeable demographic changes, and their effects on cumulative	Need to optimise integration across land, freshwater, estuarine and marine interfaces as a single ecosystem complex.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				emissions; and b) Co-ordinating the management of land use and air quality, to: i. Maintain or enhance air quality values; and ii. Reduce the potential for adverse health and nuisance effects. <u>iii. Facilitate the achievement of other objectives and policies in this plan.</u>	
66	Objectives on resilience, health and safety	Issue 3.1 - Risk of overreaching the environment's carrying capacity	Amend	Amend as follows: "Activities that are undertaken without regard to their wider local environment, including the global context, are at greater risk of overreaching that environment's ability capacity to sustain the activity."	Suggested wording changes provide for a wider or more global context.
68	Objectives on resilience, health and safety	Issue 3.3 - Effects of climate change	Amend	Amend as follows: "Climate change will is expected to bring higher sea levels and an increased frequency of climate-related natural hazard events, which will increase the risk that Otago's communities face."	<ul style="list-style-type: none"> <li>• Wording in the Plan needs to be clear and uncompromising. Suggested changes to the wording give the plan more teeth.</li> <li>• Climate change is well advanced and the prospects of life as we know it are small if the global average temperature increases by more than 2deg.</li> </ul>
69	Objectives on resilience, health and safety	Issue 3.4 - Importance of adequate infrastructure	Amend	Amend as follows: "Aging and sub-standard, or inadequate infrastructure risks creating safety, health and access problems, and as a consequence, threatens community resilience."	Wording in the Plan needs to be clear and uncompromising. Suggested changes to the wording give the plan more teeth.
72	Objectives on resilience, health and safety	Issue 3.7 - Urban design and people's well-being	Amend	Amend as follows: "In the past, urban development has not always had regard to the local environment, or considered the access and mobility needs for different people or energy efficiency. There are high costs to improve buildings and infrastructure to meet modern standards and new housing is beyond the means of a significant portion of the community."	Suggested wording changes provide a global context: the Plan needs to anticipate and facilitate preparation in the community for energy constraints.
73	Objectives on resilience, health and safety	Issue 3.8 - Risks of inadequately managed urban growth	Amend	Amend last sentence as follows: "Sometimes, unplanned growth places pressure on adjoining productive land, and risks losing connectivity with adjoining urban areas and undermines rural and landscape amenity."	Adopt the concept of "integrated landscape management" as a practical method of shoring up rural and urban resilience and of identifying activities appropriate for different zones.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Objective 3.1 Protection, use and development of natural and physical resources recognises environmental constraints and acts according to the precautionary principle."	Wish to see specific reference to the precautionary approach.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints and limits and acts accordingly Identify/Recognise the natural and physical environmental constraints and limits likely to affect of an area, the likely effects of those constraints on activities, and the likely effects of those activities on those constraints, including: ... d) Exposure of the activity to natural and technological hazards or risks; and..."	<ul style="list-style-type: none"> <li>• Wish to see specific reference to the precautionary approach.</li> <li>• Wording in the Plan needs to be clear and uncompromising. Suggested amendments give the plan more teeth.</li> </ul>
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Policy 3.2.1 Identifying and monitoring natural	Set effective monitoring requirements that include sustainability indicators.

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				hazards Identify natural hazards that may adversely affect Otago's communities, including hazards of low likelihood and high consequence. <u>Monitor the cause, risk and occurrence of natural hazards using appropriate indicators.</u> "	
82	Natural hazard risk	Policy 3.2.2 - Assessing natural hazard likelihood	Amend	Amend d) as follows: "d) Effects of climate change on the hazard;..."	Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Add an additional item as follows: " <u>f) and the effects of the activity on the effects of climate change.</u> "	<ul style="list-style-type: none"> <li>Climate change is well advanced and the prospects of life as we know it are small if the global average temperature increases by more than 2 deg.</li> <li>The Plan needs to find indirect ways to enable and require everyone in the region to contribute to emissions reductions.</li> </ul>
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend as follows: "Reduce existing natural hazard risk, including by: a) <del>Promoting</del> <u>Encouraging</u> activities that: i. Reduce risk; or ii. Reduce community vulnerability; and b) <del>Discouraging</del> activities that <u>are potentially of low impact and prohibit activities which are potentially of high impact when those activities:</u> i. Increase risk; or ii. Increase community vulnerability; and ... e) <u>Relocating or promoting the relocation of</u> lifeline utilities, and facilities for essential and emergency service, to areas of reduced risk, where appropriate and practicable; and f) <u>Enabling development, upgrade, maintenance and operation of lifeline utilities and facilities for essential and emergency services that are sustainable;</u> and g) <u>Re-assessing natural hazard risk, and community tolerance of that risk, following significant natural hazard events and taking these into account in planning decisions.</u>	<ul style="list-style-type: none"> <li>Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> <li>Council need to actively inform the general public and explain how citizens can aid the process of sustainable management.</li> <li>The concept to set an absolute limit, and to set mechanisms that ensure those limits will not be breached, should apply across resources: the plan is first and foremost about securing the environment against adverse impacts of human activities.</li> </ul>
88	Natural hazard risk	Policy 3.2.8 - Applying a precautionary approach	Amend	Amend as follows: "Policy 3.2.8 Applying <del>the</del> a precautionary principle across all policies approach Where natural hazard risk is uncertain or unknown, but potentially significant or irreversible, apply a precautionary principle approach to identifying, assessing and managing that risk. <u>For the purposes of this plan the precautionary principle and approach means that if an action or policy has a suspected risk of causing harm to the public or the environment, in the absence of extensive scientific consensus that the action or policy is not harmful, the burden of proof that it is not harmful falls on those taking action. The principle implies that there is social responsibility to protect the public from exposure to harm, when scientific investigation has found a plausible risk. These protections can be relaxed only if further scientific findings</u>	<ul style="list-style-type: none"> <li>Wish to see specific references to the precautionary principle, where scientific uncertainty exists.</li> <li>Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> </ul>

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				<u>emerge that provide sound evidence that no harm will result.</u> "	
90	Natural hazard risk	Policy 3.2.10 - Mitigating natural hazards	Amend	Amend as follows: "Give preference to risk <u>avoidance or risk minimization</u> management approaches that reduce the need for hard mitigation <u>interventions</u> measures or similar engineering interventions, and provide for hard mitigation <u>intervention</u> measures only when: ... b) There are no reasonable <u>and sustainable</u> alternatives; and ..."	<ul style="list-style-type: none"> <li>Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> <li>The concept to set an absolute limit, and to set mechanisms that ensure those limits will not be breached, should apply across resources: the plan is first and foremost about securing the environment against adverse impacts of human activities.</li> </ul>
92	Objectives on resilience, health and safety	Objective 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Amend	Amend as follows: "Objective 3.3 Otago's communities are prepared for and able to adapt to the effect of <u>physical limits that can not be avoided or mitigated of climate change.</u> "	Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.
93	Climate change	Policy suite 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Amend	Address mitigation, through two additional policies with the following headers: "Identify physical limits that pose risks" and "Actively mitigate those risks that are serious".	<ul style="list-style-type: none"> <li>Climate change is well advanced and the prospects of life as we know it are small if the global average temperature increases by more than 2deg.</li> <li>Only adapting to insidious and ongoing trends that pose a risk is living on borrowed time.</li> <li>The Plan needs to find indirect ways to enable and require everyone in the region to contribute to emissions reductions.</li> <li>Current legislation makes it difficult for local government to address climate change directly, but we cannot take the risk of relying on international negotiations.</li> </ul>
95	Climate change	Policy 3.3.2 - Adapting to, or mitigating the effects of, climate change	Amend	Change the header as follows: "Adapting to <del>or mitigating</del> the effects of <u>physical limits that can not be adequately mitigated climate change</u> "	<ul style="list-style-type: none"> <li>Climate change is well advanced and the prospects of life as we know it are small if the global average temperature increases by more than 2deg.</li> <li>The Plan needs to find indirect ways to enable and require everyone in the region to contribute to emissions reductions. Only adapting to insidious and ongoing trends that pose a risk is living on borrowed time.</li> <li>Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> </ul>
96	Objectives on resilience, health and safety	Objective 3.4 - Good quality infrastructure and services meet community needs	Amend	Amend as follows: " <del>Good quality</del> <u>Reliable/Sustainable</u> infrastructure and services meet community needs".	Wording in the Plan needs to be clear and uncompromising. Suggested wording change gives the plan more teeth.
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend policy header as follows: "Policy 3.4.2 - Managing infrastructure activities <u>to maximise benefit and minimize adverse effects</u> ".	Wording in the Plan needs to be clear and uncompromising.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend policy header as follows: "Policy 3.5.1 Recognising national and regional significance <u>and effects of infrastructure</u> "	Wording in the Plan needs to be clear and uncompromising.
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend policy header as follows: "Policy 3.5.2 Managing adverse effects of infrastructure that has national or regional significance <u>to minimise adverse effects</u> ".	Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	Amend policy header as follows: "Policy 3.5.3 Protecting infrastructure of national or regional significance <u>where community cost does not exceed community benefit</u> ".	Suggested wording changes provides for the setting of a sustainability indicator and gives the plan more teeth.
109	Energy	Policy 3.6.1 - Using existing renewable electricity generation structures and facilities	Amend	Amend policy header as follows: "Policy 3.6.1 Using <u>existing</u> renewable electricity generation structures and facilities".	The primary issue for the Plan is one of carbon and energy constraint. Plan provisions will need to anticipate and facilitate preparations in the community for energy constraints.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	Amend policy header as follows: "Policy 3.6.2 Promoting <u>and incentivising demand side management and</u> small scale renewable electricity generation".	The primary issue for the Plan is one of carbon and energy constraint. Plan provisions will need to anticipate and facilitate preparations in the community for energy constraints.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	Amend policy header as follows: "Policy 3.6.3 Protecting the generation capacity of renewable electricity generation activities <u>where community cost does not exceed community benefit</u> "	No reason given.
112	Energy	Policy 3.6.4 - Enabling more efficient transport of electricity	Amend	Amend policy header as follows: "Policy 3.6.4 <u>Promoting electrification of public transport systems including the main trunk railway</u> Enabling more efficient transport of electricity"	The primary issue for the Plan is one of carbon and energy constraint. Plan provisions will need to anticipate and facilitate preparations in the community for energy constraints.
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	Amend policy header as follows: "Policy 3.6.5 <u>Requiring efficient Protecting electricity distribution infrastructure and effective demand side management</u> "	<ul style="list-style-type: none"> <li>• Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> <li>• The primary issue for the Plan is one of carbon and energy constraint. Plan provisions will need to anticipate and facilitate preparations in the community for energy constraints.</li> </ul>
114	Energy	Policy 3.6.6 - Reducing long term demand for fossil fuels	Amend	Amend as follows: "Policy 3.6.6 Reducing <del>long term</del> demand for fossil fuels Reduce the <del>long term</del> demand for fossil fuels from Otago's communities, by: a) <del>Promoting</del> Encouraging the development of compact and well integrated urban areas, to reduce travel needs within those areas; and ... c) <del>Promoting</del> Enabling the development or upgrade of transport infrastructure and associated facilities that: ..."	<ul style="list-style-type: none"> <li>• Policy needs a radical rethink to reflect urgent need to reduce greenhouse gasses and integrate accordingly with other policies.</li> <li>• Policy as written currently proposes a suite of weakly-worded planning measures with very limited emphasis on public transport.</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	Amend policy header as follows: "Policy 3.7.1 Using the principles of <del>sustainable</del> good urban design".	Wording in the Plan needs to be clear and uncompromising.
119	Urban design	Policy 3.7.2 - Encouraging use of low impact design techniques	Amend	Amend policy header as follows: "Policy 3.7.2 <del>Requiring</del> Encouraging use of low impact design techniques".	Wording in the Plan needs to be clear and uncompromising.
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend policy header as follows: "Policy 3.7.3 <del>Requiring</del> Designing for <u>sustainable and energy efficient</u> warmer buildings".	Wording in the Plan needs to be clear and uncompromising.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend policy header as follows: "Policy 3.7.4 <del>Requiring</del> Designing for <u>easy</u> good access in public spaces".	Wording in the Plan needs to be clear and uncompromising.
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Amend	Amend as follows: "Objective 3.8 Urban <del>development</del> growth is well designed and integrates <u>efficiently</u> effectively with adjoining urban and rural environments".	The concepts of "resilience" and "development" are more appropriate terms for the Plan than increasing "prosperity" and "growth".
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Amend policy header as follows: "Policy 3.8.1 Managing for urban <del>development</del> growth"	The concepts of "resilience" and "development" are more appropriate terms for the Plan than increasing "prosperity" and "growth".
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Amend	Amend the policy header as follows: "Policy 3.8.2 Controlling growth where there are identified urban <del>development</del> growth boundaries or future urban development areas"	The concepts of "resilience" and "development" are more appropriate terms for the Plan than increasing "prosperity" and "growth".
178	Methods	Methods - general	Amend	Methods for inclusion in the plan [should] include:	<ul style="list-style-type: none"> <li>• To be less anthropocentric.</li> <li>• We are dealing with the remaining elements of significant landscape,</li> </ul>



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				<p>a) Manage indigenous vegetation clearance using case by case assessments to determine whether an area of indigenous vegetation or habitat is significant and thus warrants protection.</p> <p>b) Include appropriate regulatory methods that control the clearance or modification of indigenous vegetation and habitats of indigenous fauna.</p> <p>c) Require ecological assessments to accompany a resource management proposal or plan for an activity or development that may affect areas of indigenous vegetation and habitats of indigenous fauna.</p>	<p>wetland, pristine water, etc.</p> <ul style="list-style-type: none"> <li>Regional and District Councils have a responsibility to maintain indigenous biodiversity and to provide for the protection of significant indigenous vegetation and significant habitats of indigenous fauna, and also provide for the preservation of the natural character of the coastal environment, wetlands, rivers, lakes and their margins.</li> </ul>
178	Methods	Methods - general	Amend	Require Council to actively inform the general public of the need for any transformational policy.	No reason given
197	Method 6 - Research, Monitoring and Reporting	Method 6 - Research, Monitoring and Reporting	Amend	Ensure that key policies and regulations are backed up with monitoring requirements that include sustainability indicators (e.g. emission-reduction plans or carbon budgets, and for emissions, impact assessment for new infrastructure).	<ul style="list-style-type: none"> <li>Setting environmental limits as requested, will imply effective monitoring and accounting.</li> <li>Life cycle assessment needs to be part of evaluation of the resource use and environmental efficiency of land use and other systems to account for the whole supply chain.</li> </ul>
226	Anticipated Environmental Results	Anticipated Environmental Results - General	Amend	This plan needs to set targets for the ORC so that they be audited at regular intervals using effective indicators.	Many good provisions in the PRPS that should be implemented.
253	Other comments	Structure of the document & useability - general	Did not specify	Reduce the number of provisions by altering and simplifying the structure of the Plan.	This would make it a more useful and accessible document.
253	Other comments	Structure of the document & useability - general	Amend	<ul style="list-style-type: none"> <li>Set out the Council's presuppositions regarding the status and trends in the environment to provide clear platform for identifying issues.</li> <li>Assumptions need to be brought together in a single section near the beginning.</li> </ul>	<ul style="list-style-type: none"> <li>It should be clear how the provisions in the new RPS are anticipated to reverse negative trends, and result in different environmental outcomes.</li> <li>Presuppositions need to be based on rigorous research and statistics, and the established principles of physics, ecology and environmental management.</li> <li>Issues may become more evident as a result of the suggested amendments.</li> </ul>
253	Other comments	Structure of the document & useability - general	Amend	Wording in the Plan needs to be clear and uncompromising where it addresses primary issues.	Where the evidence is clear or the stakes are high the Plan needs to make it clear to the community that those who do not adapt to the new imperatives put themselves and potentially others at risk.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	<p>Amend the table following the introduction to Objective 2 (pp 19 &amp; 20) by:</p> <ul style="list-style-type: none"> <li>Changing the category headers as follows: <u>Remaining s</u>Significant indigenous vegetation and habitats of indigenous fauna; <u>Significant and o</u>utstanding natural features, landscapes and seascapes; <u>Remaining s</u>Special amenity landscapes;</li> <li>Making suggested amendments to the policy headers (see submissions on Policies 2.2.1 to 2.2.15).</li> </ul>	<ul style="list-style-type: none"> <li>It is important to acknowledge that we have already lost a lot and so are dealing with the remaining elements of significant landscape, wetland, pristine water etc.</li> <li>Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> </ul>
265	Chapter B2 - High quality natural resources	Outcome 2 and introduction	Amend	<p>Introduction to Part B Chapter 2:</p> <ul style="list-style-type: none"> <li>Rewrite based on the strong sustainability model [see submission for information on this model].</li> <li>Establish first concept of social and economic</li> </ul>	<ul style="list-style-type: none"> <li>Shift the focus of activity away from promoting economic development and financial return to sustainably managing natural and physical resources.</li> <li>A healthy "land base" is an essential platform for a healthy society and economy.</li> </ul>

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				subsets of the biosphere or ecosystem rather than leading straight in on economic drivers. • Amend 1st sentence as follows: "Otago's future is <u>currently</u> driven by three sectors etc."	• Wording in the Plan needs to be clear and uncompromising.
266	Objectives on high quality natural resources	Need 2.1	Amend	Amend the Need associated to Objective 2.1 as follows: "We need to know enough <u>as much as possible</u> about the many values and characteristics of Otago's natural and physical resources, and the ecosystem services they provide for us, to be able to manage the <u>adverse</u> effects of human activities on the environment's life supporting capacity adequately."	Wording in the Plan needs to be clear and uncompromising. Suggested wording change gives the plan more teeth.
267	Objectives on high quality natural resources	Need 2.2	Amend	Amend Need associated to Objective 2.2. as follows: "It is a matter of <u>regional and</u> national importance to recognise and <u>protect significant and outstanding features of the landscape special protection including associated processes and functions provide for natural resources systems and processes.</u> "	• To set a baseline driven by sustainability criteria but recognising that some elements in the landscape need a higher level of preservation. • Prefer using the word "environment" as meeting sustainability criteria demands that we maintain the entire environment and don't start picking or choosing on the basis of current values or economic drivers.
270	Objectives on high quality natural resources	Introduction to Objective 2.2	Amend	Amend the introduction to Objective 2.2 (p. 32) as follows: "Otago has many unique landscapes, natural features and areas of indigenous biodiversity which are nationally or regionally important. Giving these a higher level of protection <u>above a common baseline of sustainable resource management</u> ensures <u>their special quality</u> they will be <u>susretained</u> , <u>and activities with the potential for adverse effect will be directed elsewhere while consumptive use of resources will be directed to areas where adverse effects are more acceptable.</u> "	Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.
271	Objectives on high quality natural resources	Introduction to Objective 2.3	Amend	Amend Introduction to Objective 2.3 (p.39) as follows: "Our resources are interconnected, and [...]. These diverse resources contribute to distinct land- and seascapes and <u>are often integral to support</u> a corresponding range of ecosystems. [...]"	• Strongly supports the last sentence of the introduction to the objective. • Sustainable management requires integration across land, freshwater, estuarine and marine interfaces as a single ecosystem complex to be optimised and sustainable.
272	Chapter B3 - Resilience, health and safety	Outcome 3 and introduction	Amend	Amend the last sentence of the introduction to the outcome (p. 31) as follows: "Ensuring Otago's communities develop having regard to environmental constraints, the effects of activities on the environment, and are designed in way which helps us to prepare for, respond, recover and adapt to such disruptions, will help make Otago's communities <u>more</u> resilient."	Wording in the Plan needs to be clear and uncompromising.
274	Objectives on resilience, health and safety	Need 3.2	Amend	• Amend the Need associated to Objective 3.2 as follows: "While many of these events are beyond our control, we need to reduce their potential impacts on people's safety, health and wellbeing <u>and their likelihood.</u> "	Wording in the Plan needs to be clear and uncompromising. Suggested changes to the wording give the plan more teeth.
284	Objectives on resilience, health and safety	Introduction to Objective 3.3	Amend	• Amend the Need associated to Objective 3.3 as follows: "We need to have consistent guidance on sea level rise <u>and; extreme</u>	Wording in the Plan needs to be clear and uncompromising. Suggested changes to the wording give the plan more teeth.

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				<u>weather events</u> and <u>management</u> for adverse effects that will <u>extend</u> beyond the life of this RPS."	
287	Objectives on resilience, health and safety	Introduction to Objective 3.6	Amend	• Amend the Need associated to Objective 3.6 as follows: " <u>To reduce exposure to this issue</u> <u>We need to minimise</u> our dependency on fossil fuels and improve our energy resilience and efficiency of use."	Wording in the Plan needs to be clear and uncompromising. Suggested changes to the wording give the plan more teeth.
287	Objectives on resilience, health and safety	Introduction to Objective 3.6	Amend	Amend the introduction to Objective 3.6 (p.61) as follows: "The social and economic well-being of Otago's people [...] while increasing our ability to sustain economic <u>development</u> growth. In particular, Otago's reliance on fossil-based transport fuels <u>must</u> be reduced in the medium to long term through more efficient or alternative transport fuels <u>better urban planning for access and public transport</u> ."	<ul style="list-style-type: none"> <li>• Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.</li> <li>• The concepts of "resilience" and "development" are more appropriate terms for the Plan than increasing "prosperity" and "growth".</li> <li>• Plan provisions will need to anticipate and facilitate preparations in the community for energy constraints.</li> </ul>
288	Objectives on resilience, health and safety	Introduction to Objective 3.7	Amend	• Amend the Need associated to Objective 3.7 as follows: "We need communities that are designed to improve our quality of life and resilience and create more attractive opportunities for <u>sustainable business investment</u> . We need infrastructure that meets modern standards, <u>is energy and material efficient</u> , is future-proofed, and is affordable."	Wording in the Plan needs to be clear and uncompromising. Suggested changes to the wording give the plan more teeth.
289	Objectives on resilience, health and safety	Introduction to Objective 3.8	Amend	• Amend the Need associated to Objective 3.8 as follows: "We need <u>urban development to be well-designed and integrated urban growth</u> , to achieve effective and affordable infrastructure, and improve resilience. We need to make the best use of our natural and physical resources and reduce the effects of unplanned <u>development</u> growth."	Wording in the Plan needs to be clear and uncompromising. Suggested changes to the wording give the plan more teeth.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Include a broader discussion around and recognition of the roles resource users fulfil in meeting positive outcomes resulting from resource use and the agricultural sector's contribution to wellbeing in Otago.	<ul style="list-style-type: none"> <li>• Insufficient recognition of the economic benefits derived from natural resource use.</li> <li>• The RPS should explicitly state the importance of the primary production sector to achieving the desired outcomes.</li> <li>• A region rich in economic, social and cultural terms is more able to deliver good environmental outcomes.</li> <li>• It downplays the role and commitment of farmers to achieving good outcomes across all four wellbeings, and diminishes the potential for a mutually beneficial relationship between ORC and farmers.</li> <li>• Otago lacks the additional and complementary economic development strategy, and it falls to the RPS to deliver this</li> </ul>
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	1) Frame the RPS with key issues, to provide a better linkage between the higher level intentions and the subsequent methods and policies. 2) Review the use of the words 'avoid', 'prevent' or 'require' in light of King Salmon and the	<p>1) The proposed RPS is structured to deliver upon the four interrelated outcomes rather than outlining the key issues to be addressed. This approach creates risks around interpretation and implementation of the plan.</p> <ul style="list-style-type: none"> <li>• An 'issues-based' focus ensures there are direct linkages to the policies and methods and the key issues the plan is seeking to</li> </ul>

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				<p>implications for the region's resource use.</p> <p>3) Where relevant the RPS should step back from giving prescriptive directions to individual Territorial Local Authorities (TLAs). TLAs should have sufficient scope to address local issues and opportunities within the local context through local planning processes.</p>	<p>address.</p> <ul style="list-style-type: none"> <li>• Re-phrasing of the four outcomes as key issues will provide better clarity.</li> <li>2) The choice of words is important in higher level planning statements.</li> <li>• In King Salmon, the use of the word "avoid" was found to mean "not allow" or "prevent the occurrence of."</li> <li>3) • The RPS should recognise and provide for good economic and social outcomes by avoiding the imposition of unnecessary restraints on primary production; specifically providing for the positive aspects of primary production where reasonable and appropriate;</li> <li>• The proposed RPS is prescriptive and diminishes the potential for innovation.</li> <li>• The proposed RPS should align more with the aspirational intent of the four outcomes.</li> <li>• Territorial Local Authorities (TLAs) are required to 'give effect to' the RPS. TLAs are also expected to deliver on broader economic development outcomes as well as deliver the outcomes sought through the RPS; a more flexible RPS framework allows for these balanced discussions to occur at the local level, within the local context.</li> <li>• Otago lacks the additional and complementary economic development strategy, and it falls to the RPS to deliver this.</li> </ul>
5	Overall approach	Introduction - The Treaty Partner	Support	Retain as drafted.	<ul style="list-style-type: none"> <li>• Submitter supports the draft RPS's recognition of Kai Tahu as takata whenua of the Otago region, and the critical role of Kai Tahu in informing the region's regulatory response to challenges in partnership with the regional council.</li> <li>• It is useful to have the RPS define the roles of both Iwi and the Treaty in the introduction to the RPS.</li> <li>• We consider a similar discussion on the social and economic benefits of primary production and resource use should also be included.</li> </ul>
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	<p>Amend as follows (or words to similar effect):</p> <p>"Ensure that local authorities exercise their functions and powers, to:</p> <p>a) Accord Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,</p> <p>b) Involve Kai Tahu <u>at an early stage in respect to its resource management planning and governance processes decision-making processes and implementation;</u> and</p> <p>...</p> <p>f) Ensure that district and regional plans:</p> <p>i. Give effect to the Ngai Tahu Claims Settlement Act 1998; and</p> <p>ii. Recognise and provide for statutory acknowledgement areas, as detailed in Schedule 2; and</p> <p>iii. <del>Provide for other areas in Otago that are recognised as significant to Kai Tahu in a manner similar to that prescribed for statutory acknowledgement areas."</del></p>	<ul style="list-style-type: none"> <li>• Support the development of a partnership approach for the governance and plan preparation of Otago's resource management plans. However, 1.1.2 a) as currently written elevates the takata whenua viewpoint in such a manner as to undermine the ability for other residents and resource users to appropriately have their say.</li> <li>• Do not agree that takata whenua should be afforded such a significant role in implementation as it will impose unnecessary costs and time delays on resource users through the consenting process and undermine the ability for landowners to have a reasonable discussion with takata whenua around how best to achieve mutual ends in a context dependent manner.</li> <li>• Support the intention that areas of significance to Kai Tahu are recognised, but consider 1.1.2 f) iii has the potential to significantly disadvantage landowners and resource users to have a reasonable discussion with takata whenua around how best to achieve mutual ends in a context dependant manner.</li> </ul>
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and	Support	Adopt the Objective as proposed.	The RPS plays an important role in translating the takata whenua point of view into the region's regulatory framework.

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		customary resources are sustained			
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend as follows (or words to similar effect): "Manage the natural environment to support Kai Tahu wellbeing by: a) Ensuring resources support their customary uses and cultural values <u>are identified</u> (as detailed in Schedules 1A and B); and b) <del>Safe-guarding the life-supporting capacity of natural resources</del> ".	<ul style="list-style-type: none"> <li>• The policy is unclear and elevates Kai Tahu concerns within each resource management issue. In some regulatory matters this may be appropriate; in others it would result in unnecessarily high consenting costs, time delays and issues for resource users, creating tension.</li> <li>• Kai Tahu values, interests and concerns should be identified through the RPS, but managed through specific management planning contexts.</li> <li>• Need for greater certainty around how the values translate at the resource use level. Currently the values and interests outlined in schedule 1A and 1B are not sufficiently detailed to provide this clarity.</li> </ul>
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend as follows (or words to similar effect): " <del>Protect</del> Important sites and values of cultural significance to Kai Tahu <u>are identified and managed</u> " " <del>Protect</del> <u>Identify</u> important values, as detailed in schedules 1A and B, and sites of cultural significance to Kai Tahu as detailed in Schedule 1C, <u>and managed these</u> by: ..."	<ul style="list-style-type: none"> <li>• The identification of 'important values' at this level followed by specific planning responses and engagement at the local level is a better avenue to address Kai Tahu concerns.</li> <li>• Schedules 1A and 1C are vague and hard to define, which raises the appropriateness of 'protecting' these values especially in the context of other RMA documents that have to "give effect" to the Proposed RPS.</li> <li>• In some regulatory matters 'protect' may be appropriate ; in others it would simply add unnecessarily high consenting costs and issues for resource users, creating tension rather than a better understanding of the values and interests that Kai Tahu are seeking to protect.</li> </ul>
21	Kai Tahu values, rights, interests and customary resources	Policy 1.2.4 - Enabling Kai Tahu relationships with wahi tupuna and associated sites	Amend	Amend as follows (or words to similar effect): "Enable Kai Tahu relationships with wahi tupuna and associated sites by: a) Facilitating Kai Tahu access to sites of cultural significance, <u>encouraging engagement between landowner and Kai Tahu where these exist on or accessed by private land</u> ; and ..."	<ul style="list-style-type: none"> <li>• Submitter supports the intent of the policy however, open access at all times can be dangerous (for both those seeking access and the landholder) and is often impractical with potential for animal welfare issues .</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend as follows (or words to similar effect): "Recognise freshwater values, and manage freshwater, to: [new point] <u>provide for the economic and social wellbeing of the Otago region and its inhabitants</u> ... c) <del>Protect</del> <u>Manage and where necessary protect</u> outstanding water bodies and wetlands; and d) <del>Protect</del> <u>Provide for</u> migratory patterns of freshwater species, unless detrimental to indigenous biodiversity; and ... j) <del>Protect</del> <u>Provide for</u> Kai Tahu values; and ... l) <del>Protect</del> <u>Provide for</u> important recreation values; and ..."	<ul style="list-style-type: none"> <li>• New point - The policy insufficiently recognises the benefits (particularly economic and social) derived from resource use.</li> <li>• The use of the word "protect" is a high threshold and where values are "ephemeral" protection can be difficult to achieve. A less onerous policy would achieve similar outcomes while providing more flexibility.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend as follows (or words to similar effect): "Policy 2.1.2 g) <del>Protect</del> <u>Provide for</u> Kai Tahu values; and ..."	<ul style="list-style-type: none"> <li>• The use of the word protect is a high threshold and where values are "ephemeral" protection can be difficult to achieve.</li> <li>• A less onerous policy would achieve similar outcomes while providing more flexibility.</li> </ul>
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Delete proposed Policy 2.1.5 f).	<ul style="list-style-type: none"> <li>• Submitter supports the recognition of the importance of soil to primary production and the primary sector.</li> <li>• The policy proposes an onerous level of protection and the benefit for the region is not the soil resource but the resulting production. The RPS should better recognise the importance of the primary</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					production sector, and any policy developed around soil resources provides TLAs with the flexibility to identify and incorporate the importance of soil resources to the district and regional wellbeing while also providing for other matters.
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend as follows (or words to similar effect): "Policy 2.1.6 Managing for ecosystem and indigenous biodiversity values ... c) <del>Buffer or link existing ecosystems; and</del> d) <del>Protect important hydrological services, including the services provided by tussock grassland are recognised and provided where appropriate; and ...</del> g) <del>Protect biodiversity significant to Kai Tahu is identified and active management is encouraged; and "...</del>	<ul style="list-style-type: none"> <li>• c) The buffering or linking of existing ecosystems may place limitations on otherwise legitimate and beneficial land uses, and is an issue better addressed through district planning.</li> <li>• d) The requirement to protect important hydrological services, including the services provided by tussock grassland, is an onerous measure and requires some landowners to give up productive potential for the good of other landowners. A non-regulatory, catchment based approach to the management of hydrological services is both more preferable, and more likely to result in maximisation of benefits derived from these services.</li> <li>• g) Protect is a significant threshold considering the benefits that identifying and active management of areas with biodiversity significant to Kai Tahu can have for all parties.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	<ul style="list-style-type: none"> <li>• Replace clause a) with clause c)</li> <li>• Delete clause b)</li> <li>• Wording is amended as follows (or words to similar effect): "Protect <del>Manage</del> and enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects on <u>on areas of significant indigenous vegetation and significant habitats of indigenous fauna</u> those values which contribute to the area or habitat being significant; and b) <del>Avoiding significant adverse effects on other values of the area or habitat; and</del> c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and ..."</li> </ul>	<ul style="list-style-type: none"> <li>• Policy title refers to "managing" but text refers to "protect/enhance" values. Prefer management approach as it provides for reasonable resource use where it does not conflict with intent of policy.</li> <li>• The focus of should be on avoiding any significant adverse effects on significant indigenous vegetation and significant habitats of indigenous fauna rather than "values".</li> <li>• As currently worded, the policy is not easy to translate or implement.</li> <li>• The provisions should be reordered to follow a logical process.</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	<ul style="list-style-type: none"> <li>• Replace clause a) with clause c)</li> <li>• Delete clause b)</li> <li>• Amend as follows (or words to similar effect): "Protect, enhance and restore the values of outstanding natural features, landscapes and seascapes, by: a) Avoiding adverse effects on <u>outstanding natural features, landscapes, and seascapes</u> those values which contribute to the significance of the natural feature, landscape or seascape; and b) <del>Avoiding, remedying or mitigating other adverse effects on other values; and</del> c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and ..."</li> </ul>	<ul style="list-style-type: none"> <li>• The focus of should be on avoiding any significant adverse effects on outstanding natural features, landscapes, and seascapes.</li> <li>• As currently worded, the policy is not easy to translate or implement.</li> <li>• The provisions should be reordered to follow a logical process.</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>• The policy will result in significant social and economic costs when an area of privately owned land is designated or asserted to be highly valued.</li> <li>• The Section 32 evaluation does not include an assessment of the potential costs.</li> <li>• Policy is more prescriptive and specific than what is generally</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					considered appropriate for a regional policy statement. <ul style="list-style-type: none"> <li>• Submitter questions the efficiency and effectiveness of this approach and asks that it be better justified.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	<ul style="list-style-type: none"> <li>• Replace clause a) with clause c)</li> <li>• Delete clause b)</li> <li>• Amend as follows (or words to similar effect):  a) <del>Avoiding significant adverse effects on those values which contribute to the special amenity of the landscapes or highly valued of the natural features; and</del>  b) <del>Avoiding, remedying or mitigating other adverse effects on other values; and</del>  c) Assessing the significance of adverse effects on <del>those values</del>, as detailed in Schedule 3; ...</li> </ul>	<ul style="list-style-type: none"> <li>• Submitter does not support the identification of lower tier or secondary landscapes.</li> <li>• The focus of the policy should be on avoiding any significant adverse effects on special amenity landscapes and highly valued natural features.</li> <li>• As currently worded, the policy is not easy to translate or implement.</li> <li>• The provisions (a) to (c), as ordered, do not follow a logical process.</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	<ul style="list-style-type: none"> <li>• Replace clause a) with clause c)</li> <li>• Delete clause b)</li> <li>• Amend as follows (or words to similar effect):  "a) <del>Avoiding significant adverse effects on those values which contribute to the outstanding natural character of an area</del><u>the coastal environment; and</u>  b) <del>Avoiding significant adverse effects on those values which contribute to the high natural character values of an area; and</del>  c) Assessing the significance of adverse effects on <u>the outstanding natural character of the coastal environment</u><del>those values</del>, as detailed in Schedule 3; ..."</li> </ul>	<ul style="list-style-type: none"> <li>• The focus of should be on avoiding any significant adverse effects on the coastal environment.</li> <li>• As currently worded, the policy is not easy to translate or implement.</li> <li>• The provisions (a) to (c), as ordered, do not follow a logical process.</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	<ul style="list-style-type: none"> <li>• Amend as follows (or words to similar effect):  "a) Avoiding significant adverse effects, including <u>significant</u> cumulative effects, on those values which contribute to the water body or wetland being outstanding; and  b) <del>Avoiding, r</del>emediating or mitigating other adverse effects on the water body or wetland's values; and  c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and  d) Controlling the adverse effects of pest species, preventing their introduction and reducing their spread; and  e) Encouraging enhancement of outstanding water bodies and wetlands <u>where feasible.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>• a) A degree of significance required in respect to cumulative effects.</li> <li>• b) Use of the word 'avoiding' is unnecessarily punitive and goes beyond what is required for adverse effects which are neither significant nor cumulative.</li> <li>• e) Encouraging enhancement should be sought through non-regulatory methods and qualified for feasibility.</li> </ul>
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	<ul style="list-style-type: none"> <li>• Delete the policy, and adopt a new policy with wording as follows (or words to similar effect) :  <u>"Recognise that use and development of high value soils enables people and communities to provide for their economic, social and cultural wellbeing."</u></li> </ul>	<ul style="list-style-type: none"> <li>• Submitter supports the intent to protect the values associated with highly valued soil resources.</li> <li>• The policy as currently worded may have prescriptive and unreasonable implications.</li> <li>• Favour better recognition of the positive aspects of high value soils to give direction to the district planning processes to assess whether any protection is required, rather than trying to address these matters through the RPS.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>• Policy 2.3.1 a) is deleted.</li> </ul>	<ul style="list-style-type: none"> <li>• a) is largely unnecessary and the suggested amendment provides more flexibility to the planning documents giving effect to the policy.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Amend	Policy 2.3.2 a) is deleted.	<ul style="list-style-type: none"> <li>• a) is largely unnecessary and the suggested amendment provides more flexibility to the planning documents giving effect to the policy.</li> </ul>
62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Oppose	Delete Policy 2.3.3. If the policy is retained, reference to 'nuisance effects' and 'values' should be deleted or suitably replaced.	<ul style="list-style-type: none"> <li>• The concerns driving this policy are largely addressed in policies 2.3.1 and 2.3.2.</li> <li>• The RPS should provide for specific policies and plans to be developed on a catchment by catchment basis to manage the potential effects on water quality and to set and manage to limits in those catchments through a partnership based approach with the community and landowners.</li> <li>• The RPS should focus on the management/reduction of discharges to water rather than managing land use activities.</li> <li>• The reference to 'nuisance effects' is an alarmingly low bar and inappropriate for a regional policy statement.</li> <li>• The reference to the maintenance or enhancement of 'values' provides no clear direction to the plan user, and is potentially onerous.</li> </ul>
63	Natural systems and interdependencies	Policy 2.3.4 - Applying an integrated management approach for the coastal environment	Amend	Policy 2.3.4 b) ii. is deleted	<ul style="list-style-type: none"> <li>• Reducing the potential for health and nuisance effects can incorporate a wide range of activities, regardless of significance.</li> <li>• Clause (b)(ii) adds nothing material to this policy while creating unnecessary uncertainty.</li> </ul>
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows (or words to similar effect): "Protection, use and development of natural and physical resources <u>is environmentally sustainable recognises environmental constraints.</u> "	As written the Objective fails to acknowledge the positive benefits of resource use. Objective should be re-written to focus on sustainability as the desired outcome; this is an easier to understand, holistic reference.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows (or words to similar effect): "Recognise the natural and physical environmental constraints of an area, the effects of those constraints on activities, and the effects of those activities on those constraints, <u>while providing for the reasonable use of these resources, including: ...</u> "	<ul style="list-style-type: none"> <li>• It is important to recognise the natural and physical environmental constraints of an area, the effects of those constraints on activities, and the effects of those activities on those constraints.</li> <li>• This policy should also provide scope for those resources to be used to provide for the economic and social wellbeing of Otago's residents.</li> </ul>
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Support	Adopt as proposed.	<ul style="list-style-type: none"> <li>• The risks from natural hazards cannot be completely mitigated. Risks should be minimised based on the scale of threat they pose to human communities.</li> </ul>
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows (or words to similar effect): "Identify natural hazards that may adversely affect Otago's <u>human communities</u> , including hazards of low likelihood and high consequence."	<ul style="list-style-type: none"> <li>• Regulatory responses to these potential hazards should be appropriate to the risk of the hazard to human communities and should avoid an unnecessarily onerous burden for non-inhabited farm structures.</li> </ul>
83	Natural hazard risk	Policy 3.2.3 - Assessing natural hazard consequence	Amend	Amend as follows (or words to similar effect): "Assess the consequences of natural hazards events <u>on Otago's human communities</u> , including by considering: ... <u>k) The costs (including to landowners) of mitigating the hazard.</u> "	<ul style="list-style-type: none"> <li>• Regulatory responses to these potential hazards should be appropriate to the risk of the hazard to human communities and should avoid an unnecessarily onerous burden for non-inhabited farm structures.</li> <li>• The Proposed RPS should enable a balanced look at assessing the risks, and where the costs of addressing remote/minimal risk is unacceptably high for non-inhabited buildings/activities, this lower level of risk should be reflected in local regulation.</li> </ul>
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows (or words to similar effect): "Manage natural hazard risk <u>to human communities</u> , including with regard to: ..."	<ul style="list-style-type: none"> <li>• Regulatory responses to these potential hazards should be appropriate to the risk of the hazard to human communities and should avoid an unnecessarily onerous burden for non-inhabited farm structures.</li> <li>• The RPS should enable a balanced look at assessing the risks, and where the costs of addressing remote/minimal risk is unacceptably high for non-inhabited buildings/activities, this lower level of risk</li> </ul>



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					<p>should be reflected in local regulation.</p> <ul style="list-style-type: none"> <li>• Submitter supports clauses (c) and (e), which outline community's tolerance to risk and sensitivity of activities to risk as considerations.</li> <li>• The policy should better explain that the key issue is in respect to the risk to human communities.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend as follows (or words to similar effect): "Assess activities for natural hazard risk, by considering: ... ; f) <u>The significance of the threat posed to human communities.</u> "	<ul style="list-style-type: none"> <li>• A reference of the significance of that risk to human communities should be included as criteria.</li> </ul>
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows (or words to similar effect): "Avoid increasing natural hazard risk <u>to human communities</u> , including by: ..."	<ul style="list-style-type: none"> <li>• Assessments should be primarily focussed on the risk to human communities.</li> </ul>
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend as follows (or words to similar effect): "Reduce existing natural hazard risk, including by: a) Encouraging activities that <u>significantly</u> : ... b) Discouraging activities that <u>significantly</u> : ... c) Considering the use of exit strategies for areas of significant risk, <u>to human communities</u> ; and d) Encouraging design that facilitates: i. Recovery from <u>significant</u> natural hazard events or ii. Relocation to areas of <u>significantly</u> lower risk; and ..."	<ul style="list-style-type: none"> <li>• Submitter supports the reduction of existing natural hazard risk.</li> <li>• For established land or resource uses this risk has largely been assimilated into planning. In these instances regulation adds little but additional costs.</li> <li>• The significance of these impacts should be considered, as should the costs of mitigating or addressing these impacts.</li> <li>• Clauses (a) and (b) should be qualified with a degree of significance.</li> </ul>
88	Natural hazard risk	Policy 3.2.8 - Applying a precautionary approach	Oppose	Delete Policy 3.2.8.	<ul style="list-style-type: none"> <li>• If the risks from a natural hazard/s is uncertain or unknown, applying the precautionary approach may result in significant or unacceptable costs to the communities irrespective of the scale of the risk.</li> <li>• In instances where there are unknowns or unknowables it is important that councils discuss the potential for risk and the options for addressing this risk with the affected communities. The RPS is not the appropriate regulatory document to inform this discussion.</li> </ul>
89	Natural hazard risk	Policy 3.2.9 - Protecting features and systems that provide hazard mitigation	Amend	Amend as follows (or words to similar effect): "Protect, restore, enhance and promote the use of natural or modified features and systems, which <u>significantly</u> contribute to mitigating the effects of both natural hazards and climate change."	<ul style="list-style-type: none"> <li>• Submitter supports the intent of the policy.</li> <li>• There is potential for the policy to be implemented in such a way that places significant costs on resource users, or regulates for insignificant impacts or perceived impacts on natural hazard mitigation.</li> <li>• A degree of significance is appropriate.</li> </ul>
92	Objectives on resilience, health and safety	Objective 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Support	Adopt as proposed.	<ul style="list-style-type: none"> <li>• It is important that communities are prepared for, and able to adapt to, the effects of climate change.</li> </ul>
96	Objectives on resilience, health and safety	Objective 3.4 - Good quality infrastructure and services meet community needs	Support	Adopt as proposed.	<ul style="list-style-type: none"> <li>• Infrastructure is critical to community, business, and environmental wellbeing.</li> </ul>
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows (or words to similar effect): "Achieve the strategic integration of infrastructure with land use, by: ... b) <u>viii. The effects on existing land use and land users; and ...</u> "	<ul style="list-style-type: none"> <li>• It is important to consider the impacts of infrastructure on primary production and existing land uses.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend as follows (or words to similar effect): "Manage infrastructure activities, to: ... b) Reduce adverse effects of those activities, including cumulative adverse effects on natural	<ul style="list-style-type: none"> <li>• It is important to consider the impacts of infrastructure on primary production and existing land uses. Infrastructure corridors often have adverse economic and social effects on private land.</li> <li>• There are existing regulatory documents which territorial local</li> </ul>

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				and physical resources, <u>primary production and existing land uses</u> ; and ... e) <u>Protect infrastructure corridors from incompatible activities for infrastructure needs, now and for the future</u> ; and ..	authorities are already required to 'give effect to'. There are also existing non-regulatory documents which address the harm to human communities, and the threat from incompatible activities to infrastructure. • Clause e) provides unnecessary additional direction to the district planning process, and unnecessarily elevates the importance of infrastructure. • District planning and regional planning should provide for a more balanced discussion within the local context
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Support	Adopt Policy 3.4.3 as proposed.	• Lifeline utilities, and facilities for essential or emergency services should be designed appropriately to ensure they operate as needed in emergency events.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	• Replace clause a) with clause d) • Amend as follows (or words to similar effect): "Protect <u>Managing adverse effects on the functioning of hazard mitigation measures, lifeline utilities, and essential or emergency services</u> , including by: ... c) <u>Avoiding, r</u> emediating or mitigating other adverse effects on those measures, utilities or services; and ....	• Restricting activities that may result in reverse sensitivity for hazard mitigation, without reference to the significance of the hazard mitigation, and without consideration of the costs that may result from placing restrictions on other reasonable activities, is a very low bar. • The policy proposes to 'protect' when the focus should be on managing. • It is important to first assess the significance of adverse effects as sought under d) as a first order priority.
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	• Replace clause a) with clause d) • Amend as follows (or words to similar effect): "Protect infrastructure of national or regional significance, by: a) Restricting the establishment of <u>incompatible</u> activities that may result in <u>significant</u> reverse sensitivity effects; and b) <u>Avoiding or managing</u> significant adverse effects on the functional needs of such infrastructure; and ..."	• Protecting nationally or regionally significant infrastructure is necessary, but can come at a cost if regulation exceeds what is reasonable. • There are existing regulatory documents which territorial local authorities are already required to 'give effect to'. There are also existing non-regulatory documents which address the harm to human communities, and the threat from incompatible activities to infrastructure. • It is important to first assess the significance of adverse effects as sought under (d) as a first order priority.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	• Replace clause a) with clause d) • Amend as follows (or words to similar effect): "Protect the generation capacity of nationally or regionally significant renewable electricity generation activities, by: ... b) Restricting the establishment of <del>these incompatible</del> activities that may result in <u>significant reverse sensitivity effects</u> ; and ...	• A degree of significance must be included to ensure this protection does not unnecessarily impact other activities that provide for the economic and social wellbeing to the region. • It is important to first assess the significance of adverse effects as sought under (d) as a first order priority.
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	• Replace clause a) with clause d) • Amend as follows (or words to similar effect): "Policy 3.6.5 <u>Protecting electricity distribution transmission</u> infrastructure Protect electricity <del>distribution</del> <u>transmission</u> infrastructure, by: a) Recognising the functional needs of electricity <del>distribution</del> <u>transmission</u> activities; and b) Restricting the establishment of <del>these incompatible</del> activities that may result in <u>significant</u> reverse sensitivity effects; and ... d) <u>Assessing the significance of adverse</u>	• It would be useful for the RPS to clarify the differences between electricity transmission and electricity distribution. Specifying "transmission" provides more certainty. • Electricity distribution/transmission infrastructure is often positioned on private land with land uses that are often reasonably compatible. • There are existing regulatory & non-regulatory documents which territorial local authorities are already required to 'give effect to' or which address the harm to human communities, and the threat from incompatible activities to infrastructure. • Inclusion of (e) provides unnecessary additional direction to the district planning process. • District planning and regional planning should provide for a more balanced discussion within the local context.

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				effects on those needs, as detailed in Schedule 3; and <del>e) – Protecting existing distribution corridors for infrastructure needs, now and for the future</del>	<ul style="list-style-type: none"> <li>It is unclear what this policy adds to other policy related to regionally or nationally significant infrastructure.</li> <li>It is important to first assess the significance of adverse effects as sought under (d) as a first order priority.</li> </ul>
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Support	Adopt as proposed.	<ul style="list-style-type: none"> <li>Inappropriate or poorly designed urban development can create unnecessary infrastructure and other costs.</li> <li>Urban areas should be well designed and considered.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Amend as follows (or words to similar effect): "c) Identifying future growth areas that: i. Minimise adverse effects on rural productivity, including <del>loss of highly valued soils or creating competing urban demand for water and other resources; and ..."</del>	<ul style="list-style-type: none"> <li>Urban development needs to be considered and proactively planned for in district planning documents, over an appropriate timeframe.</li> <li>Particular pressures for each of Otago's territorial authorities will be different.</li> <li>There should be flexibility through the RPS to enable local discussions and trade-offs, particularly through zoning which works to address other issues (reverse sensitivity).</li> <li>Submitter supports clause a) as it provides for considered and flexible management.</li> <li>Submitter is cautious about the inclusion of productive soils within this policy and does not favour heavy regulatory protection of soils through the RPS</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Support	Adopt the policy as proposed.	<ul style="list-style-type: none"> <li>Urban development can adversely impact primary production through reverse sensitivity, increased infrastructure costs (operating and capital), the loss of soils from productive use and through issues associated with urban sprawl.</li> <li>Urban development needs to be considered and proactively planned for in district planning documents, over an appropriate timeframe.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Oppose	Delete Policy 3.8.3	<ul style="list-style-type: none"> <li>Economic viability of the farming operation is underpinned through the ability to make land use decisions.</li> <li>Submitter favours the RPS providing scope for district planning processes to address the issues underpinning this policy.</li> </ul>
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows (or words to similar effect): <del>"Many Otago relies on natural and physical resources we rely on for economic activity and these should be appropriately managed wellbeing are finite and under pressure from different uses and users."</del>	<ul style="list-style-type: none"> <li>Objective 4.4 would best be met by providing better recognition of the positive outcomes from resource use right across the RPS, particularly within the introduction, and by reducing the content of the RPS to provide for a more enabling regulatory framework.</li> </ul>
144	Objectives on use and enjoyment of natural and built environment	Objective 4.1 - Public access to areas of value to the community is maintained or enhanced	Support	Adopt Objective 4.1 as proposed.	<ul style="list-style-type: none"> <li>Submitter supports the objective's focus on development and subdivision.</li> <li>Where access occurs across private land there is potential for significant issues (including safety for those seeking access) given much of this private land includes operating farms. These issues should be appropriately acknowledged in the subsequent policies and methods of the RPS.</li> </ul>
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for economic production	Amend	Amend as follows (or words to similar effect): <del>"Sufficient Pressures on land used is managed and protected for economic production are appropriately managed."</del>	<ul style="list-style-type: none"> <li>As written the Objective indicates a heavy regulatory hand, which is not sufficiently justified.</li> <li>Submitter recommends rewording to provide greater clarity.</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows (or words to similar effect): "Policy 4.3.1 <del>Managing</del> <u>Providing for</u> for rural activities <del>Manage</del> <u>Providing for</u> activities in rural areas, to support the region's <u>economic and social wellbeing</u> economy and communities, by: a) <del>Enabling farming, ancillary activities and other rural activities that support the rural</del>	<ul style="list-style-type: none"> <li>Policy should be reworded to better reflect its overall intent.</li> </ul>

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				economy; and b) <del>Minimising</del> <u>Managing</u> the loss of soils highly valued for their versatility for primary production; and ... d) <del>Minimising</del> <u>Managing</u> the <del>inappropriate</del> subdivision of productive rural land <del>into smaller lots that may where this will</del> result in rural residential activities <u>incompatible with primary production</u> ; and ...	
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Amend	Amend as follows (or words to similar effect): "Minimising the conversion of tussock grasslands to species which are less able to capture and hold precipitation <u>where the impacts on water yield are likely to be significant.</u> "	<ul style="list-style-type: none"> <li>The policy, as written, is too directive.</li> <li>Submitter prefers the policy seeks to avoid any significant reduction in water yield by first assessing the potential role for tussock grassland in respect to retention of water within each catchment, and then, if necessary or warranted, developing appropriate regulatory or non-regulatory mechanisms to address the issue within each catchment.</li> </ul>
161	Objectives on use and enjoyment of natural and built environment	Objective 4.4 - Otago's communities can make the most of the natural and built resources available for use	Amend	Amend as follows (or words to similar effect): "Objective 4.4 Otago's communities can make the most of the natural and built resources <del>available for use</del> "	<ul style="list-style-type: none"> <li>As written the Objective indicates a heavy regulatory hand, which is not sufficiently justified.</li> <li>Rewording of the Objective provides greater clarity.</li> </ul>
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	Amend as follows (or words to similar effect): "Ensure an efficient allocation and use of water by: a) Requiring that the volume of water allocated does not exceed what is necessary for <del>the purpose of reasonable use, including</del> <u>appropriate allowance for reasonable variability in use between practices and seasons</u> ; and b) Requiring the development or upgrade of infrastructure that increases use efficiency, <u>where economically feasible</u> ; and..."	<ul style="list-style-type: none"> <li>Clause a) has potential to be interpreted tightly and should be rewritten to allow for reasonable seasonal variation in use, and/or allow for reasonable changes between practices as needed.</li> <li>Submitter supports clause d) as a potential 'win/win' across the four wellbeings.</li> </ul>
165	Making the most of available resources	Policy 4.4.3 - Encouraging environmental enhancement	Amend	Amend as follows (or words to similar effect): "Encourage activities which <u>significantly</u> contribute to enhancing the natural environment, including to: ... h) Buffer or link ecosystems, habitats and areas of significance <del>that contribute to ecological corridors</del> ; ...."	<ul style="list-style-type: none"> <li>Submitter supports the proposal to encourage activities that contribute to the enhancement of the natural environment but would favour a policy that is less prescriptive.</li> <li>Some activities are not feasible or likely to contribute anything of significance.</li> <li>Cautious of "ecological corridors" and risk of costs to primary producer without significantly improving natural resources.</li> <li>This is a matter for district planning processes to address where appropriate.</li> </ul>
166	Objectives on use and enjoyment of natural and built environment	Objective 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Amend	Amend as follows (or words to similar effect): "Objective 4.5 Adverse effects of using and enjoying Otago's natural and built environment are <u>appropriately managed/minimised</u> "	<ul style="list-style-type: none"> <li>Submitter favours management as an objective rather than minimising adverse effects as this provides for a more considered, holistic approach.</li> </ul>
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Oppose	Delete Policy 4.5.1, or amend to focus solely on hazardous substances.	<ul style="list-style-type: none"> <li>Submitter supports the intent to avoid discharges that are objectionable or offensive to takata whenua and the wider community.</li> <li>In practice there are practical limitations around the extent to which farmers can ensure stock do not discharge waste.</li> <li>As written the policy sets the regulatory bar exceptionally low and may regulate what are both individually and cumulatively relatively insignificant matters without regard to the costs or issues that would likely arise from implementation of the policy.</li> <li>There is no degree of significance.</li> </ul>
169	Management of adverse effects	Policy 4.5.2 - Applying an adaptive management approach	Support	Adopt Policy 4.5.2 as proposed.	<ul style="list-style-type: none"> <li>It is important that regulation applies an adaptive management approach to address adverse effects that may arise.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> <li>From both the regulator's and the resource user's perspective it is necessary to have appropriate indicators and thresholds.</li> </ul>
171	Management of adverse effects	Policy 4.5.4 - Minimising soil erosion	Support	Adopt Policy 4.5.4 as proposed.	<ul style="list-style-type: none"> <li>It is appropriate to minimise soil erosion where this results from particular activities.</li> </ul>
172	Management of adverse effects	Policy 4.5.5 - Controlling the introduction and spread of pest plants and animals	Support	Adopt Policy 4.5.5 as proposed.	<ul style="list-style-type: none"> <li>Pest species can significantly impact the wellbeing of Otago's communities</li> <li>It is necessary to control the adverse effects of pest species, prevent their introduction and reduce their spread.</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Delete Clause a) with the subsequent clauses renumbered accordingly.	<ul style="list-style-type: none"> <li>Submitter agrees with the intentions to enable offsetting of adverse effects on indigenous biodiversity values.</li> <li>Clause a) adds unnecessary criteria.</li> <li>Where the criteria under (b) and (c) are met, offsetting should be available to all activities.</li> </ul>
178	Methods	Methods - general	Amend	Amend the RPS to identify matters that are expected to be addressed through resource consent processes pending the preparation of regional and district plans.	<ul style="list-style-type: none"> <li>Submitter supports the submissions made by Fonterra Co-operative Group Limited.</li> </ul>
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	<ul style="list-style-type: none"> <li>Adopt Methods 1.1.1 and 1.1.2 as proposed.</li> <li>Delete Method 1.1.3</li> </ul>	<ul style="list-style-type: none"> <li>Submitter supports the intention to ensure Regional, city and district councils develop processes to establish and maintain effective resource management relationships with Kai Tahu and have regard to Iwi Management Plans.</li> <li>The requirement to consult Kai Tahu in resource management decision-making and implementation goes beyond what is required.</li> <li>This has the potential to place unnecessary costs on resource users, and to create unwieldy resource management implementation.</li> <li>If Methods 1.1.1 and 1.1.2 are implemented correctly Kai Tahu values, rights and interests should be appropriately reflected in regional and district/city council regulation . This renders Method 1.1.3 unnecessary.</li> </ul>
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	Amend as follows: "1.2.2 Identify and protect the values that contribute to their significance; ...	<ul style="list-style-type: none"> <li>Submitter supports the proposal for regional, city and district councils will collaborate with Kai Tahu.</li> <li>Enshrining the requirement to identify and protect values is too directive for a regional policy statement.</li> <li>If the appropriate processes and relationships are in place the decision to protect these values can be made further down the RMA hierarchy.</li> </ul>
199	Method 6 - Research, Monitoring and Reporting	Method 6.2 - Research	Oppose	Delete Method 6.2.2(a)(i)	<ul style="list-style-type: none"> <li>The identification of values should either include consultation with affected communities within each catchment, or the identification of values should not be taken as being representative of the required value identification or setting process.</li> </ul>
207	Method 7 - Strategies and Plans (non-RMA)	Method 7.4 - Pest management strategy	Amend	Rewrite Method 7.4.1 to include reference to the impact pests may have on primary production and primary production activities as a matter for consideration.	<ul style="list-style-type: none"> <li>The pest management strategy should also consider the impact of pests on primary production and primary production activities.</li> </ul>
208	Method 7 - Strategies and Plans (non-RMA)	Method 7.5 - Pan-regional pest management strategy	Support	Adopt Method 7.5.1 as proposed.	<ul style="list-style-type: none"> <li>It is appropriate to develop a joint pest management strategy with neighbouring regions where feasible and where this will enable better pest management outcomes.</li> </ul>
210	Method 8 - Education and Information	Method 8 - Education and Information	Support	Adopt as proposed.	Submitter supports education and information as a method for addressing resource management issues and enabling better resource management outcomes and reducing the potential harm to inhabitants of the region.
215	Method 9 - Funding	Method 9 - Funding	Support	Adopt Method 9.1.1 as proposed.	<ul style="list-style-type: none"> <li>Public access to sites of significance on privately owned land, or services associated with these sites, can create significant direct and indirect (opportunity) costs to those landowners .</li> <li>The provision of funding to reflect these costs and the contribution of</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					landowners is important and welcome.
255	Other comments	Introduction - Overview and the Otago Region	Amend	Amend the introduction to include a more robust discussion around the positive outcomes resulting from resource use and the agricultural sector's contribution to wellbeing in Otago.	The introduction does not provide a sufficiently balanced context.
263	Objectives on Kai Tahu values	Introduction to Objective 1.1	Amend	Amend as follows (or words to similar effect): "A partnership approach, which involves Kai Tahu and elevates <u>appropriately considers</u> their values, rights and interests in decision making processes, enables ..."	<ul style="list-style-type: none"> <li>• Agree with embedding of principles of treaty and takata whenua point of view in the regions policy framework, and the appropriateness of the development of a partnership approach with Kai Tahu.</li> <li>• However, "elevating" values, rights and interests goes significantly beyond the expectations of Te Tiriti o Waitangi and undermines the reasonable expectation that other residents and resource users in the Otago region can both take part in and inform resource management discussions in an effective manner.</li> </ul>
267	Objectives on high quality natural resources	Need 2.2	Amend	Amend the need statement associated with Objective 2.2 as follows (or words to similar effect): "It is a matter of <del>national</del> <u>regional</u> importance to recognise and provide for natural resources systems and processes."	It appears incongruous for a regional policy statement to define what are and are not matters of national importance.
268	Objectives on high quality natural resources	Need 2.3	Amend	Amend the need statement associated with Objective 2.3 as follows (or words to similar effect): "The RMA requires that resources are managed in an integrated way. Integration among interdependent resources, <u>including those which span within resources that span management and administrative unit boundaries</u> , and among different decision-makers will reduce the risk of adverse and unintended consequences arising from a proposal."	Wording could be amended to provide better clarity.
271	Objectives on high quality natural resources	Introduction to Objective 2.3	Amend	Amend narrative to Objective 2.3 as follows (or words to similar effect): "Our resources are interconnected, and <u>while the use of these resources provide for the well-being of the Otago region</u> , the use of one can affect the values of another. Those interconnections are complex, and they are not always reflected in the functions of local authorities, or in the regional, district or city boundaries. <del>An example of this issue is Otago's coastal environment, a highly valued resource at the nexus between land and marine environments that may additionally include freshwater systems. These diverse resources contribute to distinct land- and seascapes and support a corresponding range of ecosystems. For management purposes, the coastal environment is often partitioned into separate management units. Moreover, administration of this complex resource is guided by several statutes that are implemented by multiple authorities.</del> This example illustrates why <u>As a result</u> , the management of natural resources needs to be integrated to ensure that resource management	<ul style="list-style-type: none"> <li>• Better to state the positive outcomes from natural resource systems rather than attempting to identify and protect these.</li> <li>• There is a danger of unnecessary controls.</li> <li>• Submitter supports the integrated management of natural resources, but does not support the protection of natural resources or the placement of additional constraints on their use, particularly without a robust assessment of the issues, options and implications.</li> <li>• The key outcome sought is not consistency, about a reasonable management system. This can include both regulatory approaches and non-regulatory approaches, and may require a more nuanced response at the district planning level.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				decisions are consistent and take <u>appropriate</u> account of the linkages between every part of the environment, <u>where necessary</u> ."	
272	Chapter B3 - Resilience, health and safety	Outcome 3 and introduction	Amend	<ul style="list-style-type: none"> <li>The preamble is rewritten to express the positive outcomes the provisions within the Chapter will work towards.</li> </ul>	The preamble as currently written has an alarmist focus on threats. While there are some potential (biosecurity) threats from imported goods there are also significant economic and social benefits.
278	Objectives on resilience, health and safety	Need 3.6	Amend	<ul style="list-style-type: none"> <li>Amend "Need" for Objective 3.6 as follows (or words to similar effect): "We need to <u>reduce our dependency on fossil fuels encourage sustainable energy use</u> and improve our energy resilience."</li> </ul>	<ul style="list-style-type: none"> <li>Objective 3.6 <ul style="list-style-type: none"> <li>Fossil fuels provide significant economic and social benefits, and these should be factored into any regulatory response to the use of fossil fuels.</li> <li>The 'need' to reduce fossil fuels is market driven, and is largely a non-regulatory concern.</li> <li>Any regulatory intervention should be national, not regional.</li> </ul> </li> </ul>
282	Objectives on resilience, health and safety	Introduction to Objective 3.1	Amend	<ul style="list-style-type: none"> <li>Amend narrative under Objective 3.1</li> </ul>	Submitter supports the comment that there should be sufficient water supply available for a proposed activity but could be rephrased to acknowledge the opportunity for additional water storage needs and <u>appropriate use and allocation of water</u> .
285	Objectives on resilience, health and safety	Introduction to Objective 3.4	Amend	<ul style="list-style-type: none"> <li>Amend narrative under Objective 3.4 as follows: "Some infrastructure is provided by local authorities (such as water supply, waste water and stormwater) , while others are managed by private companies <u>and/or state owned enterprise</u>."</li> </ul>	The detail to the objective should recognise that infrastructure is also provided by state owned enterprise
291	Chapter B4 - Use and enjoyment of natural and built environment	Outcome 4 and introduction	Amend	<ul style="list-style-type: none"> <li>Amend the introduction to Chapter 4 as follows (or words to similar effect): "The use of natural and physical resources underpins economic and community <u>activity wellbeing</u> in Otago. <del>However</del> <u>Due to the importance of these resources to Otago's wellbeing, and</u> the dynamic and <u>highly</u> interconnected nature of the environment the sustainable management of our resources requires consideration of the adverse effects of resource use on the environment and on other resource users."</li> </ul>	<ul style="list-style-type: none"> <li>Submitter supports positive recognition of benefits of natural and physical resources to Otago.</li> <li>The reference to 'highly interconnected' is superfluous and overplays the extent of this interconnectedness.</li> <li>The introduction to this chapter should be better informed by a more comprehensive discussion on the importance of resource use in general, and primary production in particular, in the introduction to the RPS.</li> </ul>
295	Objectives on use and enjoyment of natural and built environment	Need 4.4	Amend	<ul style="list-style-type: none"> <li>Amend "Need" for Objective 4.4 as follows (or words to similar effect): "We need <u>to provide for</u> efficient allocation and use of these resources to <u>maximise enable</u> socio-economic and cultural benefits, as well as sustain environmental wellbeing."</li> </ul>	<ul style="list-style-type: none"> <li>It is not appropriate for the RPS to attempt to define what is 'efficient' allocation, nor to decide how to 'maximise socio-economic' wellbeing.</li> <li>Objective 4.4 would best be met by providing better recognition of the positive outcomes from resource use right across the RPS, particularly within the introduction, and by reducing the content of the RPS to provide for a <u>more enabling regulatory framework</u>.</li> </ul>
301	Objectives on use and enjoyment of natural and built environment	Introduction to Objective 4.5	Amend	<ul style="list-style-type: none"> <li>Amend narrative under Objective 4.5 as follows: "<del>Any u</del> <u>Use of natural or physical resources significantly contributes to the wellbeing of Otago's communities. However, resource use</u> <u>also</u> has the potential to generate adverse effects. It is important to <u>appropriately</u> manage activities to avoid, individually or cumulatively, degrading the quality of Otago's natural environment. This requires the proactive <u>and integrated</u> management of natural resources, <u>and can only be achieved through the integrated management of Otago's natural</u></li> </ul>	<ul style="list-style-type: none"> <li>Need to better recognise the positive outcomes from resource use.</li> <li>As written the statement infers a heavy handed regulatory approach across is the only, best or preferred method of ensuring the natural resources of the region are maintained.</li> <li>There is a critical role for non-regulatory, catchment or resource use level intervention.</li> </ul>

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				resources, and by giving due consideration to both managing adverse effects and maintaining and enhancing environmental values. Resource use can also have adverse effects on other uses or prevent the normal operation of existing uses."	

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3	Overall approach	Whole Regional Policy Statement (overall approach)	Support	Retain all the provisions of the PRPS, except to the extent that specific changes are made in accordance with the relief sought by the submitter.	<ul style="list-style-type: none"> <li>• Sound planning is required to ensure that regionally significant agricultural research facilities such as Invermay are sufficiently recognised, provided for and protected for future generations in terms of key planning documents such as the RPS.</li> <li>• Specific relief is sought in the balance of this submission and any further submission that may be made.</li> <li>• Submitter would accept words to like effect or as otherwise may be required to ensure sustainable management.</li> </ul>
4	Overall approach	Introduction - RPS framework	Oppose	<ul style="list-style-type: none"> <li>• Identify "regionally significant issues" instead of "outcomes".</li> <li>• Include the following as a "regionally significant issue":  <u>"Natural and physical resources need to be effectively and sustainably managed to fully realise the benefits of infrastructure and economic activities for the region's wellbeing (particularly the region's economic wellbeing)."</u> </li> </ul>	<ul style="list-style-type: none"> <li>• The RPS's purpose is to provide an overview of regionally significant issues and the identification of policies and methods to achieve integrated management of natural and physical resources.</li> <li>• None of the four identified "Outcomes" focus on encouraging future economic growth within the Otago Region.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Oppose	Delete Policy 2.1.2	Policy 2.1.2 appears to repeat the matters covered under Policy 2.1.1 so is unnecessary.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Retain clauses (f) and (j). Delete clause (h)	<ul style="list-style-type: none"> <li>• It is prudent to recognise soil values and manage soils to retain soil resources for primary production and maintain highly valued soil resources to sustain farming in Otago.</li> <li>• It is unclear what "other cultural values" relates to given there is no definition, and as a result the term could be interpreted very broadly.</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Support	Retain Policy 2.2.14	It is prudent to identify areas and values of highly valued soils in terms of sustaining farming in Otago.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	<p>Amend as follows:</p> <p>"Protect the values of areas of highly valued soil resources, by: ...</p> <p>d) Recognising that urban expansion may be appropriate due to location and proximity to existing urban development and infrastructure <u>while avoiding reverse sensitivity effects on rural production activities (unless there is no other suitable land available adjacent to existing urban areas);"</u></p> <p>add the following new clauses:</p> <p><u>" e) Avoiding the use of highly valued soils for rural residential purposes unless identified as part of a district growth strategy.</u></p> <p><u>f) Ensuring that land use activities on highly valued soils are consistent with the continued use of such soils in the vicinity for primary production purposes (e.g. there is a functional</u></p>	<ul style="list-style-type: none"> <li>• It is prudent to identify areas and values of highly valued soils in terms of sustaining farming in Otago.</li> <li>• Highly valued soils should generally only used for urban expansion where there is no other suitable land available adjacent to existing urban areas</li> <li>• Reverse sensitivity on "rural production activities" should be a key consideration when selecting and defining new areas for urban expansion.</li> <li>• Policy should provide direction that new rural residential areas avoid locating over highly valued soils.</li> <li>• Policy should better recognise that some "non-farming" rural activities (e.g. agricultural research facilities, rural industries, rural contractors) may have a functional need to be established in rural areas due to their close association with rural resources and primary production activities.</li> </ul>



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				<u>need for the activity to be established in rural areas).</u> "	
62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Amend	Amend as follows: "Apply an integrated management approach to activities in freshwater catchments, by: ... b) Recognising the importance of river morphology, catchment hydrology, natural processes and land cover <u>and the use of water in supporting catchment values; and ..."</u>	Policy should recognise that "water use" is an important value that needs to be provided for within freshwater catchments.
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Support	Retain as notified.	Submitter supports the recognition of the importance of managing the interface between urban and rural areas and the need to reduce pressure on primary production activities.
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Amend as follows: "Manage urban growth and creation of new urban land in a strategic and co-ordinated way, by: ... c) Identifying <u>and defining</u> future growth areas that i. Minimise adverse effects on rural <del>productivity</del> <u>production activities</u> , including <u>reverse sensitivity effects</u> , loss of highly valued soils or creating competing urban demand for water and other resources; and ..."	<ul style="list-style-type: none"> <li>It is prudent to protect highly valued soils, water and other resources in terms of sustaining farming in Otago.</li> <li>There should be reference to avoiding reverse sensitivity effects on "rural production activities".</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Amend	Amend clause c) as follows: "Where urban growth boundaries, as detailed in Schedule 8, or future urban development areas, are needed to control urban expansion, control the release of land within those boundaries or areas, by: ... c) <del>Avoiding</del> <u>Enabling</u> urban development beyond the urban growth boundary or future urban development area <u>only where there is a functional need for the activity to be established in rural areas.</u> "	<ul style="list-style-type: none"> <li>Supports the intention of controlling growth where there are identified urban growth boundaries or future urban development areas.</li> <li>There is currently no definition of "urban" and there is the potential for it to be interpreted in a broad sense.</li> <li>Policy should better recognise that some important "non-farming" rural activities (e.g. agricultural research facilities, rural industries, rural contractors) may have a functional need to be established in rural areas due to their close association with rural resources and primary production activities.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend as follows: "Policy 3.8.3 <u>Managing fragmentation, use and development</u> of rural land Manage subdivision, use and development of rural land, to: a) Avoid development or fragmentation of land which undermines or forecloses the potential of rural land: i. For primary production ( <u>unless there is a functional need for the activity to be established in rural areas</u> ); or ii. In areas identified for future urban uses; or iii. <del>In areas having the potential for future comprehensive residential development; and</del> b) Have particular regard to whether the proposal will result in a loss of the productive potential of highly <u>valued versatile soils</u> , unless: i. <u>There is a functional need for the activity to be established in a rural area; or</u> ii. <u>The land is required for urban expansion and adjoins an existing urban area and there is no</u>	<ul style="list-style-type: none"> <li>The policy is broader than the title suggests as it covers "subdivision, use and development of rural land".</li> <li>Submitter generally supports the policy as it will assist with sustaining primary production activities and requires the avoidance of reverse sensitivity effects on "rural productive activities"</li> <li>Reference to "rural production activities" ensures consistency with other changes sought.</li> <li>Some important "non-farming" rural activities (e.g. agricultural research facilities, rural industries, rural contractors) have a functional need to be established in rural areas due to their close association with rural resources and primary production activities, potentially including land containing highly versatile soil.</li> <li>Clause (a)(iii) can be deleted as it is open to interpretation and is adequately covered by clause (a)(ii).</li> <li>Clauses b) and b)ii are currently restricted to "highly versatile soils" rather than "highly valued soils" that are the subject of Policy 2.1.5, and need to be amended accordingly</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				other land suitable for urban expansion; and iii. There highly <u>valued versatile</u> soils are needed for urban expansion, <u>and</u> any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and <del>iii</del> iv. Reverse sensitivity effects on rural <u>productive</u> activities can be avoided; ... "	
130	Hazardous substances and waste	Policy 3.9.1 - Integrating management of hazardous substances and waste	Support	Retain as notified.	An integrated approach will reduce the potential for duplication of regulatory provisions arising between regional and district plans and those set out under HSNO.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend Clause f) as follows: "f) Restricting the location of activities that may result in reverse sensitivity effects near: i. Authorised facilities for hazardous substance <u>use, storage,</u> treatment or disposal; ...	Amendment is required to protect activities that use or store hazardous substances, rather than just those which just treat or dispose of them.
135	Hazardous substances and waste	Policy 3.9.6 - Encouraging use of best management practices for hazardous substance use	Amend	Amend Policy 3.9.6 as follows: "Encourage the use of best management practices to prevent or mitigate adverse effects of the use of hazardous substances on the environment, <del>including reducing their use.</del> "	<ul style="list-style-type: none"> <li>• Oppose the requirement to reduce the use of hazardous substances.</li> <li>• Hazardous substance use is a critical component of submitter's research facilities and any expansion or future development of such facilities could require an increase in the use of hazardous substances. The policy as currently written could unnecessarily restrict development.</li> </ul>
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for economic production	Support	Retain as notified	<ul style="list-style-type: none"> <li>• Submitter supports the objective of protecting existing businesses from reverse sensitivity effects arising from the establishment of incompatible activities.</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	<ul style="list-style-type: none"> <li>• Amend as follows: "a) Enabling farming and other rural activities that support the rural economy <u>and have a functional need to locate in rural areas;</u> and b) Minimising the loss of soils highly valued for their versatility for primary production <u>unless required for rural activities that have a functional need to locate in rural areas;</u> and • Retain clauses c) and d)</li> </ul>	<ul style="list-style-type: none"> <li>• It is prudent to manage activities in rural areas and protect highly valued soils to sustain farming in Otago.</li> <li>• Submitter supports clause c) which places restrictions on activities that may lead to reverse sensitivity effects, and clause d) which aims to minimise the subdivision of productive rural land.</li> <li>• Policy should recognise that some important "non-farming" rural activities (e.g. agricultural research facilities, rural industries, rural contractors) may have a functional need to be established in rural areas or on rural land that contains soils highly valued for primary production due, to their close association with rural resources and primary production activities .</li> </ul>
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Support	Retain as notified	<ul style="list-style-type: none"> <li>• No reason given.</li> </ul>
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Oppose	Delete Method 2.3	<ul style="list-style-type: none"> <li>• Method refers to potential to extinguish existing use rights</li> <li>• No indication as to where in the Proposed RPS such an approach might be required or justified .</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Oppose	Delete Method 3.1.3	<ul style="list-style-type: none"> <li>• The Te Rununga o Ngai Tahu Hazardous Substances and New Organisms Policy Statement 2008 has been developed as a tool to assist with assessing ERMA applications for hazardous substances and new substances, so does not need to be referenced in the Proposed RPS.</li> </ul>
192	Method 4 - City and District Plans	Method 4 - City and District Plans	Amend	Add new method: "City or district plans may implement Policies 2.1.5, 2.2.15, 3.8.3 and 4.3.1 by establishing provisions for rural areas that: (a) restrict subdivision, use and development of highly valued soil resources for future use by rural production activities (unless required for a rural activity that has a functional need to	<ul style="list-style-type: none"> <li>• Currently no Methods specifically dealing with issues of fragmentation of rural land, reverse sensitivity in rural areas and retention of highly valued soils in the rural areas beyond urban growth areas.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				locate in rural areas); and (b) avoid reverse sensitivity effects between incompatible activities."	
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	<ul style="list-style-type: none"> <li>Amend Method 4.1.12 as follows: "4.1.12 City or district plans may implement Policies 2.2.15, 3.8.1, 3.8.2 and 3.8.3 by: a. Establishing urban growth boundaries where required to manage pressure for urban development <u>while avoiding high value soils and reverse sensitivity effects on rural production activities (unless there is no other suitable land available adjacent to existing urban areas; ..."</u></li> </ul>	<ul style="list-style-type: none"> <li>Method should be expanded to cover Policies 2.2.15, 3.8.1, 3.8.3 which deal with urban growth and to ensure there is consideration of avoiding high value soils and reverse sensitivity.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Support	Retain Method 6.1.3(c).	<ul style="list-style-type: none"> <li>It is prudent to identify highly valued soils for protection purposes in terms of sustaining farming industry in Otago.</li> </ul>
199	Method 6 - Research, Monitoring and Reporting	Method 6.2 - Research	Amend	Amend Method 6.2.1(d)(ii) as follows: "d) Investigate and provide guidance on: i. The inventory and mapping of Otago's soil resources; ii. The location and extent of <u>highly valued soils and highly class and versatile soils</u> in Otago; ..."	<ul style="list-style-type: none"> <li>It is prudent to identify highly valued soils for protection purposes in terms of sustaining farming industry in Otago.</li> <li>Method it needs to cover the mapping of both "highly valued soils" and "highly versatile soils" to ensure implementation of policies .</li> </ul>
249	Glossaries	Glossary	Amend	Include the following definition for "rural production activities": "Rural land use activities that rely on the productive capacity of land or have a functional need for a rural location such as agriculture, pastoral farming, dairying, poultry farming, pig farming, horticulture, forestry, quarrying and mining. Also included in this definition are processing and research facilities that directly service or support those rural land use activities."	<ul style="list-style-type: none"> <li>Submitter has sought changes to various provisions so that "rural production activities" are recognised, provided for and protected in rural areas, and seeks an appropriate definition.</li> </ul>
249	Glossaries	Glossary	Amend	Include the following definition for "contaminated land": "Land that has a hazardous substance in or on it that- (a) has significant adverse effects on the environment; or (b) is reasonably likely to have significant adverse effects on the environment."	<ul style="list-style-type: none"> <li>The term "contaminated land" is used in various provisions but is currently undefined in the RPS. To enable appropriate and consistent interpretation, the same definition as set out in Section 2 of the RMA should be used.</li> <li>The definition used in Section 2 of the RMA ensures that the term "contaminated land" relates to circumstances that would give rise to significant adverse effects and avoids concern that Policy 2.1.5 could be interpreted to require that any contamination of soil is avoided.</li> <li>As a result of not defining the term, the policy could potentially prohibit the release of any type or level of contaminant, regardless of the level of adverse environmental effects.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	Where specific relief is provided, the submitter would accept words to like effect or as otherwise may be required to ensure sustainable management.	No reason given.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
6	Overall approach	Schedule 3 - Significance threshold	Support	Retain as notified.	Schedule 3 is a helpful tool for determining the significance of adverse effects.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend as follows: "Recognise freshwater values, and manage	<ul style="list-style-type: none"> <li>As written the policy gives effects to Objectives A1, A2 and B1 of the NPSFM 2014, Objective 1 and Policy 21 of the NZCPS 2010, the NES</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				freshwater, to: a) <del>Support</del> <u>Maintain and enhance</u> healthy ecosystems in all Otago aquifers, and rivers, lakes, wetlands, and their margins; and ... g) Maintain or enhance coastal values, where <del>supported by freshwater is associated with those values; and ...</del>	for Sources of Drinking Water and Section 14(3)(b) of the RMA. • Supports the management of the effects resulting from declining water quality or quantity, predation on migratory fish species, and land uses adjacent to waterways on rare and threatened non-migratory galaxias fish. • Requires rewording to clarify the intent of giving effect to Policy 4(c) of the NZCPS 2010.
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Support	Retain as notified.	As written the policy is consistent with Section 6(a) of the RMA.
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend as follows: "Recognise coastal water values, and manage coastal water, to: a) <del>Support</del> <u>maintain and enhance</u> healthy coastal ecosystems <del>and habitats; an</del> ... c) <del>Maintain or enhance coastal values</del> <u>natural character and natural landscapes and features of the coastal environment; and</u> ."	• As written the policy gives effects to Objective 1 and Policies 12, 21 and 23 of the NZCPS 2010. • Coastal values should be clarified to provide more detail on which coastal values might be relevant if not covered by other clauses of this policy.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Support	Retain as notified	Provides for the important function of soil in managing good water quality.
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend as follows: "Recognise the values of ecosystems and indigenous biodiversity, and manage ecosystems and indigenous biodiversity <u>of the terrestrial, freshwater and marine environments,</u> to: ..."	• It is unclear whether this policy is exclusive to management of ecosystems and indigenous biodiversity in a terrestrial context. • Policies 2.1.1, 2.1.2 and 2.1.3 all have a purpose for maintaining ecosystem health and indigenous biodiversity. • This policy should be amended to clarify that it covers terrestrial, freshwater and marine ecosystems and indigenous biodiversity.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Support	Retain as notified.	• The attributes of natural features and landscapes listed in this policy are consistent with those listed in Policy 15 of the NZCPS 2010. • It is recommended that these attributes of natural features and landscapes are taken into account when identifying outstanding and high natural character of the coastal environment as directed by proposed Policy 2.2.3 and proposed Method 6.1.2c).
39	Natural resource value management - general	Policy 2.1.8 - Recognising the values of natural character in the coastal environment	Support	Retain as notified.	• The attributes of coastal natural features listed in this policy are consistent with those listed in Policy 13 of the NZCPS 2010. • It is recommended that these attributes are taken into account when identifying outstanding and high natural character of the coastal environment as directed by proposed Policy 2.2.8 and proposed Method 6.1.2b).
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Support	Retain as notified.	No reason given.
42	Highly valued natural resources - indigenous biodiversity	Policy 2.2.1 - Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend Policy 2.2.1 to provide for a new schedule providing criteria for determining the significance of biodiversity in the marine environment as follows: "Identify areas and values of significant indigenous vegetation and significant habitats of indigenous fauna <u>of terrestrial, freshwater, and marine environments,</u> using the attributes detailed in Schedule 5 <u>and Schedule 5A.</u> "	• A clear regional approach to the identification of significant indigenous vegetation and significant habitats for indigenous fauna is fundamental to providing for the protection of these as required in Section 6(c) of the RMA. • The criteria for the identification of significant indigenous biodiversity detailed in Schedule 5 are supported, subject to proposed amendments, as criteria for determining the significance of indigenous biodiversity in terrestrial and freshwater environment. • Separate criteria are appropriate for the coastal marine area as the criteria in Schedule 5 are not applicable to indigenous biodiversity in the coastal marine area
43	Highly valued natural resources -	Schedule 5 - Criteria for the	Amend	Amend as follows:	• Under the criteria for representativeness it would also be important

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	indigenous biodiversity	assessment of significant indigenous vegetation and habitat of indigenous fauna		"Representativeness: An area that is an example of an indigenous vegetation type or habitat that is representative of that which formerly covered the Ecological District. <u>This may include degraded examples of their type or represent all that remains of indigenous biodiversity in some areas.</u> "	to provide for modified examples where these are the best examples of their habitat type. • Most habitats will have some form of disturbance or modification usually resulting from the influence of human activity.
43	Highly valued natural resources - indigenous biodiversity	Schedule 5 - Criteria for the assessment of significant indigenous vegetation and habitat of indigenous fauna	Amend	<p>Include the following new schedule 5A:  <u>" Criteria for the identification of indigenous vegetation and habitats of indigenous fauna of Otago's coastal marine area.</u>  <u>Identify areas of significant indigenous vegetation and the significant habitats of indigenous fauna in coastal marine area using one or more of criteria a - f</u>  <u>Criteria a - e are to be applied first, with criterion f applied finally: to identify gaps in representation across marine habitats and ecosystems, and to identify best examples of each habitat or ecosystem.</u></p> <p><u>CRITERIA</u>  <u>a. RECOGNISED INTERNATIONAL OR NATIONAL SIGNIFICANCE</u>  <u>i. if it is an area identified as internationally or nationally significant for either indigenous marine ecosystems or biodiversity, or with reference to the species that utilise these ecosystems</u>  <u>b. THREAT STATUS AND RARITY:</u>  <u>SUB-CRITERIA</u>  <u>i. It is a habitat that is required to provide for the life cycle of a marine plant or animal that is locally rare and has been assessed under the New Zealand Threat Classification System (NZTCS), and determined to have a national ' At Risk' conservation status of Naturally Uncommon, Relict, Recovering and Declining.</u>  <u>OR</u>  <u>ii. It is a habitat that is required to provide for the life cycle of a plant or animal that occurs naturally in Otago and has been assessed as having a regional threatened conservation status including Regionally Critical, Endangered and Vulnerable and Serious and Gradual Decline OR</u>  <u>iii. It is a habitat that is required to provide for the life cycle of a plant or animal that occurs naturally in Otago and has been assessed by a nationally or internationally recognised assessment process (e.g. NZTCS, IUCN) and determined to have a threatened conservation status including Critical, Endangered, or Vulnerable. OR</u>  <u>iv. It is a habitat that occurs naturally in Otago and is required to provide for the life cycle of a</u></p>	• The new schedule is required to give effect to Section 6c) of the RMA and Policy 11 of the NZCPS 2010

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				<p><u>marine animal that is listed as a Protected Species in Schedule 7A of the Wildlife Act (1953);OR</u></p> <p><u>v. It is an indigenous marine habitat or ecosystem that occurs naturally in Otago and has been assessed by the regional council or other national assessment process to be threatened based on evidence and expert advice. OR</u></p> <p><u>vi. It is an indigenous vegetation or habitat of indigenous fauna that occurs within an indigenous coastal ecosystem as identified in NZCPS Policy I b(iii) as being particularly vulnerable to modification.</u></p> <p><u>c. UNIQUENESS OR DISTINCTIVENESS: SUB-CRITERIA</u></p> <p><u>i. It is habitat for a marine plant or animal that is endemic or near-endemic to the Otago region OR</u></p> <p><u>ii. It is an indigenous ecosystem that is endemic to the Otago region or supports ecological assemblages, structural form or unusual combinations of species that are endemic to the Otago region. OR</u></p> <p><u>iii. It is a habitat that supports occurrences of a plant, animal or fungi that are the largest specimen or largest population of the indigenous species in Otago or New Zealand</u></p> <p><u>d. DIVERSITY: SUB-CRITERIA</u></p> <p><u>i. It is an intact habitat sequence extending across an environmental gradient, and including both floral and faunal habitat components; OR</u></p> <p><u>ii. It includes a large number of intertidal and/or subtidal habitats. OR</u></p> <p><u>iii. It is a habitat type that supports a high species richness for its type.</u></p> <p><u>e. STEPPING STONES, BUFFERS AND MIGRATION PATHWAYS: SUB-CRITERIA</u></p> <p><u>i. It is a site which makes an important contribution to the resilience and ecological integrity of surrounding areas. OR</u></p> <p><u>ii. It is part of a network of sites that cumulatively provide important habitat for indigenous fauna or when aggregated make an important contribution to ecological function and integrity; OR</u></p> <p><u>iii. It is an example of an indigenous ecosystem, or habitat of indigenous fauna that is used by key species permanently or intermittent for an essential part of their life cycle, including migratory pathways, roosting or feeding areas; OR</u></p> <p><u>iv. It is an example of an ecosystem, indigenous vegetation or habitat of indigenous fauna, that is</u></p>	

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				<p><u>immediately adjacent to, and provides protection for, indigenous biodiversity in an existing protected natural area (established for the purposes of biodiversity protection for either terrestrial or marine protection) or an area identified as significant under the ' threat status and rarity' or 'uniqueness' criteria.</u></p> <p><u>f. REPRESENTATIVENESS:</u> <u>SUB-CRITERIA</u></p> <p><u>i. It is an example of an indigenous marine ecosystem (including both intertidal and subtidal habitats, and including both fauna and floral components) that makes up part of at least 10% of the natural extent of each of Otago's original marine ecosystem types and reflecting the environmental gradients of the region; AND</u></p> <p><u>ii. It is an example of an indigenous marine ecosystem, or habitat of indigenous marine fauna (including both intertidal and subtidal habitats, and including both fauna and floral components that is characteristic or typical of the natural marine ecosystem diversity of the Otago region; OR</u></p> <p><u>iii. It is a habitat that is important to indigenous species of Otago, either seasonally or permanently, including for migratory species and species at different stages of their life cycle (and including refuges from predation, or key habitat for feeding, breeding, spawning, roosting, resting, or haul out areas for marine mammals); OR</u></p> <p><u>iv. It is an ecosystem that contains an intact ecological sequence across an environmental gradient (e.g. intact intertidal vegetation sequence including seagrass, saltmarsh, and terrestrial coastal vegetation); OR</u></p> <p><u>v. It is an ecosystem that contains a large number of marine habitat types, with the full range of habitats represented that is typical for that depth and exposure within the Otago region; OR</u></p> <p><u>vi. It is a habitat or ecosystem of particular importance for indigenous or migratory species."</u></p>	
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	<p>Amend as follows: Policy 2.2.2 Managing significant indigenous vegetation and significant habitats of indigenous fauna</p> <p>Amend as follows: "d) Remediating, when adverse effects on other values cannot be avoided; and e) Mitigating where adverse effects on other values cannot be avoided or remediated; and f) Offsetting in accordance with Policy XX (New Policy XX Biodiversity Offsets – as detailed below) where adverse effects cannot be</p>	<ul style="list-style-type: none"> <li>• Policy is consistent with Section 6(c) of the RMA.</li> <li>• Amendment recommended to include biodiversity offsets in the mitigation hierarchy, which will be consistent with similar policies in the Proposed RPS.</li> </ul>

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				<del>avoided, remedied or mitigated; and</del> g) f Encouraging enhancement of those areas and values."	
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Support	Retain as notified.	<ul style="list-style-type: none"> <li>• This policy defers the identification of outstanding natural features, landscapes, and seascapes of the coastal environment supported by proposed method 6.1.2 c). This is an appropriate response to Policy 15 of the NZCPS 2010.</li> <li>• The attributes listed in Schedule 4 are considered to be consistent with those detailed in Policy 15(c) of the NZCPS.</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "a) Avoiding adverse effects of <u>subdivision, use and development on the characteristics and qualities of these values</u> which contribute to the <u>significance of the natural features, landscapes or seascapes</u> ; and b) Avoiding <u>significant adverse effects and avoiding, remedying or mitigating other adverse effects of subdivision, use and development on other values of natural features, landscapes and seascapes; ...</u> "	<ul style="list-style-type: none"> <li>• Amendments required to ensure consistency with Policy 15(a) and (b) of the NZCPS 2010.</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Support	Retain as notified.	No reason given.
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Support	Retain as notified	No reason given.
49	Highly valued natural resources - the coastal environment	Policy 2.2.7 - Identifying the landward extent of the coastal environment	Amend	<ul style="list-style-type: none"> <li>• Amend as follows: " <u>c) Land areas at risk from coastal hazards; and ...</u>"</li> <li>• Renumber accordingly</li> </ul>	<ul style="list-style-type: none"> <li>• Policy is consistent with Policy 1 of NZCPS 2010.</li> <li>• It is appropriate that this policy covers identifying the landward extent as opposed to the extent generally. Method 6.1.1 provides for a collaborative process between councils in identifying the coastal environment which is supported.</li> <li>• Areas potentially affected by coastal hazards are an indicator of the extent of the coastal environment.</li> </ul>
50	Highly valued natural resources - the coastal environment	Policy 2.2.8 - Identifying areas of high and outstanding natural character in the coastal environment	Support	Retain as notified.	<ul style="list-style-type: none"> <li>• The policy defers the identification of natural character of the coastal environment supported by proposed method 6.1.2 b). This is supported as an appropriate response to Policy 13 of the NZCPS 2010.</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend as follows: "a) Avoiding adverse effects of <u>subdivision, use and development on the characteristics and qualities of these values</u> which contribute to the outstanding natural character of an area; and b) Avoiding significant adverse effects of <u>subdivision, use and development on the characteristics and qualities of these values</u> which contribute to the high natural character <u>values of an area; ...</u> "	<ul style="list-style-type: none"> <li>• As written the policy is generally supported as it is generally consistent with Policy 13 of the NZCPS 2010.</li> <li>• Amendments are recommended to better align with Policy 13 of NZCPS 2010.</li> </ul>
52	Highly valued natural resources - the coastal environment	Policy 2.2.10 - Identifying surf breaks of national importance	Support	Retain as notified.	<ul style="list-style-type: none"> <li>• There is no regional plan method specific to this policy so it is assumed it may be captured by the general method 3.1.</li> <li>• It is uncertain whether the intention is to identify further surf breaks of national importance or just to recognise the ones already identified in the NZCPS 2010.</li> </ul>
53	Highly valued natural resources - the coastal environment	Policy 2.2.11 - Managing surf breaks of national importance	Support	Retain as notified.	<ul style="list-style-type: none"> <li>• This policy and its associated method 4.1.6 give effect to Policy 16 of the NZCPS 2010.</li> </ul>
54	Highly valued natural resources -	Policy 2.2.12 - Identifying	Amend	Amend as follows:	<ul style="list-style-type: none"> <li>• This policy generally reflects the definition of outstanding water</li> </ul>



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	outstanding water bodies	outstanding water bodies and wetlands		" Identifying <u>wetlands and</u> outstanding water bodies <u>and wetlands.</u> "	bodies in the NPSFM 2014. • Suggested amendment clarifies that all wetlands should be identified not only those that meet and 'outstanding' threshold.
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend as follows: "Policy 2.2.13 Managing <u>wetlands and</u> outstanding water bodies <u>and wetlands</u> "	Proposed amendment ensures that the Policy gives effect to Objectives A2(a) and A2(b), and Objective B4 of the NPSFM 2014.
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend as follows: " Natural resource systems and their interdependencies are recognised <u>and managed in an integrated manner</u> "	It is recommended to amend this objective to include that integrated management of natural resources is provided for as this is the intent of the following policies.
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Support	Retain as proposed.	No reason given.
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Support	Retain as notified	No reason given.
62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Support	Retain as notified.	Provides for the coordinated management of freshwater and land use to enable freshwater and water body values to be maintained.
63	Natural systems and interdependencies	Policy 2.3.4 - Applying an integrated management approach for the coastal environment	Amend	Amend as follows: "b) Coordinating the management of land use, freshwater, and coastal water, to: i. Maintain or enhance coastal values <u>including water quality and marine and coastal ecosystems;</u> and ii. Reduce the potential for health and nuisance effects; <u>and</u> iii. <u>Provide for access to public open space to and along the coast; and</u> iv. <u>Avoid increased risk of coastal hazards.</u> "	• As written the policy provides for the intent of Policy 4 of NZCPS 2010 • It is recommended to include a provision for the integrated management of land use that may affect public access to the coast or that may increase coastal hazard risk.
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Amend as follows: "Risk that natural hazards pose to Otago's communities are <u>minimised</u> <u>reduced and not increased</u> "	The suggested amendment ensures better alignment of the objective with the explanation and the intent of the objective, which will also provide consistency with Policies 25 and 27 of the NZCPS 2010 with regard to hazards in the coastal environment.
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Combine with Policy 3.2.2 by amending 3.2.1 as follows: "Identify natural hazards that may adversely affect Otago's communities, including hazards of low likelihood and high consequence. <u>Assess the likelihood of natural hazard events occurring, having regard to a timeframe of no less than 100 years, including by considering:</u> a) <u>Hazard type and characteristics;</u> b) <u>Multiple and cascading hazards;</u> c) <u>Cumulative effects, including from multiple hazards with different risks;</u> d) <u>Effects of climate change including sea level rise and coastal erosion;</u> e) <u>Using the best available information for calculating likelihood;</u> f) <u>Exacerbating factors.</u> "	• This policy should be combined with Policy 3.2.2 as assessing the natural hazard likelihood or risk is part of the process of identifying natural hazards. • Considering the effects of sea level rise will provide consistency with Policy 24 of the NZCPS 2010.
82	Natural hazard risk	Policy 3.2.2 - Assessing natural hazard likelihood	Oppose	Delete Policy 3.2.2 and include in Policy 3.2.1	This policy is supported in part but should be combined with Policy 3.2.1 as assessing the natural hazard likelihood or risk is part of the process of identifying natural hazards.

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86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Avoid increasing natural hazard risk, including by: a) Avoiding activities that significantly increase risk, including displacement of risk off-site; ..."	With the exception of the word 'significantly' the policy is considered consistent with Policy 25 and 27 of the NZCPS 2010.
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Support	Retain as notified.	As written policy is consistent with Policy 25 and 27 of the NZCPS 2010 in providing for a reduction in coastal hazard risk.
88	Natural hazard risk	Policy 3.2.8 - Applying a precautionary approach	Support	Retain as notified	The policy reflects good resource management practice.
89	Natural hazard risk	Policy 3.2.9 - Protecting features and systems that provide hazard mitigation	Support	Retain as notified	<ul style="list-style-type: none"> <li>Protection of natural defences against coastal hazards is very important, as is restoration or enhancement of these features which may also be required to maintain the functioning of these natural systems.</li> <li>Implementing this policy would give effect to Policy 26 of the NZCPS 2010.</li> </ul>
90	Natural hazard risk	Policy 3.2.10 - Mitigating natural hazards	Support	Retain as notified	Policy is consistent with the intent of Policy 25(e) of the NZCPS 2010, discouraging hard protection and promoting the use of alternative means of reducing the risk of coastal hazards.
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) <u>Long-term sustainable risk reduction approaches have first been considered; and</u> b) There is significant public or environmental benefit in doing so; or b) <u>The work relates to the functioning ability of an existing lifeline utility, or facility for essential or emergency services; and</u> d) <u>Considering the form and location of the interventions the adverse effects on the coastal environment are minimised.</u> "	Policy 27 of the NZCPS 2010 promotes investigation of strategies for protecting significant existing development from coastal hazard risk. The policy recognises that in certain situations the placement of hard protection structures is the only practical means of protecting existing essential infrastructure. It is important that where hard coastal structures are necessary any adverse effects on the coastal environment should be minimised.
92	Objectives on resilience, health and safety	Objective 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Support	Retain as notified.	No reason given
94	Climate change	Policy 3.3.1 - Adapting to, or mitigating the effects of, sea level rise	Support	Retain as notified.	Policy 3.3.1 is supported as it is consistent with Policy 24 of the NZCPS 2010.
95	Climate change	Policy 3.3.2 - Adapting to, or mitigating the effects of, climate change	Support	Retain as notified.	Policy is consistent with the intent of Policy 3 of the NZCPS 2010.
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Support	Retain as notified	<ul style="list-style-type: none"> <li>Supported so far as it proposes to manage any adverse effect on Otago's natural resources resulting from infrastructure of national or regional importance.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend as follows: "Minimise adverse effects from infrastructure that has national or regional significance, by: ... e) <del>Considering</del> <u>Requiring</u> the use of offsetting, or other compensatory measures, <del>to manage</del> <u>significant</u> residual adverse effects on indigenous biodiversity."	<ul style="list-style-type: none"> <li>Policy 3.5.2 is supported in part. As written e) weakens the intent of biodiversity offsets by only requiring them to be considered in relation to these important values and areas.</li> <li>Reference to other compensatory methods is too general and will likely result in offsets not been used as they should be.</li> <li>Suggested amendment provides a stronger policy and sets clear expectations.</li> </ul>
115	Objectives on resilience, health and safety	Objective 3.7 - Urban areas are well designed, sustainable and	Support	Retain as notified.	Objective supports biodiversity initiatives and enhancements within urban environments to minimise adverse effects of urban

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		reflect local character			development.
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	Amend as follows: "b Ensure that the built form relates well to its natural environment, including by: i. <del>Reflecting</del> <u>Retaining or enhancing</u> natural features such as rivers, lakes, wetlands and topography; and ii. <u>Providing for or enhancing existing</u> ecological corridors in urban areas; and iii. <u>Protecting or enhancing existing</u> areas of indigenous biodiversity and habitat for indigenous fauna; and iv. Encouraging use of low impact design techniques; and v. Encouraging construction of warmer buildings; ..."	<ul style="list-style-type: none"> <li>• Supports the integration and enhancement of the natural environment within urban areas.</li> <li>• Suggested amendments ensure the policy will better serve biodiversity.</li> </ul>
119	Urban design	Policy 3.7.2 - Encouraging use of low impact design techniques	Support	Retain as notified	<ul style="list-style-type: none"> <li>• Supports the enhancement of habitat for indigenous species and other biodiversity values generally.</li> </ul>
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Amend	Amend as follows: Objective 3.8 Urban growth is well designed and integrates effectively with adjoining urban, <u>coastal</u> and rural environments	<ul style="list-style-type: none"> <li>• The objective should aim to effectively design and integrate urban growth with any adjoining coastal environment.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Amend as follows: "c) Identifying future growth areas that: ... <u>v. Avoid identified areas of the coastal environment where subdivision, use and development are deemed to be inappropriate; ...</u> "	<ul style="list-style-type: none"> <li>• Policy 7 of the NZCPS 2010 requires the identification of areas in the coastal environment where subdivision, use and development are or may be inappropriate and provide protection through objectives, policies and rules.</li> <li>• Amendment is proposed to give effect to Policy 7 of the NZCPS 2010 and to give effect to the recommended change to Objective 3.8.</li> </ul>
144	Objectives on use and enjoyment of natural and built environment	Objective 4.1 - Public access to areas of value to the community is maintained or enhanced	Support	Retain as notified	Objective is consistent with Policy 19 of the NZCPS 2010.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Support	Retain as notified	Policy is consistent with Policy 19 of the NZCPS 2010 and with Section 6(d) of the RMA.
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: "Objective 4.2 Historic heritage resources are recognised and <u>protected, and continue to</u> contribute to the region's character and sense of identity"	<ul style="list-style-type: none"> <li>• Suggested amendment assists with clarifying that the protection of significant historic heritage is intended by the objective and will ensure consistency with Policy 17 of the NZCPS 2010.</li> <li>• The use of common criteria for the identification of historic features of national and regional significance is supported.</li> </ul>
150	Historic heritage	Policy 4.2.2 - Identifying historic heritage	Support	Retain as notified	<ul style="list-style-type: none"> <li>• The criteria specified in this policy are supported.</li> <li>• The use of common criteria for the identification of historic features of national and regional significance is supported.</li> </ul>
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Support	Retain as notified.	No reason given.
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Amend	Amend as follows: "Manage land use change in dry catchments, to avoid any significant reduction in water yield, by: a) Restricting any extension of forestry activities within those catchments that would result in a significant reduction in water yield, including <u>cumulative reductions and managing potential for wilding tree spread; ...</u> "	<ul style="list-style-type: none"> <li>• The policy recognises the ecosystem service provided by tussock grasslands in maintaining water quantity in certain catchments.</li> <li>• The policy requires specific mention of the role wilding conifers spread plays in reducing water yields in dry catchments.</li> <li>• It is important that the spread of wilding conifers is not exacerbated by inappropriate planting of tree species with wilding potential.</li> <li>• The proposed amendment to this policy provides greater recognition of this issue.</li> </ul>
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and	Support	Retain as notified	<ul style="list-style-type: none"> <li>• Policy is supported as it promotes the avoidance of locating the activities in areas of significant indigenous biodiversity and significant habitats of indigenous fauna or areas of outstanding natural character,</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		processing			outstanding landscapes and natural features, and outstanding water bodies.
161	Objectives on use and enjoyment of natural and built environment	Objective 4.4 - Otago's communities can make the most of the natural and built resources available for use	Amend	Amend as follows: "Objective 4.4 Otago's communities can <del>benefit make the most of from environmental wellbeing resulting from sustainable use of the natural and built resources available for use.</del> "	<ul style="list-style-type: none"> <li>• Amendment recommended to clarify that resource use needs to be sustainable.</li> </ul>
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Support	Retain as notified.	<ul style="list-style-type: none"> <li>• Supported as an important mechanism for achieving Objectives B2 and B3 of the NPSFM 2014.</li> </ul>
165	Making the most of available resources	Policy 4.4.3 - Encouraging environmental enhancement	Amend	Amend as follows: "Encourage activities which contribute to enhancing the natural environment, including to: a) Improve water quality where it is in a <u>degraded state</u> ; or b) Protect or restore <u>or regenerate indigenous species and</u> habitat for indigenous species; or c) <u>Regenerate indigenous species</u> <del>improve the quality of sites of importance for food gathering or harvesting; ...</del> "	An amendment to this policy is recognised to be consistent with Policy 21 of the NZCPS. The policy should encourage the enhancement of water quality of the coastal environment, and in particular in coastal or water bodies where water quality has deteriorated to where it is having an adverse effect on existing uses and natural values.
166	Objectives on use and enjoyment of natural and built environment	Objective 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Amend	Amend as follows: "Adverse effects of using and enjoying Otago's natural and built environment are <u>avoided or</u> minimised"	Need for greater emphasis to be placed on the avoidance of adverse effects in order to be consistent with the objectives associated policies, and to give effect to higher level policy documents.
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Support	Retain as notified.	As written the Policy is consistent with Policy 23(2) of the NZCPS 2010
172	Management of adverse effects	Policy 4.5.5 - Controlling the introduction and spread of pest plants and animals	Amend	Amend as follows: "Control the adverse effects of pest species, prevent their introduction and reduce their spread, to safeguard: ... c) <u>Water quality and quantity; or ...</u> "	<ul style="list-style-type: none"> <li>• It should be recognised that water quantity as well as water quality can be impacted by the introduction and spread of pest plants.</li> <li>• Wilding conifers are a particular example of pest weed species that can impact on water quantity.</li> </ul>
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by: ... g) <del>Considering</del> <u>Require</u> the use of offsetting, or <del>compensatory measures</del> , for residual adverse effect ..."	<ul style="list-style-type: none"> <li>• Clause g) weakens the intent of biodiversity offsets by only requiring them to be considered.</li> <li>• Reference to other compensatory methods is too general and will likely result in offsets not been used as they should be.</li> <li>• Suggested amendments provide a stronger policy and sets clear expectations.</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Replace policy 4.5.7 and policy 4.5.8 with one new policy 4.5.7 as follows: "Manage the effects of activities on indigenous biodiversity by: a) avoiding as far as practicable, and where total avoidance is not practicable, minimising adverse effects on indigenous biodiversity b) requiring remediation where adverse effects cannot be avoided c) requiring mitigation where adverse effects on the areas identified above cannot be avoided or remediated d) requiring any significant residual adverse effects to indigenous biodiversity meeting the significance criteria detailed in Schedule 5 to be offset through protection, restoration and enhancement actions that achieve no net loss and preferably a net gain in indigenous	<ul style="list-style-type: none"> <li>• Generally supports the inclusion of policies providing for biodiversity offsets.</li> <li>• Policies 4.5.7 and 4.5.8 would better serve biodiversity if they required offsetting rather than just enabling it to occur. This is particularly the case where an activity would adversely affect significant biodiversity.</li> <li>• Where biodiversity is not significant then to enable offsetting may be appropriate. This recognises the high investment required for offsetting and that some residual effects may not warrant that investment, although others forms of compensation or management that do not meet the offsetting standard may still be appropriate.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				biodiversity values having particular regard to Schedule XX [on biodiversity offsetting] or: e) enabling any significant residual adverse effects to indigenous biodiversity that does not meet the significance criteria detailed in Schedule 5 to be offset through projection, restoration and enhancement actions that achieve no net loss and preferably; a net gain in indigenous biodiversity values having particular regard to Schedule XX [on biodiversity offsetting]."	
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Oppose	<p>Include the following new schedule:</p> <p>"Schedule XX Biodiversity Offsetting The following sets out a framework for the use of biodiversity offsets. It should be read in conjunction with the NZ government Guidance on Good Practice Biodiversity Offsetting in New Zealand. August 2014 (or any successor document):</p> <ol style="list-style-type: none"> <li>1. Restoration, enhancement and protection actions will only be considered a biodiversity offset where they are used to offset the anticipated residual effects of activities after appropriate avoidance, minimisation, remediation and mitigation actions have occurred as per the policies in B4.3.4, i.e. not in situations where they are used to mitigate the adverse effects of activities.</li> <li>2. Restoration, enhancement and protection actions undertaken as a biodiversity offset are demonstrably additional to what otherwise would occur, including that there are additional to any remediation or mitigation undertaken in relation to the adverse effects of the activity.</li> <li>3. Offset actions should be undertaken close to the location of development, where this will result in the best ecological outcome.</li> <li>4. The values to be lost through the activity to which the offset applies are counterbalanced by the proposed offsetting activity which is at least commensurate with the adverse effects on indigenous biodiversity, so that the overall result is no net loss, and preferably a net gain in ecological values.</li> <li>5. The offset is applied so that the ecological values being achieved through the offset are the same or similar to those being lost.</li> <li>6. As far as practicable, the positive ecological outcomes of the offset last at least as long as the impact of the activity and preferably in perpetuity. Adaptive management responses should be incorporated into the design of the offset, as required to ensure that the positive ecological outcomes are maintained over time.</li> <li>7. The biodiversity offset should be designed</li> </ol>	A new schedule is required to set out a framework and principles for biodiversity offsets as referred to in suggested new policy 4.5.7 which replaces current proposed policies 4.5.7 and 4.5.8.

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				and implemented in a landscape context - i.e. with an understanding of both the donor and recipient sites role, or potential role in the ecological context of the area. 8. The consent application identifies the intention to utilise an offset, and includes a biodiversity offset management plan that: i. sets out baseline information on indigenous biodiversity that is potentially impacted by the proposal at both the donor and recipient sites ii. demonstrates how the requirements set out in this appendix will be addressed, iii. identifies the monitoring approach that will be used to demonstrate how the matters set out in this appendix have been addressed, over an appropriate timeframe. (While this appendix sets out a framework for the use of biodiversity offsets in Otago, many of the concepts are also applicable to mitigation actions i. e. where an overall outcome of no net loss (and preferably a net gain) in biodiversity values cannot be ensured but restoration and protection actions will be undertaken.)"	
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Oppose	Delete the Policy and replace with new Policy 4.5.7	<ul style="list-style-type: none"> <li>• The addition of "if practicable" in clause d) weakens the intent of an offset.</li> <li>• The offset should last at least as long as the impact and preferable in perpetuity.</li> <li>• The proposed relief would replace current policy with new Policy 4.5.7.</li> </ul>
177	Roles and responsibilities	Roles and responsibilities	Amend	Amend Roles and Responsibilities as follows: <ul style="list-style-type: none"> <li>• Regional council will: "Specify objectives, policies and methods <u>in regional plans</u> for the control of the use of land for: ..."</li> <li>• City and district councils will: "Specify objectives, policies and methods <u>in district plans</u> for the control of the use of land for: ..."</li> </ul> <p>c. The maintenance of indigenous biological diversity on all land outside of the coastal marine area and the beds of rivers and lakes and wetlands."</p>	<ul style="list-style-type: none"> <li>• It would be more appropriate for regional council functions to be included under Method 3 and for district council functions to be included under Method 4.</li> <li>• An amendment to point c) in relation to District Plans is recommended to clarify the intent of the policy.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.5 as follows: <ul style="list-style-type: none"> <li>• Regional Plan will set objectives, policies and methods to implement policy 2.1.2 and 2.3.3 <u>including</u> by developing river management strategies <u>which</u>, <u>including</u> recommendations on: a. The management of riparian margins along rivers and lakes <u>and wetlands</u>; ..."</li> </ul>	No reason given.
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Include a new Method 3.1.6 as follows: <ul style="list-style-type: none"> <li>• Regional Plan will set objectives, policies and methods to implement Policy 2.2.9 to <u>manage the effects of activities to be located in the coastal marine area on areas of natural character of the coastal environment identified</u></li> </ul>	A new method is required to implement proposed Policy 2.2.9 regarding natural character, and manage the effects of activities within the coastal marine area on areas of natural high or outstanding natural character in regional plans.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				through the implementation of Policy 2.2.8 and associated Method 6.1.2."	
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	<ul style="list-style-type: none"> <li>Amend as follows:               <ul style="list-style-type: none"> <li>"4.1.4 City or district plans will implement Policy 4.3.2 by including provisions managing land use in dry catchments <u>and any potential for spread of wilding trees</u> where this will impact on water yield; ...</li> <li>Include new method as follows:                   <ul style="list-style-type: none"> <li>"4.1.13 Regional Plan will set objectives, policies and methods to implement Policy 2.2.9 to manage the effects of activities on areas of natural character of the coastal environment identified through the implementation of Policy 2.2.8 and associated Method 6.1.2."</li> </ul> </li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>4.1.4 - District plans also need to consider the potential for spread of wilding tree species.</li> <li>New method 4.1.13 is required to give effect to proposed Policy 2.2.9 regarding natural character and provided for in Method 6.1.2 b).</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend 4.2 as follows: "4.2.7 City or district councils may implement Policy 1.2.4 and 4.1.1 by including conditions <u>in rules in district plans and/or resource consents</u> to maintain or enhance access to the natural environment or sites of cultural significance."	<ul style="list-style-type: none"> <li>Implementation of this method will give effect to Policy 19 of the NZCPS.</li> <li>This method seems to be incomplete and needs amending to state that conditions may be included in rules in district plans to maintain public access.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	<ul style="list-style-type: none"> <li>Retain Method 6.1.1 as notified.</li> <li>Amend Method 6.1.2 as follows:               <ul style="list-style-type: none"> <li>"Regional, city and district councils, in their areas of responsibility, will identify:                   <ul style="list-style-type: none"> <li>a. Significant indigenous vegetation and significant habitat of indigenous fauna <u>of the terrestrial, freshwater and marine environment</u>;</li> <li>b. Areas of outstanding <u>and high</u> natural character in the coastal environment;</li> <li>c. Outstanding natural features, and outstanding natural landscapes and seascapes;</li> <li>d. Special amenity landscapes <u>and highly valued natural features</u>;</li> <li>e. <u>Wetlands and Outstanding water bodies</u>; ..."</li> </ul> </li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Method 6.1.1 is supported as it, in association with Policy 2.2.7, gives effect to Policy 1 of the NZCPS 2010.</li> <li>It is important to clarify that the identification of areas of significant indigenous vegetation and significant habitat of indigenous fauna is required for each of the terrestrial, freshwater and marine environments.</li> <li>Gives effect to Policy 1 of the NZCPS 2010. However, only focussing on sites of outstanding natural character will not give effect to Policy 13 of the NZCPS 2010.</li> <li>Requiring the identification of areas of the coastal environment with high natural character is consistent with the intent shown by proposed Policy 2.2.8.</li> <li>An amendment is recommended to 6.1.2 d) to implement policy 2.2.5 with regard to highly valued natural features.</li> <li>Method 6.1.2 e) should include the identification of wetlands in order to meet the requirements under the NPSFM 2014.</li> </ul>
239	Anticipated Environmental Results	AER 3.4 - Adverse effects on highly-valued resource values from nationally and regionally significant infrastructure are avoided or mitigated	Amend	Amend as follows: AER 3.4 Adverse effects on Otago's outstanding and highly-valued natural and physical resource values from nationally and regionally significant infrastructure are avoided, <u>remedied</u> , or mitigated <u>or offset</u> .	Suggested amendment ensures the AER reflects the full hierarchy and end with biodiversity offset.
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>Include the following definition of 'biodiversity offsetting' as follows:               <ul style="list-style-type: none"> <li>"Measurable conservation outcomes resulting from actions designed to compensate for significant residual adverse biodiversity impacts arising from project development after appropriate avoidance, minimisation, remediation and mitigation measures have been taken. The goal of biodiversity offsetting is to achieve no net loss and preferably a net gain of biodiversity on the ground."</li> </ul> </li> <li>Include definition of "no net loss" as follows:</li> </ul>	<ul style="list-style-type: none"> <li>A new definition for biodiversity offsetting is required as it is referred to in new Policy 4.5.7</li> <li>Include definition of "no net loss" as follows:               <ul style="list-style-type: none"> <li>"No overall reduction in biodiversity as measured by type, amount and condition."</li> </ul> </li> </ul>

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				"No overall reduction in biodiversity as measured by type, amount and condition."	
258	Other comments	Consequential amendments & other amendments providing relief	Amend	Further, consequential or alternative relief to like effect to that sought in specific submissions.	To ensure the Proposed RPS: <ul style="list-style-type: none"> <li>• gives effect to the NZCPS,</li> <li>• promotes sustainable management of natural and physical resources,</li> <li>• recognises and provides for matters of national importance listed in s6 and has particular regard to other matters in s7 of the RMA,</li> <li>• the changes are necessary, appropriate and sound resource management practice.</li> </ul>
269	Objectives on high quality natural resources	Introduction to Objective 2.1	Amend	Amend narrative under Objective 2.1 as follows: "Some of the many values of our natural resources may conflict with each other: for example, we depend on water for food production, yet we want water for healthy rivers. Otago's biodiversity is an example of another resource under pressure, <u>in part as a direct result of land use change and intensification such as development of irrigation, and</u> in part from indirect consequences of land use, such as the introduction and spread of pest species. ..."	Explanation needs to recognise that biodiversity is under significant pressure of decline as a direct result of continuing land use change and intensification.

### 118 Otago and Central South Island Fish and Game Councils

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Whole Regional Policy Statement (general support)	Support	Support.	Overall support for the proposed RPS, and particularly the following aspects of the proposed RPS: <ul style="list-style-type: none"> <li>• The use of the word "avoid" in objectives and policies.</li> <li>• The continued recognition of the importance of Otago's freshwater values and rivers.</li> <li>• The recognition of the value of water yield characteristics of tussock grasslands and the threats to this value in dry catchments</li> </ul>
3	Overall approach	Whole Regional Policy Statement (overall approach)	Did not specify	Ensure RPS is consistent with the Otago Sports Fish and Gamebird Management Plan.	Lack of regard to the Otago Sports Fish and Gamebird Management Plan, prepared under the Conservation Act 1987.
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Insert a list of regionally significant resource management issues in Part A, as follows: " <u>Regionally Significant Resource Management Issues</u> <u>Issue 1: Cumulative effects of human activities on natural resources, including the overallocation and degradation of freshwater resources.</u> <u>Issue 2: Managing complex interconnections between natural resources.</u> <u>Issue 3: Incorporating tangata whenua values in resource management decisions.</u> <u>Issue 4: Spreading of pest species.</u> <u>Issue 4A: The loss of biodiversity, including indigenous biodiversity.</u> <u>Issue 4B: The loss and degradation of wetlands.</u> <u>Issue 5: Vulnerability to natural hazards.</u> <u>Issue 6: Adapting to climate change.</u> <u>Issue 7: Responding to fuel and energy constraints.</u> "	<ul style="list-style-type: none"> <li>• RMA Section 62(1)(a) requires that that the RPS states the significant resource management issues for that region.</li> <li>• The proposed RPS states those issues in individual chapters, which makes it difficult for an overview to be obtained.</li> <li>• Issues have been redrafted to: <ul style="list-style-type: none"> <li>• state the obvious major issue facing Otago, which is the overallocation and degradation of freshwater resources.</li> <li>• give effect to objective B2 of the NPS Freshwater Management 2014.</li> <li>• place a priority on the loss of biodiversity.</li> <li>• state that the ongoing loss and degradation of wetlands in Otago remains an issue.</li> <li>• cover both the energy supply situation, regulations and restrictions that may be placed on their use, and any demand issues that result from economic factors</li> <li>• fix spelling mistakes.</li> </ul> </li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
4	Overall approach	Introduction - RPS framework	Amend	Amend the description of "Otago has high quality natural resources and ecosystems" (p.11) as follows: <u>"Otago's natural resources are valued for their intrinsic values, and whilst Society relies heavily on the systems and services of the natural environment, the recognition, protection, and sustainable management of the intrinsic values of natural resources and their ecosystems is paramount.</u> This chapter addresses ... rely on having a <del>great</del> high quality environment..."	The amended text takes greater account of Part II matters including intrinsic values and the need for their protection and sustainable management.
4	Overall approach	Introduction - RPS framework	Amend	Amend the description of "Communities are resilient, safe and healthy" (p.11) as follows: "This chapter deals with our response and ability to be resilient to resource limitations or constraints, shock events, system disruptions, natural hazards, and climate change..."	Spelling.
4	Overall approach	Introduction - RPS framework	Amend	Amend the section "How to read the RPS" (p.12) as follows:"... Under each policy there is reference to relevant methods. These methods and regional, city and district council roles and responsibilities <u>and responsibilities of other organisations are detailed in Part C...</u> "	Suggested amendment gives effect to the addition of Method 7.7 for fisheries management that is sought by the submitter.
6	Overall approach	Schedule 3 - Significance threshold	Amend	Include methods or guidelines as to how the matters interact and will be weighed.	<ul style="list-style-type: none"> <li>• General support for Schedule 3, with minor amendment, as it promotes transparency of decision-making.</li> <li>• As proposed the Schedule introduces uncertainty.</li> </ul>
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	Amend as follows: " <del>Degradation of the values and of natural systems risks loss of complexity, which in turn jeopardises the life sustaining</del> <u>supporting</u> capacity of the environment, and the ecosystem services provided by this environment to the community..."	<ul style="list-style-type: none"> <li>• Suggested amendment better reflects wording of RMA S5.</li> <li>• Current issue statement is difficult to understand.</li> </ul>
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend as follows: "Objective 2.1 The value <u>and life-supporting capacity</u> of Otago's natural and physical resources are recognised, maintained and enhanced, <u>or restored where they were degraded or lost.</u> "	<ul style="list-style-type: none"> <li>• Suggested amendment better reflects RMA S5.</li> <li>• A course of action is needed where values are degraded or lost.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend as follows: "Recognise freshwater values, and manage freshwater, to: a) <del>Support</del> <u>Maintain and enhance</u> healthy ecosystems in all Otago aquifers, and rivers, lakes, wetlands, and their margins <u>and restore unhealthy ecosystems</u> ; and ... d) Protect migratory patterns of freshwater species, <u>including the habitat of trout and salmon</u> , unless detrimental to indigenous biodiversity; and ... f) <u>Phase out the over-allocation of freshwater that has negative effects on water quality and instream flows by 2035; and ...</u> i) <del>Retain</del> <u>Maintain or enhance</u> the quality and reliability of existing drinking water supplies;	<ul style="list-style-type: none"> <li>• The word "support" is not clear on meaning.</li> <li>• Suggested amendments better reflect RMA Section 7(h) and Section CA of the NPS Freshwater Management (2014).</li> <li>• Suggested amendments are consistent with proposed reinsertion of the regionally significant resource management issues to the RPS.</li> <li>• Some drinking water supplies suffer from poor or declining water quality. For those supplies it is more appropriate to "maintain or enhance" the quality of water.</li> <li>• All recreation values associated with freshwater should be recognised in the RPS. It is not clear how an importance test is to be used without criteria.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				and ... l) <del>Protect important</del> recreation values; and ..."	
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ... d) Maintain ecosystem health and indigenous biodiversity <u>and where it has been degraded restore or enhance it</u> ; and ... l) Maintain bank stability; <u>and</u> m) <u>Maintain or enhance riparian vegetation</u> ; and n) <u>Ensure recreational access.</u> "	<ul style="list-style-type: none"> <li>• Need to provide for degraded ecosystems and indigenous biodiversity and indigenous biodiversity to be restored or enhanced.</li> <li>• As written, the policy ignores the positive and beneficial effects of riparian vegetation.</li> <li>• Need to protect access for recreational users.</li> </ul>
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend as follows: "Recognise coastal water values, and manage coastal water, to: a) <u>Maintain or enhance</u> Support healthy coastal ecosystems; and ... c) Protect migratory patterns of coastal water species, <u>including the habitats of trout and salmon</u> , unless detrimental to indigenous biodiversity; and ... h) <del>Protect important</del> recreation values; and ."	<ul style="list-style-type: none"> <li>• The word "support" is not clear on meaning.</li> <li>• Suggested amendments better reflect RMA Section 7(h).</li> <li>• All recreation values associated with coastal water should be recognised in the RPS. It is not clear how an importance test is to be used without criteria.</li> </ul>
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Add the following clause: " <u>m) Avoid human or animal-induced sediment runoff.</u> "	<ul style="list-style-type: none"> <li>• As written the list of policy items does not include any mention of preventable erosion.</li> <li>• Rule 12.C.0.3 of the Regional Plan: Water justifies a similar policy in the RPS.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend as follows: "Policy 2.1.6 Managing for ecosystem and <del>indigenous</del> biodiversity values Recognise the values of ecosystems and <del>indigenous</del> biodiversity, and manage <u>adverse and cumulative effects on</u> ecosystems and <del>indigenous</del> biodiversity, to: ... d) <del>Protect important</del> hydrological services, including the services provided by tussock grassland; and ... f) Maintain habitats of <u>species, including</u> indigenous species that are important for recreational, commercial, cultural or customary purposes; and ..."	<ul style="list-style-type: none"> <li>• Emphasis on importance of indigenous species ignores the reality (recreational fisheries are based on trout and salmon) and RMA Section 7(h).</li> <li>• To stop degradation or loss of ecosystems and indigenous biodiversity it is necessary to manage adverse and cumulative effects, not the systems themselves.</li> </ul>
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Amend	<ul style="list-style-type: none"> <li>• Include methods or guidelines as to how the matters interact and will be weighed.</li> <li>• Add "d) Recreational values and use." to "3. Associative attributes".</li> </ul>	<ul style="list-style-type: none"> <li>• As proposed the Schedule introduces uncertainty.</li> <li>• Recreational values and use is an important component in the identification of natural features and landscapes.</li> </ul>
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Amend	Amend as follows: "Objective 2.2 Otago's significant and highly valued natural resources are identified, and protected or enhanced to	States the reason for identifying, protecting, or enhancing significant or highly valued resources.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				maintain their distinctiveness and significance"	
54	Highly valued natural resources - outstanding water bodies	Policy 2.2.12 - Identifying outstanding water bodies and wetlands	Amend	Amend as follows: "Identify outstanding water bodies and wetlands and their <u>amenity or intrinsic</u> values, using the following criteria: a) A high degree of naturalness; b) Outstanding aesthetic or landscape values; <u>b1) Outstanding amenity or intrinsic values which are afforded by waters in their natural state;</u> <u>b2) Where waters are no longer in their natural state, the amenity or intrinsic values of those waters which in themselves warrant protection because they are considered outstanding;</u> <u>b3) Outstanding habitat for terrestrial or aquatic organisms.</u> <u>b4) Outstanding fishery values.</u> <u>b5) Outstanding for its wild, scenic, or other natural characteristics</u> <u>b6) Outstanding scientific or ecological values</u> <u>b7) Outstanding recreational, historical, spiritual, or cultural values and;</u> [c-f unchanged] <u>Meeting one of the above criteria is sufficient to result in a water body being identified as outstanding under Policy 2.2.12 and therefore needing protection under Policy 2.2.13."</u>	<ul style="list-style-type: none"> <li>• The RPS is required to give effect to the RMA and water conservation orders.</li> <li>• As currently written Policy 2.1.12 does not recognise all aspects and values of outstanding water bodies that are listed in Part 9 of the RMA.</li> <li>• Need to be clear on the assessment criteria to meet the outstanding definition.</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend as follows: "Protect the values of outstanding water bodies and wetlands by: ... b) Avoiding, remedying or mitigating other adverse effects, <u>including cumulative effects</u> , on the water body or wetland's values; and ... e) <del>Encouraging</del> <u>Ensuring</u> enhancement of outstanding water bodies and wetlands."	<ul style="list-style-type: none"> <li>• The RPS is required to give effect to the RMA and water conservation orders.</li> <li>• As currently written Policy 2.1.13 does not recognise all aspects and values of outstanding water bodies that are listed in Part 9 of the RMA.</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	Clarify how significance will be determined and how criteria will be balanced / weighed.	Support clauses b) and c)
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	• Amend as follows: "Objective 2.3 Natural systems and interdependencies are recognised, <u>and sustained and restored</u> "	• No reason given.
62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Amend	Ensure freshwater objectives, if assigned, are catchment-based to reflect existing practice, as follows: "Policy 2.3.3 Applying an integrated management approach for freshwater catchments Apply an integrated management approach to activities in freshwater catchments, by: a) Using consistent <u>catchment-based</u> freshwater objectives for interconnected water bodies; and..."	<ul style="list-style-type: none"> <li>• There is a risk that freshwater objectives or freshwater management units are defined in such a way as to allow for degradation in a lower catchment to be masked by higher water quality in the upper reaches, or that multiple water-bodies are aggregated into one interconnected overall unit.</li> <li>• The current approach used by the ORC is to be specific about individual catchments and sub-catchments based on their land-form and hydrology, and this should continue.</li> </ul>
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and	Support	Supports.	No amendments required.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		physical resources recognises environmental constraints			
77	Recognition of environmental constraints	Policy suite 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Support	Supports.	No amendments required.
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Support	Supports.	No amendments required.
80	Natural hazard risk	Policy suite 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Support	Supports.	No amendments required.
92	Objectives on resilience, health and safety	Objective 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Support	No amendments required.	Supports the ORC on determining the likely future effects and consequences of climate change.
93	Climate change	Policy suite 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Support	No amendments required.	Supports the ORC on determining the likely future effects and consequences of climate change.
96	Objectives on resilience, health and safety	Objective 3.4 - Good quality infrastructure and services meet community needs	Support	No amendments required.	Supports the ORC on determining the likely future effects and consequences of climate change.
97	Infrastructure - general	Policy suite 3.4 - Good quality infrastructure and services meet community needs	Support	No amendments required.	Supports the ORC on determining the likely future effects and consequences of climate change.
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend b) as follows: "b) <del>Reduce</del> <u>Avoid, remedy or mitigate</u> adverse effects of those activities, including cumulative adverse effects on natural and physical resources <u>and the environment</u> ; and"	<ul style="list-style-type: none"> <li>As written Policy 3.4.2 could be strengthened to avoid, remedy, or mitigate adverse effects on the environment.</li> <li>Need to make it clear that natural and physical resources also includes the environment.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend e) as follows: "e) Considering the use of offsetting, or other compensatory measures, for residual adverse effects on <u>biodiversity, including indigenous biodiversity.</u> "	As currently written, this policy does not provide for any offsetting or compensatory measures on anything other than indigenous biodiversity.
114	Energy	Policy 3.6.6 - Reducing long term demand for fossil fuels	Amend	Amend as follows: "Policy 3.6.6 <u>Recognise the finite nature of fossil fuels and reduce</u> <del>Reducing long-term</del> demand for fossil fuels <del>Reduce the long-term</del> demand for fossil fuels from Otago's communities, by:..."	<ul style="list-style-type: none"> <li>Suggested amendment provides focus for the challenging task ahead to leave fossil fuels before they leave us.</li> <li>The use of the phrase "long- term" may encourage deferring addressing th problem, where action is required on this issue currently.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Amend c)ii. as follows:"c) ii. Maintain or enhance significant biodiversity, landscape or natural character values, <u>and public access to the coastal marine area, lakes and rivers;</u> and"	<ul style="list-style-type: none"> <li>Necessary to give effect to Section 6(d) of the RMA.</li> <li>Fish and Game's statutory role under Section 26Q(l)(b)(i) of the Conservation Act 1987 is to maintain and improve the sports fish and game resource by maintaining and improving access.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend b)iii. as follows: "b) iii. reverse sensitivity effects on rural productive activities, <u>and other activities located in the area,</u> can be avoided; and".	Traditional rural recreational activities like angling and waterfowl hunting can be affected by reverse sensitivity.
142	Objectives on use and enjoyment of natural and built environment	Issue 4.5 - Adverse effects from the use of Otago's natural and physical resources	Amend	Amend 2nd paragraph as follows: "Otago's <u>ecosystems and significant areas of biodiversity</u> ..."	The current text only refers to components of the environment (biodiversity and outstanding landscapes), rather than the overall ecosystem.
144	Objectives on use and enjoyment of natural and built environment	Objective 4.1 - Public access to areas of value to the community is maintained or enhanced	Support	No changes required.	Supports the recognition of public access at an objective level.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
145	Public access to areas of values	Policy suite 4.1 - Public access to areas of value to the community is maintained or enhanced	Support	No changes required.	Supports the recognition of public access.
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows: "Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling <u>sustainable</u> farming and other rural activities that support the rural economy; and b) <del>Minimising</del> <u>Avoid, remedy or mitigate</u> the loss of soils highly valued for their versatility for primary production; and ..."	<ul style="list-style-type: none"> <li>• Suggested amendment references back Section 5 and the purpose of the RMA.</li> <li>• The term "minimising" is not consistent with the RMA. Avoid, remedy, or mitigate is suggested as a better term.</li> </ul>
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Amend	Amend as follows: "Manage land use change in dry catchments, to avoid <del>any significant</del> reduction in water yield, by: a) [unchanged] b) <del>Minimising</del> <u>Avoid[ing], remedy[ing], or mitigate[ing]</u> the conversion of tussock grasslands to species which are less able to capture and hold precipitation."	<ul style="list-style-type: none"> <li>• The term "minimising" is not consistent with the RMA. Avoid, remedy, or mitigate is suggested as a better term.</li> <li>• It is not clear how significance is to be defined. A significance test is already introduced by defining "dry catchments".</li> <li>• One of the features of conversion of tussock grasslands to pasture or forestry is the cumulative loss of water yield values. The nature of loss of water yield values does not lend itself to significance tests.</li> </ul>
161	Objectives on use and enjoyment of natural and built environment	Objective 4.4 - Otago's communities can make the most of the natural and built resources available for use	Support	Support as written.	No reason given.
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Support	Support.	No reason given.
165	Making the most of available resources	Policy 4.4.3 - Encouraging environmental enhancement	Amend	Amend as follows: "Encourage activities which contribute to enhancing the natural environment, including to: ... b) Protect or restore habitat for <del>indigenous species, including riparian habitats</del> ; or ... e) Restore <del>the natural character of wetlands</del> ; or..."	<ul style="list-style-type: none"> <li>• As currently written, the policy ignores the predominately introduced or exotic vegetation on riparian margins.</li> <li>• The reality of reinstating vegetation in denuded environments is such that introduced species are far more likely to be used.</li> <li>• Environmental restoration is often to restore wetland habitat for introduced species such as gamebirds, and contains a range of introduced and indigenous plants, which are not seen as pests.</li> <li>• Unclear what the difference is between restoring wetlands and restoring the natural character of wetlands; wetland values are far more than just natural character.</li> </ul>
166	Objectives on use and enjoyment of natural and built environment	Objective 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Support	No changes required.	No reason given.
171	Management of adverse effects	Policy 4.5.4 - Minimising soil erosion	Amend	Amend as follows: "Minimise soil erosion resulting from activities, by: ... d) Encouraging activities that enhance soil retention; <u>and</u> e) <u>Buffering land from water.</u> "	Suggested amendment better reflects changes sought to Policy 2.1.5
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend as follows: "Policy 4.5.7 Enabling offsetting of <u>biodiversity</u> , <u>including</u> indigenous biodiversity Enable offsetting of adverse effects on <u>biodiversity</u> , <u>including</u> indigenous biodiversity values, only when:..."	<ul style="list-style-type: none"> <li>• Development activities can cause damage or loss to biodiversity in general, rather than just indigenous biodiversity.</li> <li>• Clause c) seems to refer to all biodiversity, rather than just indigenous biodiversity, so the intent of the policy is not clear.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for	Amend	Amend as follows:	Offsetting includes all values that might have been removed,

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		indigenous biodiversity		"Policy 4.5.8 Offsetting for <u>biodiversity</u> , including indigenous biodiversity Provide for offsetting for <u>biodiversity</u> , including indigenous biodiversity, when it is enabled, by ensuring that: a) The offset achieves no net loss and preferably a net gain in indigenous biodiversity values; and..."	damaged, or degraded from activities elsewhere and which are capable of restoration.
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Amend	Include new method: "2.2.6 Establish protocols and processes for improving consistency with how affected parties are determined on resource consent applications."	Need to address the process and protocols for councils to consistently determine who are affected parties on resource consent applications.
188	Method 3 - Regional Plans	Method 3 - Regional Plans	Support	Support.	No reason given.
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	<ul style="list-style-type: none"> <li>• Add the following to Method 3.1.4: "<u>c1. Set minimum and residual flows and allocation regimes for water quantity, including default flows and allocation regimes, on all rivers in Otago.</u>"</li> <li>• Consider carrying the concept in clause c) through into the policies.</li> </ul>	<ul style="list-style-type: none"> <li>• As written Method 3.1.4 lacks recognition of the primary resource management issue facing Otago: overallocation of water quantity.</li> <li>• Suggested amendment ensures consistency with other amendments sought by the submitter (placing overallocation into the list of regionally significant resource management issues; and proposed amendment to Policy 2.1.1) and reflects that ORC currently has a programme of setting minimum flows</li> <li>• Clause c) encourages restoration of both indigenous and appropriate introduced species.</li> </ul>
192	Method 4 - City and District Plans	Method 4 - City and District Plans	Support	Support.	No reason given.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	<ul style="list-style-type: none"> <li>• Amend 4.1.3 as follows: "4.1.3 City or district plans will implement Policy 4.5.1 by including provisions to <u>control</u> manage the discharge of dust associated with earthworks and land use;"</li> <li>• Amend 4.1.4 as follows: "4.1.4 City or district plans will implement Policy 4.3.2 by including provisions <u>managingcontrolling</u> land use in dry catchments where this will impact on water yield;"</li> </ul>	<ul style="list-style-type: none"> <li>• "Control" is a more specific term than "manage".</li> <li>• Ensures consistency with Section 30(1)(b) and 30(1)(c) of the RMA, which requires territorial local authorities to "control" land use.</li> </ul>
197	Method 6 - Research, Monitoring and Reporting	Method 6 - Research, Monitoring and Reporting	Support	Support.	No reason given.
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend 6.1.2 as follows: "6.1.2 Regional, city and district councils, in their areas of responsibility, will identify: ... <u>g. The values of all water bodies and the ecosystems and habitats that they support.</u> "	<ul style="list-style-type: none"> <li>• This list of values in Method 6.1.2 is less comprehensive than the list of values within the Regional Plan: Water.</li> <li>• Amendment is introduced to avoid a scenario where Schedule 1 of the Water Plan could be amended to become less comprehensive.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Support	Strongly support Method 6.1.3.	No reason given.
199	Method 6 - Research, Monitoring and Reporting	Method 6.2 - Research	Support	Strongly support Method 6.2.2.	No reason given.
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Support	General support.	No reason given.
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Amend	Add the following method to address fisheries management: "7.7 Fisheries management 7.7.1 The regional council will: a. Encourage cooperation and liaison between agencies responsible for fisheries management, these being the relevant Fish and Game Council, the Department of Conservation and	<ul style="list-style-type: none"> <li>• Management of fisheries separated between 3 main agencies (Otago and Central South Island Fish &amp; Game Councils, DoC and the ORC).</li> <li>• Native fish protection requires an active ad innovative approach from all 3 agencies working together.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>iwī groups.</p> <p>b. Encourage cooperation and liaison between the agencies and landowners to ensure that the interactions between native and introduced fish is appropriately managed to ensure sufficient protection is provided to vulnerable native fish."</p>	
207	Method 7 - Strategies and Plans (non-RMA)	Method 7.4 - Pest management strategy	Support	Support this method provided a definition of pest is inserted into this RPS using the definition provided in the Biosecurity Act 1993.	No reason given.
208	Method 7 - Strategies and Plans (non-RMA)	Method 7.5 - Pan-regional pest management strategy	Support	Support this method provided a definition of pest is inserted into this RPS using the definition provided in the Biosecurity Act 1993.	No reason given.
209	Method 7 - Strategies and Plans (non-RMA)	Method 7.6 - Urban Stream Plans	Support	Support Method 7.6.1.	No reason given.
210	Method 8 - Education and Information	Method 8 - Education and Information	Support	General support.	No reason given.
212	Method 8 - Education and Information	Method 8.1.2 - Information from regional council - compulsory	Support	Support.	Method 8.1.2(c)(ii) is an example of effective wording to promote the benefits of both introduced and indigenous vegetation, especially for riparian vegetation to buffer land from water, and to improve freshwater fish habitat.
215	Method 9 - Funding	Method 9 - Funding	Support	General support.	No reason given.
216	Method 10 - Service Provision	Method 10 - Service Provision	Support	General support.	No reason given.
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	<p>Amend Method 11.2.1 as follows:</p> <p>"b. Facilitate the restoration or enhancement of riparian margins, particularly when they:</p> <p>i. Improve the health and resilience of ecosystems supporting indigenous biodiversity;</p> <p>ii. Restore or rehabilitate ecosystems and indigenous biodiversity and natural character;</p> <p>...</p> <p>c. Facilitate initiatives that support:</p> <p>...</p> <p>iv. The protection or restoration of the significant values of wetlands;"...</p>	Notified version inconsistent with the need to maintain and enhance all ecosystems and freshwater habitats.
224	Method 11 - Advocacy and Facilitation	Method 11.2.2 - Facilitation by regional council - compulsory	Amend	<p>Amend Method 11.2.2a) as follows:</p> <p>"a. Facilitate the restoration, rehabilitation or creation of freshwater and coastal habitats, particularly when it:</p> <p>i. Encourages the natural regeneration of habitats, including habitats for indigenous species;</p> <p>ii. Buffers or links ecosystems, habitats and areas of significance that contribute to ecological corridors;</p> <p>iii. Maintains or enhances the provision of indigenous ecosystem services;"</p>	Notified version inconsistent with the need to maintain and enhance all ecosystems and freshwater habitats.
229	Anticipated Environmental Results	AER 2.1 - The extent of, and values of, significant and highly valued natural resources and heritage in Otago are protected or enhanced	Amend	Amend the measure associated to the 1st indicator as follows: "There are public inventory/maps of all outstanding and highly significant natural and physical resources in Otago."	<ul style="list-style-type: none"> <li>• The inventory/maps should not be limited to outstanding and highly significant natural and physical resources.</li> <li>• There should not be any provision in the RPS that would enable Schedule 1 of the Water Plan to become narrower in scope.</li> </ul>
230	Anticipated Environmental Results	AER 2.2 - Otago's water bodies support healthy ecosystems, are safe for swimming, and maintain their natural form and character	Amend	Amend the measure associated to the 4th indicator as follows: "The number, extent, and health of Otago's wetlands is monitored and reported through aA	<ul style="list-style-type: none"> <li>• As written this AER does not anticipate any monitoring of wetlands, does not specify what information would go in that inventory, nor if it extends beyond regionally significant wetlands.</li> <li>• There should be scope for all wetlands to be contained in the public</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				public inventory of Otago's wetlands [which] exists and is maintained and updated"	inventory, not just regionally significant wetlands.
232	Anticipated Environmental Results	AER 2.4 - The quality of Otago's soils is maintained or enhanced	Amend	Amend the measure associated to the 1st indicator as follows: "There is a public inventory of Otago's highly-valued soils at a scale that can inform consent decision-making".	This anticipates less information provision than that which is already provided by growOtago.
233	Anticipated Environmental Results	AER 2.5 - The health and diversity of Otago's ecosystems is maintained or enhanced	Amend	Amend 1st indicator as follows: "The cover area, connectivity, and health of <u>ecosystems</u> , indigenous vegetation and fauna in Otago is maintained or enhanced".	Need to provide for all ecosystems.
239	Anticipated Environmental Results	AER 3.4 - Adverse effects on highly-valued resource values from nationally and regionally significant infrastructure are avoided or mitigated	Amend	Amend indicator as follows: "There is no net loss to the values of Otago's outstanding, significant, or highly valued natural and physical resources resulting from nationally and regionally significant infrastructure".	Where environments are outstanding and highly valued, mitigation is often not an option.
243	Anticipated Environmental Results	AER 4.1 - Otago's coast, lakes and rivers can be accessed by the public	Amend	Amend measures associated to the indicators as follows: <ul style="list-style-type: none"> <li>• 1st indicator: "Guest night records in areas of high value, complaints records, <u>New Zealand Angler Survey data</u>."</li> <li>• 2d indicator: "Consenting decisions, evaluation reports, <u>District Plan esplanade reserve and strip requirements, Department of Conservation marginal strip requirements</u>."</li> </ul>	<ul style="list-style-type: none"> <li>• The New Zealand Angler Survey provides a comprehensive view of visits to lakes and rivers.</li> <li>• An assessment of esplanade and marginal strip requirements in District Plans and conservation management strategies will provide a baseline on the level of protection that is given to riparian margins.</li> </ul>
247	Anticipated Environmental Results	AER 4.5 - The number and severity of environmental issues in Otago is reduced	Amend	Amend 2nd indicator as follows: "Decrease in the number of <u>call-outs/complaints</u> for environmental and nuisance issues."	No reason given.
249	Glossaries	Glossary	Amend	Insert a definition of "pest": "Pest, means an organism specified as a pest in a pest management plan".	<ul style="list-style-type: none"> <li>• Proposed RPS lacks a definition of pest.</li> <li>• Proposed amendment is from the Biosecurity Act 1993.</li> </ul>
253	Other comments	Structure of the document & useability - general	Did not specify	<ul style="list-style-type: none"> <li>• Clearly identify outcomes at the beginning of the proposed chapters.</li> <li>• Clearly label where narratives apply within objectives and policies to ensure that the paragraphs or sentence statements under the objectives and policies are differentiated from the actual objective and policy.</li> </ul>	<ul style="list-style-type: none"> <li>• The "wiring diagram", which determines the structure of the RPS, reverses the RMA hierarchy of issues, objectives, policies, and methods in favour of a more outcome based approach. This new structure and the way it interfaces with District Plans requires more explanation if the proposed RPS is to be given effect in an efficient manner.</li> <li>• Unclear what the "outcomes" referred to in the wiring diagram are within the document.</li> <li>• The objectives often read more as outcomes or issues rather than as traditionally understood objectives.</li> <li>• The status of the sentence below the policy not being clear.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	<ul style="list-style-type: none"> <li>• Any similar relief with like effects which addresses concerns.</li> <li>• Any other consequential amendments which arise from submission or the relief sought.</li> </ul>	No reason given.
266	Objectives on high quality natural resources	Need 2.1	Amend	Amend the "Need" statement associated to Objective 2.1 (p. 24) as follows: <u>"It is a matter of national importance to recognise and provide for natural resources systems and processes.</u> We need to know..."	<ul style="list-style-type: none"> <li>• As proposed the statement in the RPS does not reflect Objective 2.1.</li> <li>• Objectives 2.1 and 2.2 split natural resources into two categories: all resources, and those that are "significant and highly valued". This is contrary to section 6(a) of the Act, which does not make this distinction for the coastal environment, wetlands, lakes, and rivers.</li> <li>• The addition of the description from Objective 2.2 - "Need", is necessary which states that these matters are of national importance.</li> </ul>
278	Objectives on resilience, health and safety	Need 3.6	Amend	Amend "Need" statement under Objective 3.6 (p. 45) as follows:	Suggested amendment provides focus for the challenging task ahead to leave fossil fuels before they leave us.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				"We need to <u>recognise the finite nature of fossil fuels, and</u> reduce our dependency on fossil fuels, and improve our energy resilience."	
282	Objectives on resilience, health and safety	Introduction to Objective 3.1	Amend	Amend introduction to Objective 3.1 (p. 47) as follows: "As a community, we are highly dependent on the resources available to us. When undertaking activities it is therefore important to consider the environmental context we operate within and develop accordingly <u>based on that underlying environmental reality</u> . For example, there should be sufficient water supply available for a proposed activity."	The suggested amendment strengthens the overall intent of the objective narrative.
287	Objectives on resilience, health and safety	Introduction to Objective 3.6	Amend	Amend the last paragraph of the narrative under Objective 3.6 (p. 61) as follows: "In particular, Otago's reliance on fossil-based transport fuels could be reduced in the medium to long term through <u>more efficient or alternative transport fuels and system redesign</u> ."	<ul style="list-style-type: none"> <li>Fossil fuels are a very efficient energy source.</li> <li>Better to simply refer to alternative transport fuels (that will most likely be less efficient in technical sense) and the system redesign necessary to cope with new fuels and energy sources.</li> </ul>
292	Objectives on use and enjoyment of natural and built environment	Need 4.1	Amend	Amend "Need" statement under Objective 4.1 (p. 76) as follows: "... We need to use the opportunities subdivision and development create, to improve access to Otago's natural environment, or, <u>in rare circumstances, such as around ports</u> , to limit access to more sensitive places."	<ul style="list-style-type: none"> <li>The current wording implies that access restrictions might become more common.</li> <li>Suggested amendment explains where access restrictions are traditionally used.</li> </ul>
296	Objectives on use and enjoyment of natural and built environment	Need 4.5	Amend	Amend "Need" statement under Objective 4.5 (p. 77) as follows: "It is important to avoid effects that, individually or cumulatively, degrade Otago's natural <u>ecosystems</u> and built environment, where possible."	The current text only refers to components of the environment (biodiversity and outstanding landscapes), rather than the overall ecosystem.

### 119 Ian Percy and Fiona Aitken, Ian Percy and Fiona Aitken Family Trust and Aitken's Folly Vineyard

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	<ul style="list-style-type: none"> <li>Support the protection of high quality soils by avoiding significant adverse effects on highly valued soil resources.</li> <li>Oppose the policy's recognition that urban expansion may be appropriate in some high value soil areas.</li> </ul>	<ul style="list-style-type: none"> <li>Concerned about reverse sensitivity effects on any neighbours from their productive rural activities, for example use of frost fans and helicopters.</li> <li>Wish to see objectives and policies in the proposed RPS that explicitly recognise and provide for reverse sensitivity, protection productive land from sensitive land use activity and direct the separation of land use activities to avoid land use conflicts.</li> </ul>
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Amend	Strengthen this Objective to protect surrounding productive land, rather than simply reducing pressure on that land.	<ul style="list-style-type: none"> <li>Operate a vineyard in Wanaka.</li> <li>Are concerned to protect the productive capacity of their land and the residential amenity enjoyed there.</li> <li>Are concerned about reverse sensitivity effects on neighbours from their productive rural activities.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Support	Support Policy 3.8.1(c)(i) and (e).	<ul style="list-style-type: none"> <li>Highly valued soils should not be lost to future urban growth.</li> <li>Support the protection of productive land.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Strengthen the Policy by requiring avoidance of reverse sensitivity effects on rural productive activities.	<ul style="list-style-type: none"> <li>Support the protection of land used for productive purposes from future urban use and the explicit recognition of reverse sensitivity effects.</li> <li>Policy should be amended to ensure that land use conflicts cannot arise.</li> </ul>
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for economic production	Support	Support.	No reason given

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend (c) to ensure that reverse sensitivity effects require avoidance, not restriction.	<ul style="list-style-type: none"> <li>Operate a vineyard in Wanaka.</li> <li>Are concerned about reverse sensitivity effects on neighbours from their productive rural activities.</li> </ul>
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	Amend (c) to ensure that reverse sensitivity effects require avoidance, not restriction.	<ul style="list-style-type: none"> <li>Operate a vineyard in Wanaka.</li> <li>Are concerned about reverse sensitivity effects on neighbours from their productive rural activities.</li> </ul>

## 120 Heritage New Zealand Pouhere Taonga

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Whole Regional Policy Statement (general support)	Support	Support the intention to update the heritage provisions of the RPS to better reflect amendments to the RMA, including the elevation of the "protection of historic heritage from inappropriate subdivision, use and development", and the "relationship of Maori and their culture and traditions with their ancestral lands, water, sites, wahi tapu and other Taonga", to matters of national importance.	Reflects amendments to the Resource Management Act (RMA) that have occurred since the operative RPS was adopted.
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Support	Adopt.	<ul style="list-style-type: none"> <li>Supports the emphasis on more effective recognition of Kai Tahu values in resource management. Heritage values are considered to be an intrinsic aspect of Kai Tahu cultural values.</li> <li>It can be difficult for decision makers to take cultural values into consideration where these values are not properly understood or identified. The PRPS goes some way to identifying values of importance to Kai Tahu, however there is a need for the regional council and territorial authorities to go further in identifying and recognising important values so that these can be appropriately managed and provided for.</li> </ul>
19	Kai Tahu values, rights, interests and customary resources	Policy 1.2.2 - Recognising important sites of cultural significance to Kai Tahu	Support	Adopt.	<ul style="list-style-type: none"> <li>Supports the emphasis on more effective recognition of Kai Tahu values in resource management. Heritage values are considered to be an intrinsic aspect of Kai Tahu cultural values.</li> <li>It can be difficult for decision makers to take cultural values into consideration where these values are not properly understood or identified. The PRPS goes some way to identifying values of importance to Kai Tahu, however there is a need for the regional council and territorial authorities to go further in identifying and recognising important values so that these can be appropriately managed and provided for.</li> </ul>
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Support	Adopt.	<ul style="list-style-type: none"> <li>Supports the emphasis on more effective recognition of Kai Tahu values in resource management. Heritage values are considered to be an intrinsic aspect of Kai Tahu cultural values.</li> <li>It can be difficult for decision makers to take cultural values into consideration where these values are not properly understood or identified. The PRPS goes some way to identifying values of importance to Kai Tahu, however there is a need for the regional council and territorial authorities to go further in identifying and recognising important values so that these can be appropriately managed and provided for.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Add the following clause: " <u>m) Ensure that historic heritage values are appropriately protected.</u> "	River, lake and wetland margins can hold historic heritage material, often associated with Kai Tahu occupation. Sometimes such values are suspected but their extent may be unknown, or they can be previously unknown and only discovered during works within a waterway margin. It is important to ensure that such values are managed appropriately.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Support	Adopt Policy 2.1.5(i).	<ul style="list-style-type: none"> <li>The policy appropriately recognises the potential for the presence of subsurface archaeological and cultural material, and acknowledges that soils need to be carefully managed to protect these values.</li> <li>The policy provides for sections 6(e) &amp; 6(f) of the RMA.</li> </ul>
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Support	Adopt Policy 2.1.7(c)(ii)-(iii).	<ul style="list-style-type: none"> <li>Historic heritage features can have a formative and legible influence on natural landscape, particularly in terms of the interaction of natural resources and layers of human activity.</li> <li>Cultural values attached to the physical landscape may seem less tangible, but are intrinsic to Kai Tahu identity and are also widely accepted.</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Support	Adopt.	<ul style="list-style-type: none"> <li>Identification of outstanding natural features, landscapes and seascapes will enable these to be specifically provided for in planning documents and resource management processes.</li> <li>This provides clarity for all parties with a relationship with these places and enable more effective management to occur.</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Support	Adopt.	<ul style="list-style-type: none"> <li>Identification of outstanding natural features, landscapes and seascapes will enable these to be specifically provided for in planning documents and resource management processes.</li> <li>This provides clarity for all parties with a relationship with these places and enable more effective management to occur.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Add the following clause to Policy 3.5.2 a): " <u>v. Where there are significant historic heritage values</u> ".	<ul style="list-style-type: none"> <li>Construction of new infrastructure has the potential to adversely affect heritage values, particularly archaeological and cultural heritage values.</li> <li>The protection of historic heritage from inappropriate subdivision, use and development is a matter of national importance pursuant to section 6(f) of the RMA.</li> <li>It is appropriate for the risk to these resources from infrastructure development to be acknowledged.</li> </ul>
115	Objectives on resilience, health and safety	Objective 3.7 - Urban areas are well designed, sustainable and reflect local character	Support	Adopt.	<p>Supports the general direction the provision sets out:</p> <ul style="list-style-type: none"> <li>The role of heritage as a cornerstone aspect of successful urban development is acknowledged, and provision is made for heritage and cultural values to be integrated into urban subdivision and development.</li> <li>It is acknowledged that urban growth does have the potential to adversely affect important heritage values and settings where these are not identified and integrated into design.</li> <li>Integration of heritage values and settings into design is an important means of protecting heritage values consistent with RMA S6(f).</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Support	Adopt Policy 3.7.1(e).	<p>Supports the general direction the provision sets out:</p> <ul style="list-style-type: none"> <li>The role of heritage as a cornerstone aspect of successful urban development is acknowledged, and provision is made for heritage and cultural values to be integrated into urban subdivision and development.</li> <li>It is acknowledged that urban growth does have the potential to adversely affect important heritage values and settings where these are not identified and integrated into design.</li> <li>Integration of heritage values and settings into design is an important means of protecting heritage values consistent with RMA S6(f).</li> </ul>
118	Urban design	Schedule 6 - Urban form and design	Support	Adopt.	<p>Supports the general direction the provision sets out:</p> <ul style="list-style-type: none"> <li>The role of heritage as a cornerstone aspect of successful urban development is acknowledged, and provision is made for heritage and cultural values to be integrated into urban subdivision and development.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> <li>It is acknowledged that urban growth does have the potential to adversely affect important heritage values and settings where these are not identified and integrated into design.</li> <li>Integration of heritage values and settings into design is an important means of protecting heritage values consistent with RMA S6(f).</li> </ul>
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Support	Adopt.	<p>Supports the general direction the provision sets out:</p> <ul style="list-style-type: none"> <li>The role of heritage as a cornerstone aspect of successful urban development is acknowledged, and provision is made for heritage and cultural values to be integrated into urban subdivision and development.</li> <li>It is acknowledged that urban growth does have the potential to adversely affect important heritage values and settings where these are not identified and integrated into design.</li> <li>Integration of heritage values and settings into design is an important means of protecting heritage values consistent with RMA S6(f).</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Support	Adopt Policy 3.8.1(c)(iii) as notified.	<p>Supports the general direction the provision sets out:</p> <ul style="list-style-type: none"> <li>The role of heritage as a cornerstone aspect of successful urban development is acknowledged, and provision is made for heritage and cultural values to be integrated into urban subdivision and development.</li> <li>It is acknowledged that urban growth does have the potential to adversely affect important heritage values and settings where these are not identified and integrated into design.</li> <li>Integration of heritage values and settings into design is an important means of protecting heritage values consistent with RMA S6(f).</li> </ul>
144	Objectives on use and enjoyment of natural and built environment	Objective 4.1 - Public access to areas of value to the community is maintained or enhanced	Support	Adopt.	<ul style="list-style-type: none"> <li>Generally supports public access to heritage places and sites where appropriate.</li> <li>Recognises that it may not always be culturally appropriate to provide public access to certain places, and that in some cases, access can create risks to significant values.</li> <li>The ability to interact with and appreciate our significant heritage sites and places assists in ensuring the active management and protection of these cultural and heritage significance.</li> <li>Provides social and cultural benefits to the community.</li> </ul>
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Support	Adopt.	<ul style="list-style-type: none"> <li>Generally supports public access to heritage places and sites where appropriate.</li> <li>Recognises that it may not always be culturally appropriate to provide public access to certain places, and that in some cases, access can create risks to significant values.</li> <li>The ability to interact with and appreciate our significant heritage sites and places assists in ensuring the active management and protection of these cultural and heritage significance.</li> <li>Provides social and cultural benefits to the community.</li> </ul>
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: "Objective 4.2 Historic heritage resources are recognised and <u>protected in order to</u> contribute to the region's character and sense of identity".	<ul style="list-style-type: none"> <li>Provision must be made for Section 6(f), the "protection of historic heritage from inappropriate subdivision, use, and amendment development," as a matter of national importance.</li> <li>Supports Objective 4.2 which expresses an expectation that historic heritage will be recognised and will contribute to the region's character and sense of identity.</li> <li>"Recognition" is not sufficient to achieve the purpose of section 6(f): heritage resources cannot contribute to the region's character and sense of identity merely through being "recognised" they must also be protected.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
149	Historic heritage	Policy 4.2.1 - Recognising heritage themes	Support	Adopt.	<ul style="list-style-type: none"> <li>• Important to recognise the more specific context with regards to heritage resources in the Otago region.</li> <li>• The policy does a good job of summarising the range of heritage resources that exist in the region, providing scope for the identification, evaluation and recognition and protection of these various different types of heritage resources, which is consistent with section 6(f) of the RMA.</li> </ul>
150	Historic heritage	Policy 4.2.2 - Identifying historic heritage	Support	Adopt.	<ul style="list-style-type: none"> <li>• Heritage New Zealand (and other groups) have an important role in identifying and assessing heritage. Regional and territorial authorities should also take an active role in the identification of historic heritage.</li> <li>• The Policy will help achieve a consistent approach for heritage identification and evaluation within the region and may create cost savings and efficiencies for councils and groups undertaking this work.</li> </ul>
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: "Policy 4.2.3 <del>Protecting</del> Managing historic heritage values Protect and enhance the values of places and areas of historic heritage, by: ... f) Remediating <u>or repairing</u> , when adverse effects on other values cannot be avoided; and ..."	<ul style="list-style-type: none"> <li>• The terms "manage" and "protect" have quite different meanings. Given that the stated intention of the policy is to "protect" historic heritage, and that this accords with section 6(f) of the RMA, it would be more appropriate for the policy to be entitled "Protecting historic heritage values".</li> <li>• Clauses a) &amp; b) provide for appropriate management where heritage values are suspected or discovered.</li> <li>• Clauses c) &amp; d) recognise that it is appropriate to provide different levels of heritage protection depending on the significance of the resource.</li> <li>• The nature of heritage values is such that once damaged or destroyed, remediation is often not possible. It may however be possible to repair or replicate heritage features. The policy might be clarified by extending it to provide for repair as well as remediation.</li> <li>• The policy provides robust direction for the integration of heritage into new development and re-use of heritage buildings as a means of protecting heritage values.</li> </ul>
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Support	Adopt Polciy 4.3.4 b).	Supports adaptive re-use of buildings to enable the ongoing use of older buildings which brings with it benefits in terms of maintenance.
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Add clause to Policy 4.3.6(a) as follows: " <u>vi. Places or areas where there are significant historic heritage values</u> ".	<ul style="list-style-type: none"> <li>• Mineral and gas extraction has the potential to adversely affect heritage values.</li> <li>• Given that the protection of historic heritage from inappropriate subdivision, use and development is a matter of national importance pursuant to Section 6(f) of the RMA, it would be appropriate for the risk to these resources from mineral and gas extraction to be acknowledged in these policies.</li> </ul>
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Add clause to Policy 4.5.6(a) as follows: " <u>vi. Places or areas where there are significant historic heritage values</u> ".	<ul style="list-style-type: none"> <li>• Mineral and gas extraction has the potential to adversely affect heritage values.</li> <li>• Given that the protection of historic heritage from inappropriate subdivision, use and development is a matter of national importance pursuant to Section 6(f) of the RMA, it would be appropriate for the risk to these resources from mineral and gas extraction to be acknowledged in these policies.</li> </ul>
178	Methods	Methods - general	Amend	Add the following Method to Part C: " <u>Local authorities shall prepare and implement regulatory and non-regulatory incentives to facilitate the preservation of cultural and historic heritage places.</u> "	<ul style="list-style-type: none"> <li>• Seismic strengthening of older buildings is seen by Heritage New Zealand as an important means of building resilience.</li> <li>• Heritage building re-use has the potential to contribute to revitalisation, and to attract visitors. There is therefore a benefit to the community arising from the repair, maintenance and strengthening of older buildings.</li> <li>• Private owners of heritage buildings are generally ineligible for</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					financial assistance from organisations such as the Lottery Grants Board.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Support	Adopt.	It can be difficult for decision makers to take cultural values into consideration in decision making where these values are not properly understood and/or identified. The PRPS goes some way to identifying values of importance to Kai Tahu, however there is a need for the regional council and territorial authorities to go further in identifying and recognising important values so that these can be appropriately managed and provided for. This need is provided for in Methods 1.2.
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Support	Adopt Method 3.1.4 f).	<ul style="list-style-type: none"> <li>Provides for the enactment of Policy 4.2.3.</li> <li>Consistent with Section 6(f) of the RMA.</li> </ul>
192	Method 4 - City and District Plans	Method 4 - City and District Plans	Amend	Add the following to Method 4: " <u>City or District Plans may implement policy 4.2.3 by including heritage alert layers to inform the public about areas where there is a high probability of the presence of heritage values, particularly archaeological values.</u> "	<ul style="list-style-type: none"> <li>Risk to heritage values, particularly archaeological values, can arise where there is a lack of awareness about their presence and about the legal process under the HNZPTA amongst the general public and/or Council staff.</li> <li>Heritage alert layers (overlays showing areas where there is a high probability of archaeological material being present) provide a higher level of integration between local and regional authority planning documents and the HNZPTA.</li> <li>Awareness of heritage values can be incorporated into development proposals, providing the potential for site avoidance and other positive heritage outcomes.</li> <li>Heritage alert layers are a means of protecting archaeological values and avoiding accidental archaeological site damage.</li> <li>Method 3.1.1 discusses alert layers for culturally sensitive areas. There could be an opportunity to combine this method with the new method proposed.</li> </ul>
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Add the following wording to Method 4.1.9 a): " <u>Identifying and protecting significant historic heritage resources located within the authority's jurisdictional boundary.</u> "	<ul style="list-style-type: none"> <li>This method lacks clarity: It is presumed that this policy refers to Policy 4.2.3 (rather than 4.3.2), and that clause a) is intended to be divided into two separate ideas, those being: 1) the inclusion of accidental discovery protocols; and 2) providing for historic heritage retention. This is supported.</li> <li>The method needs to direct that city or district plans will identify and protect significant historic heritage values, to provide proper and thorough direction on how Policy 4.2.3 should be given effect to through city and district plans.</li> </ul>
244	Anticipated Environmental Results	AER 4.2 - Otago's significant historic heritage is identified, protected, and integrated into current and future uses	Amend	Amend to include additional indicators, as follows: <ul style="list-style-type: none"> <li><u>"• There is a comprehensive inventory of Otago's historic heritage resources.</u></li> <li><u>[measure] Regular reporting by regional, city and district councils on heritage inventory methodologies and progress.</u></li> <li><u>• There is no loss of significant historic heritage values associated with places, sites and areas identified in a district or regional plan.</u></li> <li><u>[measure] Number of resource consents issued where there would be partial or total loss of heritage values."</u></li> </ul>	<ul style="list-style-type: none"> <li>The indicators set out in AER 4.2 do not relate well to the objectives and policies concerning heritage: they are suitable for quantifying progress towards the integration of heritage into current and future uses but do not consider the "identification" and "protection" of heritage.</li> <li>AER 4.2 needs to be expanded in order to ensure that progress towards the objectives and policies can be accurately measured.</li> </ul>

### 121 Otago Water Resource Users Group

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
14	Principles of Te Tiriti o Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	<ul style="list-style-type: none"> <li>Amend e) as follows: "e) <u>Ensure Recognise Kai Tahu's are able to exercise of kaitiakitaka</u>".</li> <li>Delete "in a manner similar to that prescribed</li> </ul>	<ul style="list-style-type: none"> <li>There is no statutory authority for protecting Kai Tahu's exercise kaitiakitaka, and local authorities should not ensure this as consideration of competing interests is required by Part 2 of the RMA.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				for statutory acknowledgement areas" from Policy 1.1.2 f)iii).	<ul style="list-style-type: none"> <li>There is no legal authority to provide for other areas that are significant to Kai Tahu in a similar manner to statutory acknowledgement areas.</li> </ul>
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) <del>Ensuring</del> <u>Recognising</u> the resources that support their customary uses and cultural values (as detailed in Schedules 1A and B); and".	<ul style="list-style-type: none"> <li>There is no statutory authority for ensuring protection of Kai Tahu customary uses and cultural values.</li> <li>Local authorities should not ensure this as consideration of competing interests is required by Part 2 of the RMA.</li> </ul>
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	<ul style="list-style-type: none"> <li>Delete a).</li> <li>Amend b) as follows: "b) Avoiding remedying or mitigating other adverse effects on those values and sites; and".</li> </ul>	<ul style="list-style-type: none"> <li>a) is too absolute. There is no statutory authority for this.</li> <li>Policies b) and c) when read together are sufficient.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	<ul style="list-style-type: none"> <li>Amend a) as follows: "a) Support healthy ecosystems in all Otago aquifers, and rivers, lakes, wetlands, and their margins; and"</li> <li>Delete b) and h).</li> <li>Amend j) as follows: "<del>Protect</del> <u>Provide for</u> Kai Tahu values; and".</li> <li>Amend m) as follows: "<del>Maintain</del> <u>Provide for</u> the aesthetic and landscape values of rivers, lakes, and wetlands; and".</li> </ul>	<ul style="list-style-type: none"> <li>There may be some rivers in dry areas where it is appropriate to compromise ecosystem values in exchange for the benefits achieved by abstracting water. Section 5 of the RMA is not worded in a way that requires healthy ecosystems in all water bodies.</li> <li>Clauses b), h) and m) as currently written prevent any further allocation of water for abstraction or damming and storage.</li> <li>Clauses b) and h) can be deleted as these matters are adequately covered by clause a).</li> <li>Clause j) as currently written elevates Kai Tahu values above the economic interests of using water.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	<ul style="list-style-type: none"> <li>Delete Policy 2.1.2a) and e).</li> <li>Amend Policy 2.1.2 g) as follows: "<del>Protect</del> <u>Provide for</u> Kai Tahu values; and".</li> </ul>	<ul style="list-style-type: none"> <li>Water abstraction and storage and associated structures can interfere with the natural functioning of the beds of rivers.</li> <li>Clause a) as currently written is too absolute and would be a significant barrier to obtaining consent for abstraction and storage, including when a consent needs to be renewed.</li> <li>Clause e) as currently written prevents any modification that would reduce the range and extent of habitats supported.</li> <li>Clause g) as currently written elevates Kai Tahu values above activities that impact on the value to be protected.</li> <li>Clauses a) and e) can be deleted as these matters are adequately covered by clause d).</li> </ul>
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Support	Support Policy 3.1.1a).	No reason given.
96	Objectives on resilience, health and safety	Objective 3.4 - Good quality infrastructure and services meet community needs	Support	Support.	No reason given
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Support	<ul style="list-style-type: none"> <li>Support c) and d).</li> <li>Address cross-reference to Method 3.</li> </ul>	Policy 3.4.2 is cross referenced to Method 3 (Regional Plans), but there is no reference in Method 3 to policy 3.4.2.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	<ul style="list-style-type: none"> <li>Amend as follows: "Recognise the national <del>and/or</del> regional significance of the following infrastructure:..."</li> <li>Include "Central Otago irrigation schemes" in the list of infrastructure having national or regional significance.</li> </ul>	<ul style="list-style-type: none"> <li>Under section 30 of the RMA the Regional Council has the function, when giving effect to Part 2 of the Act, of the strategic integration of infrastructure with land use. "Infrastructure" includes systems for irrigation.</li> <li>Central Otago irrigation schemes own infrastructure which have regional significance. It is therefore appropriate that policies 3.5.2 and 3.5.3 should apply to Central Otago irrigation scheme infrastructure.</li> <li>Proposed amendment to the opening paragraph ensures consistency with policies 3.5.2 and 3.5.3.</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Support	Support subject to submission on Policy 3.5.1 being adopted.	No reason given.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	Delete Policy 3.6.3 c).	<ul style="list-style-type: none"> <li>Clause c) elevates water use by a nationally or regionally significant renewable electricity generation activity (existing or prospective) above other water users.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> <li>The matter is adequately addressed by policy 3.6.3 a).</li> </ul>
143	Objectives on use and enjoyment of natural and built environment	PRAs and explanations - Use and enjoyment of natural and built environment	Support	Support narrative to Chapter 4 (p75).	No reason given.
161	Objectives on use and enjoyment of natural and built environment	Objective 4.4 - Otago's communities can make the most of the natural and built resources available for use	Support	Support.	No reason given.
162	Making the most of available resources	Policy suite 4.4 - Otago's communities can make the most of the natural and built resources available for use	Amend	Include the following new policy ahead of the existing policy 4.4.1: <u>"4.4.1A Managing water for consumptive use</u> <u>When managing water:</u> a) <u>Recognise that the consumptive uses of Otago's water require sufficient quantities of quality water; and</u> b) <u>Recognise that significant historic investment reliant on water availability require sufficient quantities of quality water."</u>	<ul style="list-style-type: none"> <li>The RPS needs to contain an actual policy recognising the importance of water for agriculture.</li> <li>Water availability for agriculture is one of the major resource management issues of the region and water allocation for irrigation is a major issue of integrated management of the water resource. Therefore, Section 59 of the RMA requires the RPS to recognise the value of water for the agricultural industry.</li> <li>There is no direct policy recognising the value of water for the agricultural industry. This results in an imbalance in the policies dealing with potentially competing interests, favouring those matters identified by the policies compared to the use of water for agriculture.</li> </ul>
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	<ul style="list-style-type: none"> <li>Amend b) as follows: "b) <del>Requiring</del><u>Encouraging</u> the development or upgrade of infrastructure that increases use efficiency; and".</li> <li>Support clause d).</li> </ul>	<ul style="list-style-type: none"> <li>Clause b) as currently written is too prescriptive and too absolute for a regional policy statement.</li> <li>Infrastructure efficiency was dealt with by the Regional Plan: Water, Plan Change 1C. It is not appropriate to re-litigate this matter again under a regional policy statement.</li> </ul>
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Amend	Amend as follows: <del>"Avoid discharges that are objectionable or offensive to takata whenua and the wider community, including:</del> ... e) <del>Odorous or conspicuous discharges."</del>	<ul style="list-style-type: none"> <li>The issue of objectionable discharges was recently addressed by the Regional Plan: Water, Plan Change 6A. It is not appropriate to now rewrite this policy through the Proposed RPS.</li> <li>It is not appropriate that takata whenua or the wider community can determine that a discharge is objectionable or offensive and thus require it to be avoided.</li> <li>Certain discharges to land are contemplated by the Regional Plan: Water but would need to be avoided under the Proposed RPS Policy 4.5.1.</li> </ul>
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Amend	Amend Method 1.4.1 as follows: "1.4.1 Delegate and transfer RMA plan administration functions to an iwi authority, where <u>this is appropriate and</u> provides an efficient and effective service."	The delegation of plan administration functions should not just be when "efficient and effective", but also needs to be when "appropriate".
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Amend	Amend Method 2.2.3 as follows: "2.2.3 Delegate or transfer RMA functions, where <u>this is appropriate and</u> provides an efficient and effective service, from...".	The delegation of plan administration functions should not just be when "efficient and effective", but also needs to be when "appropriate".
188	Method 3 - Regional Plans	Method 3 - Regional Plans	Amend	Include a new method under Method 3 corresponding with the requested new policy 4.4.1A.	<ul style="list-style-type: none"> <li>The RPS needs to contain a method recognising the importance of water for agriculture.</li> <li>Water availability for agriculture is one of the major resource management issues of the region and water allocation for irrigation is a major issue of integrated management of the water resource. Therefore, Section 59 of the RMA requires the RPS to recognise the value of water for the agricultural industry.</li> </ul>
226	Anticipated Environmental Results	Anticipated Environmental Results - General	Amend	Include a new Anticipated Environmental Result corresponding with the requested new policy 4.4.1A.	<ul style="list-style-type: none"> <li>The RPS needs to contain an anticipated environmental result recognising the importance of water for agriculture.</li> <li>Water availability for agriculture is one of the major resource management issues of the region and water allocation for irrigation is a major issue of integrated management of the water resource. Therefore, Section 59 of the RMA requires the RPS to recognise the</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					value of water for the agricultural industry.
249	Glossaries	Glossary	Amend	Include into the Glossary the following statement: "Wetland excludes any wetland constructed for the purpose of water quality management".	The suggested amendment is consistent with the outcome of the Regional Plan: Water, Plan Change 6A.
262	Objectives on Kai Tahu values	Need 1.2	Amend	Amend the "Need" statement associated to Objective 1.2 (p. 16) as follows: "In managing our natural resources, local authorities need to recognise Kai Tahu values and <u>have regard to Kai Tahu plans more effectively, and enable the exercise of customary rights.</u> "	<ul style="list-style-type: none"> <li>• Provision currently implies that local authorities have not been sufficiently effective in recognising Kai Tahu values and plans. However, the Regional Plan: Water appropriately recognises Kai Tahu values.</li> <li>• "To recognise Kai Tahu plans" is too absolute and suggests the Kai Tahu plans are binding on local authority plans. Method 1.1.2 of the Proposed RPS uses the more appropriate phrase "Have regard to Iwi Management Plans".</li> <li>• "To enable the exercise of customary rights" is too absolute. Section 6 of the RMA refers to recognising and providing for the protection of "protected customary rights" not "customary rights".</li> </ul>
263	Objectives on Kai Tahu values	Introduction to Objective 1.1	Amend	Delete the following paragraph from the introduction to Objective 1.1: "A partnership approach, which involves Kai Tahu and elevates their values, rights and interests in decision making processes, enables the principles, including kaitiakitaka, to be given effect in an appropriately flexible way, and recognises the special relationship between Kai Tahu and the Crown."	<ul style="list-style-type: none"> <li>• There is no statutory authority for Kai Tahu's values, rights and interests to be elevated above other users' rights and interests.</li> <li>• The treaty partnership between the Crown and Maori does not extend to a partnership between local authority and Maori in decision-making processes.</li> <li>• The decision for a local authority to transfer its functions, powers or duties to an iwi authority needs to be made by a local authority in regard to the particular circumstances and should not be a Regional Policy Statement direction.</li> </ul>
264	Objectives on Kai Tahu values	Introduction to Objective 1.2	Amend	Delete the following paragraph from the introduction to Objective 1.2: "In addition to the ability to participate in decision-making and implementation."	<ul style="list-style-type: none"> <li>• The treaty partnership between the Crown and Maori does not extend to a partnership between local authority and Maori in decision-making processes.</li> <li>• The decision for a local authority to transfer its functions, powers or duties to an iwi authority needs to be made by a local authority in regard to the particular circumstances and should not be a Regional Policy Statement direction.</li> </ul>
265	Chapter B2 - High quality natural resources	Outcome 2 and introduction	Support	Support Narrative to Chapter 2 (p23).	No reason given.
285	Objectives on resilience, health and safety	Introduction to Objective 3.4	Support	Support narrative associated to Objective 3.4 (p. 56).	No reason given.
300	Objectives on use and enjoyment of natural and built environment	Introduction to Objective 4.4	Support	Support narrative to Objective 4.4 (p. 85).	No reason given.

## 122 Queenstown Airport Corporation

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Withdraw the proposed RPS in the event that the amendments sought in the submission are not implemented.	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	Amend as follows: "Ensure that local authorities exercise their functions and powers, to: a) <del>Accord Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,</del> ... d) <del>Ensure Kai Tahu have the prerogative to:</del> <u>Recognise and provide for Kai Tahu to identify their relationship with their ancestral lands, water, sites, wahi tapu and other taoka by;</u>	<ul style="list-style-type: none"> <li>• Maintaining good working relationship with Kai Tahu when dealing with resource management issues is already a requirement inherent within the RMAS6(e), 7(a) and 9.</li> <li>• Clause (a) does not appear to have an identified resource management purpose and should be deleted. It is inconsistent with the notification determination which focuses on the extent of effects, not the status of a party.</li> <li>• Clauses (d) and (e) require further amendment to better align with sections 6 and 7 of the RMA.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				i. Identify their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and ii. Determine how best to express that relationship; and e) <del>Ensure Kai Tahu are able to</del> Have regard to the exercise of kaitiakitaka; and ..."	
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Kai Tahu values, <del>rights and interests and customary resources are sustained-</del> recognised and provided for."	<ul style="list-style-type: none"> <li>A requirement to "recognise and provide for" Kai Tahu values will provide a broader framework for the management of these values.</li> <li>Reference to "rights" should be deleted as the subsequent policies do not provide any further context around what specific "rights" are being referred to.</li> </ul>
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Support	Maintain objective as notified.	Concerned about how this objective will be applied in practice. For this objective to be useful it needs to be supported by additional policies that recognise, maintain and enhance physical resources.
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Include additional policies that recognise, maintain and enhance physical resources	Current policies are insufficient to achieve Objective 2.1 as they only address natural values and not physical values.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	<ul style="list-style-type: none"> <li>The policy should seek to "provide for" Kai Tahu values (clause j) and remove reference to "other cultural value".</li> <li>Amend as follows: "Recognise freshwater values, and manage freshwater, to: ...</li> <li>c) Protect <u>the values of</u> outstanding water bodies and wetlands; and ...</li> <li>j) <del>Protect</del> <u>provide for</u> Kai Tahu values; and ...</li> <li>p) Maintain the ability of existing infrastructure to operate within their design parameters <u>and provide for appropriate upgrade and expansion of infrastructure.</u></li> <li>q) <u>Maintain the ability of water users to provide for the economic, health and safety and social wellbeing of the community.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>Amend so that it suitably recognises and provides for the development and growth of infrastructure that relies on fresh water resources.</li> <li>The policy also needs to recognise the use of freshwater in providing for the social and economic wellbeing of the community.</li> <li>Enabling industry that relies on freshwater resources to only operate within the bounds of existing parameters discourages growth.</li> <li>Better guidance is required as to how policies will be implemented and what outcome is intended.</li> <li>Unclear what is intended by protecting Kai Tahu values and providing for other cultural values.</li> </ul>
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend the policy as follows: "Recognise air quality values, and manage air quality, to: ... b) <del>Protect</del> <u>Provide for</u> Kai Tahu values; and c) Maintain <del>other cultural</del> aesthetic and amenity values d) <u>Protect visibility in and around the region's airports and flight paths.</u> "	<ul style="list-style-type: none"> <li>It is not clear why Kai Tahu values are to be elevated above all other resource management issues relating to the management of air quality, in that they are required to be protected.</li> <li>QAC is concerned the policy does not recognise that visibility is an issue with respect to operations in and around an airport and that air discharges should be considered/ restricted in light of this.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Oppose	Delete this policy.	<ul style="list-style-type: none"> <li>This policy applies to all ecosystems, indigenous and otherwise, and has no regard to the significance of these ecosystems.</li> <li>As other policies provide for areas of significance this policy is not needed.</li> </ul>
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Amend	Amend as follows: "Otago's significant and highly-valued natural resources are identified, and protected <del>or enhanced-</del> from inappropriate use or development."	This objective is too restrictive and generic in that it seeks to "protect" all of Otago's significant and highly valued natural resources.
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend the policy as follows: "Protect and <u>where appropriate</u> enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) <u>Avoiding where practicable</u> adverse effects	<ul style="list-style-type: none"> <li>It is appropriate that this policy acknowledges that the "protection" of significant indigenous vegetation and habitats of significant fauna can also be achieved via appropriate mitigation and/or offset strategies.</li> <li>It is necessary to recognise and provide for circumstances where enhancing significant habitats of indigenous fauna (especially birdlife)</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				on those values which contribute to the area or habitat being significant; and b) Avoiding <u>where practicable</u> significant adverse effects on other values of the area or habitat; and ... d) <u>Remedying or</u> mitigating where adverse effects cannot be avoided <del>or remediated</del> ; ...	may adversely impact on the safety of aircraft and passengers. • Proposed amendments would provide better certainty as to how the policy is to be applied.
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Oppose	Delete this policy or amend clause a) as follows: "a) Avoiding <u>significant</u> adverse effects on those values which contribute to the significance of the natural feature, landscape or seascape; and"	<ul style="list-style-type: none"> <li>• This policy seeks to combine a number of different resource management issues (section 6(a), 6(b) RMA, and policies 13 and 15 of the NZCPS) and directives, and the result is somewhat confused.</li> <li>• Clause a) goes further than part 2 of the Act. It leaves no room to provide for important physical resources such as infrastructure or other activities common in areas of outstanding value.</li> <li>• The installation of obstacle lighting may be required in areas of outstanding natural landscape in response to changes in Civil Aviation requirements. Caselaw on meaning of "avoid" would potentially prohibit such activities.</li> </ul>
64	Natural systems and interdependencies	Policy 2.3.5 - Applying an integrated management approach for airsheds	Amend	Amend to recognise that poor air quality can result in adverse safety effects for aircraft and passengers.	When providing for the integrated management of natural and physical resource,s consideration needs to be given to the potential for poor visual quality which can adversely impact on the safety of aircraft and passengers.
65	Chapter B3 - Resilience, health and safety	Chapter B3 - general requests	Amend	Insert new objectives and / or policies that recognise specifically the benefits associated with the development and on going use of airports within the region.	This is required to recognise the significant benefits and functions airports provide to the economic, social and cultural wellbeing of the region.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Revise to make this objective clearer or delete it.	<ul style="list-style-type: none"> <li>• This objective is too vague to be effective and meaningful in its implementation.</li> <li>• It is not clear what is meant by "environmental constraint".</li> </ul>
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Oppose	Delete Policy 3.1.1.	<ul style="list-style-type: none"> <li>• Reference to "environmental constraint" is ambiguous and should be removed.</li> <li>• It is not at all clear how this policy will be implemented in practice and what this would mean for developments and activities throughout the region.</li> <li>• The weighing of individual policies that provide for development and those that seek protection will ensure that environmental constraints are considered.</li> </ul>
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate to seek to minimise the risk from natural hazards to communities.
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate to identify natural hazards present within the Otago region.
82	Natural hazard risk	Policy 3.2.2 - Assessing natural hazard likelihood	Support	Retain the objective as notified (or similar wording to achieve relief).	<ul style="list-style-type: none"> <li>• It is appropriate to assess the likelihood of natural hazard events occurring.</li> <li>• The method places the onus on the ORC and territorial authorities to undertake this work: it would be inappropriate for every resource user to have to complete an individual natural hazard assessment.</li> </ul>
83	Natural hazard risk	Policy 3.2.3 - Assessing natural hazard consequence	Support	Amend policy to make it clear that the natural hazard assessment will be undertaken at a strategic level.	This assessment should be part of a higher level strategic assessment by the regional council.
96	Objectives on resilience, health and safety	Objective 3.4 - Good quality infrastructure and services meet community needs	Amend	Amend the objective as follows: "Good quality infrastructure and services meets community needs <u>on a local, regional and national scale.</u> "	It is necessary to recognise specifically that certain infrastructure might be required in order to support the wider needs of New Zealand, rather than the needs of Otago as a region or local area only.
98	Infrastructure - general	Policy 3.4.1 - Integrating	Amend	Insert new clause e) as follows: " e) Ensuring	• For certain infrastructure (i.e. local roads) integration with land use

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		infrastructure with land use		<del>that land use and development does not result in adverse effects on the operation, use and development of infrastructure.</del>	patterns and development is essential. <ul style="list-style-type: none"> <li>• Certain infrastructure, such as regionally or nationally significant infrastructure, does not require to be so closely integrated with urban areas and development</li> <li>• In some cases the nature of the infrastructure influences the quality and use of the environment surrounding it.</li> <li>• This policy should also seek to ensure that land use development does not result in adverse effects (i.e. reverse sensitivity effects) on certain infrastructure assets.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	<ul style="list-style-type: none"> <li>• Provide for the development of infrastructure where it appropriately manages adverse effects on the environment, and where the development will give rise to benefits on a local, regional or national basis.</li> <li>• Amend policy to refer to the "management of effects arising from the development and use of infrastructure activities".</li> </ul>	<ul style="list-style-type: none"> <li>• Seeking to manage infrastructure activities is not appropriate as this is ultimately driven by commercial, economic, and other imperatives that are not relevant in the context of the RMA.</li> <li>• As drafted this policy provides little guidance in terms of how projects relating to infrastructure will be assessed and considered under the RPS.</li> </ul>
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend this policy to provide for the development and ongoing use and maintenance of lifeline utilities within the region.	<ul style="list-style-type: none"> <li>• Given the status of such facilities as lifeline utilities and the standards required under other legislation (i.e. the Building Act), this policy does not need to ensure they will be developed to withstand natural hazard events.</li> <li>• This policy should seek to recognise the essential nature and benefits that are to be derived from the development and ongoing protection of such "lifeline utilities" within the region.</li> </ul>
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Support	Retain policy as notified (or similar wording to achieve desired relief).	<ul style="list-style-type: none"> <li>• This policy is considered appropriate, subject to the amendments to the definition of lifeline utility.</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend the objective as follows: " <del>Infrastructure of national and regional significance is managed in a sustainable way. The development, use, operation and maintenance of infrastructure of national and regional significance is recognised and provided for.</del> "	<ul style="list-style-type: none"> <li>• This objective is generally supported.</li> <li>• It is not appropriate for the RPS to determine how infrastructure is to be managed as there are commercial, economic and other imperatives that drive the management of such facilities.</li> <li>• It is appropriate for the RPS to enable the development, use, operation and maintenance of infrastructure of national or regional significance.</li> </ul>
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Support	Retain policy as notified (or similar wording to achieve desired relief).	It is appropriate that regionally significant infrastructure is identified as being of national and regional importance.
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend the policy as follows: " <del>Minimise Manage</del> adverse effects from infrastructure that has national or regional significance <del>that is located in</del> <del>by:</del> a) <del>Giving preference to avoiding their location in:</del> i. Areas of significant indigenous vegetation and significant habitats of indigenous fauna; and ii. Outstanding natural features, landscapes and seascapes; and iii. Areas of outstanding natural character; and iv. Outstanding water bodies or wetlands; and <del>By</del> b) <del>Where it is not possible to avoid locating in the areas listed in a) above, avoiding significant adverse effects on those values that contribute to the significant or outstanding nature of those</del>	<ul style="list-style-type: none"> <li>• The proposed management regime is not necessary or appropriate given the strategic importance of national and regional infrastructure assets.</li> <li>• It does not recognise that there are often locational, technical and/or functional constraints to infrastructure location and operation, e.g. obstacle lighting and/ or vehicle access routes for aircraft safety.</li> <li>• Where infrastructure development is proposed within any of the identified areas, this policy should require an assessment of the significance of adverse effects on those values as set out in d) taking into account the measures to avoid, remedy or mitigate those effects, and the overall benefits arising from the development.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>areas; and</p> <p>c) <del>Avoiding, remedying or mitigating other adverse effects on values; and</del></p> <p><del>d) b) Assessing the significance of adverse effects on those values, as detailed in Schedule 3 taking into account the measures to avoid, remedy or mitigate adverse effects</del></p> <p>; and</p> <p><del>e) c) Considering where appropriate the use of offsetting, or other compensatory measures, for residual adverse effects on indigenous biodiversity that are significant and cannot be otherwise avoided, remedied or mitigated.</del></p>	
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Support	Retain policy as notified ( or similar wording to achieve relief).	This policy is supported as it seeks to protect infrastructure.
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Support	Retain the objective as notified (or similar wording to achieve relief).	It is appropriate that urban development takes place in a manner which takes into account the existing environment and minimises potential conflicts between incompatible activities.
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	<ul style="list-style-type: none"> <li>• Insert the following clause between b) and c): "<u>Avoiding urban development which constrains the ability of regionally significant infrastructure or industry to be developed and used without undue constraint that may arise from adverse effects relating to reverse sensitivity or safety; and</u>"</li> <li>• Renumbering clauses c) to h) accordingly.</li> </ul>	To effectively manage urban growth conflicts and reverse sensitivity effects should be considered, particularly with respect to the encroachment of incompatible activities around key infrastructure assets.
130	Hazardous substances and waste	Policy 3.9.1 - Integrating management of hazardous substances and waste	Support	Retain the objective as notified (or similar wording to achieve relief).	Because hazardous substances are managed by a number of different agencies an integrated approach will need to be adopted, taking into consideration the various roles and responsibilities at a national, regional and local level.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Oppose	Delete Policy 3.9.5.	<ul style="list-style-type: none"> <li>• It is not clear what implications this policy might have on development throughout the region.</li> <li>• Airports, ports, and other infrastructure and industrial activities are listed on the Ministry for the Environment's HAIL list.</li> <li>• This policy could be interpreted that facilities that use hazardous substances will become sites of contaminated land and therefore should be avoided.</li> </ul>
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	<p>Amend the policy as follows: "<u>To recognise and provide for the protection of historic heritage resource of the region from inappropriate subdivision, use and development by:</u></p> <p><u>a) Identifying and assessing the significance of the historic heritage resources within the region;</u></p> <p><u>b) Having regard to any relevant entry in the Historic Places register in the process of identifying and assessing the historic heritage resource;</u></p> <p><u>c) Considering historic heritage items, places, or areas of significance or importance to communities in the process of identifying and assessing the historic heritage resource;</u></p> <p><u>d) Recognising that knowledge about some</u></p>	<ul style="list-style-type: none"> <li>• While it is appropriate to protect historic heritage from inappropriate subdivision, use and development, this policy goes further than RMA S6(f).</li> <li>• Iwi values, including the protection of wahi tapu and wahi taoka, are provided for in Chapter 1 and do not need to be repeated in this policy</li> <li>• The policy adopts a strong position on avoiding adverse effects on areas which might only have "suspected" heritage or cultural values. This is not considered an appropriate response.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><u>historic heritage may be culturally sensitive and support protection of those areas through the maintenance of silent files held by local authorities;</u></p> <p>e) <u>Recognise that there may be sites of historic heritage which are unknown and having appropriate accidental discovery protocols in place to manage the discovery of such features</u>.</p>	
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Amend	<p>Amend the policy as follows:  "Recognising the values of Otago's central business districts <u>and other economic centres</u>  Recognise the values of Otago's central business districts <u>and other economic centres</u>, including as the primary focal point for <u>as providing for the</u> social, cultural and economic activities within community."</p>	<ul style="list-style-type: none"> <li>Central business districts are not the only centres and activity which provide for the economic wellbeing of the community.</li> <li>Queenstown Airport in particular contributes to the national and regional economy through its role in the tourism industry, the employment opportunities it provides, and the retail and other commerce related activities undertaken at the Airport.</li> </ul>
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	<p>Amend the policy as follows: "Manage the distribution of commercial activities in larger urban areas, <del>to maintain the vibrancy of the central business district and support local commercial needs,</del> by:</p> <p>a) Enabling a wide variety of commercial, social and cultural activities in <u>appropriate locations the central business district</u>; and</p> <p>...</p> <p><del>c) Avoiding unplanned extension of commercial activities that has significant adverse effects on the central business district, including on the efficient use of infrastructure, employment and services; and</del></p> <p>..."</p>	<ul style="list-style-type: none"> <li>It is not appropriate to only encourage growth and development of commercial activities within the central business district.</li> <li>Commercial and retail activities undertaken at the Airport are essential to ensuring that the Airport is efficient and effective in its operation and provides for the needs of travellers, visitors and staff.</li> <li>It is essential to recognise that Airports in themselves are and can become key economic centres for a district.</li> </ul>
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Support	Retain policy as notified (or similar wording to achieve relief).	It is appropriate to recognise and provide for the development and ongoing use of industrial activities that are essential to the economic and social wellbeing of the region, particularly where those supporting the safe and efficient functioning of Queenstown and Wanaka Airports.
166	Objectives on use and enjoyment of natural and built environment	Objective 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Oppose	Amend Objective 4.5 as follows: "Adverse effects <u>arising from the development use of Otago's natural and physical resources are avoided, remedied or mitigated</u> <del>of using and enjoying Otago's natural and built environment are minimised.</del> "	<ul style="list-style-type: none"> <li>Reference to enjoyment is vague and subjective.</li> <li>The objective should relate to the development and use of Otago's natural and physical resources.</li> <li>It should also seek to avoid, remedy or mitigate adverse effects on such resources.</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend policy as follows: "Enable offsetting of adverse effects on indigenous biodiversity values, <del>only</del> <u>including</u> when: ...."	<ul style="list-style-type: none"> <li>It is useful to enable offsetting in certain situations.</li> <li>It is unclear why the ability to offset adverse effects on indigenous biodiversity has been limited to activities with a functional necessity to locate in areas of significant biodiversity.</li> <li>QAC seeks to broaden the opportunities to consider offsetting.</li> </ul>
249	Glossaries	Glossary	Amend	Lifeline utilities - amend the definition of "lifeline utilities" to specifically refer to the infrastructure, buildings, ancillary equipment and activities that are undertaken by the entities referred to in the Civil Defence Emergency Act.	<ul style="list-style-type: none"> <li>Support the inclusion of "lifeline utilities" as part of the RPS.</li> <li>The definition contained within the Civil Defence Emergency Management Act refers to entities rather than facilities.</li> </ul>

## 123 Landscape Connections Trust

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Enhancing protection of indigenous biodiversity, the health and ecosystems and habitats, and the life-supporting capacity of air, water, soil and land should be the primary focus of the RPS.	To ensure Otago's environment is managed sustainably.
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	Clearly identify regionally significant resource management issues, including but not limited to: <ul style="list-style-type: none"> <li>• water overallocation and degradation</li> <li>• indigenous biodiversity loss and habitat degradation</li> <li>• coastal ecosystem health</li> <li>• health of estuaries and wetlands.</li> </ul>	<ul style="list-style-type: none"> <li>• Section 62 (1) (a) of the Resource Management Act requires the identification of significant resource management issues for the region.</li> <li>• These are not clearly identified and there is lack of clarity about how they are being addressed by the objectives and policies in the proposed RPS.</li> <li>• There are a number of regionally significant resource management issues that need to be explicitly identified and addressed through the objectives and policies, linked with anticipated environmental results and indicating an expected reversal in the current trends of degradation we are seeing in our region, particularly trends in water quality and allocation issues, loss of indigenous biodiversity and degradation of indigenous habitats, and health of our coastal ecosystems, particularly estuaries and wetlands</li> </ul>
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	<ul style="list-style-type: none"> <li>• Review Objectives 2.1, 2.2 and 2.3 to ensure wording adequately addresses the maintenance and enhancement of landscape values, healthy ecosystems, habitats, and of the life-supporting capacity of air, water, soil and land.</li> <li>• Review related policies to ensure this is consistent throughout the Chapter. This may involve adding new policies.</li> </ul>	<ul style="list-style-type: none"> <li>• Ecosystems are greater than the sum of the "natural and physical resources" and "natural systems" that make them up.</li> <li>• The health of these ecosystems needs to be recognised, maintained and protected as a whole. So too does the life-supporting capacity of habitats – air, land, water and soil.</li> <li>• "Natural and physical resources" also struggles to encompass all important landscape values, which also need to be considered.</li> <li>• Consequential amendments may also need to be made to related policies, or there may need to be addition of new policies, to reflect this.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Review policies related to Objective 2.2 to ensure this message [that sustainable management of natural and physical resources is essential across Otago] is consistent throughout the related policies. This may involve adding new policies.	<ul style="list-style-type: none"> <li>• Whilst a higher level of protection is supported for areas of significant and highly valued landscapes, ecosystems, habitats and natural and physical resources, it is essential that sustainable management of the environment is practised across Otago.</li> <li>• The current wording of this section, with its focus on consumptive use of resources, gives cause for concern, and an amendment is sought to address this.</li> <li>• Consequential amendments may also need to be made to related policies, or there may need to be addition of new policies, to reflect this.</li> </ul>
253	Other comments	Structure of the document & useability - general	Amend	Amendment of the four pillar structure of the proposed RPS, to reflect traditional theme areas (e.g. water, land, coast).	<ul style="list-style-type: none"> <li>• The current four pillar structure makes it difficult to identify all policies relevant to any given issue, and to address any duplication or conflict.</li> <li>• A re-write of the document, with relevant objectives and policies grouped under traditional theme areas, would provide significantly improved clarity for users.</li> </ul>
265	Chapter B2 - High quality natural resources	Outcome 2 and introduction	Amend	<ul style="list-style-type: none"> <li>• If the current structure is to be retained, amend Part B - Chapter 2 (outcome explanation) (p. 23), and Objective 2.1 (explanatory text)(p.26), to focus on the intrinsic and natural values of the environment, and their protection, not on the use of the environment.</li> <li>• Review related policies to ensure this is consistent throughout the Chapter.</li> </ul>	<ul style="list-style-type: none"> <li>• It is essential that this pillar is focused on the intrinsic values of the environment, and their protection, as the use of the environment is considered under Part B – Chapter 4.</li> <li>• These two blocks of explanatory text in particular currently conflate use of the natural environment into sections that should be focused on explaining intrinsic value and protection of the environment (ecosystems, habitats, species and natural and physical resources).</li> <li>• Consequential amendments may also need to be made to related policies to reflect this.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
269	Objectives on high quality natural resources	Introduction to Objective 2.1	Amend	<ul style="list-style-type: none"> <li>If the current structure is to be retained, amend Part B - Chapter 2 (outcome explanation) (p. 23), and Objective 2.1 (explanatory text)(p.26), to focus on the intrinsic and natural values of the environment, and their protection, not on the use of the environment.</li> <li>Review related policies to ensure this is consistent throughout the Chapter.</li> </ul>	<ul style="list-style-type: none"> <li>It is essential that this pillar is focused on the intrinsic values of the environment, and their protection, as the use of the environment is considered under Part B – Chapter 4.</li> <li>These two blocks of explanatory text in particular currently conflate use of the natural environment into sections that should be focused on explaining intrinsic value and protection of the environment (ecosystems, habitats, species and natural and physical resources).</li> <li>Consequential amendments may also need to be made to related policies to reflect this.</li> </ul>
270	Objectives on high quality natural resources	Introduction to Objective 2.2	Amend	Amend introduction to Objective 2.2 (p.32) to acknowledge that sustainable management of natural and physical resources is essential across Otago.	<ul style="list-style-type: none"> <li>Whilst a higher level of protection is supported for areas of significant and highly valued landscapes, ecosystems, habitats and natural and physical resources, it is essential that sustainable management of the environment is practised across Otago.</li> <li>The current wording of this section, with its focus on consumptive use of resources, gives cause for concern, and an amendment is sought to address this.</li> <li>Consequential amendments may also need to be made to related policies, or there may need to be addition of new policies, to reflect this.</li> </ul>

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Support	<ul style="list-style-type: none"> <li>Support the fact the RPS is a high level strategy.</li> <li>Particularly supportive of the recognition of controlling the adverse effects of pest species.</li> <li>Make amendments to better recognise the importance of food production in the Otago region.</li> </ul>	<ul style="list-style-type: none"> <li>Biosecurity and prevention of introduction of unwanted organisms that are a threat to horticultural crops is a key issue for growers.</li> </ul>
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	<ul style="list-style-type: none"> <li>Amend Objective 2.1 as follows: "The values of Otago's natural and physical resources are <u>identified</u>, recognised, maintained and enhanced. "</li> <li>Include methods for identification of values.</li> </ul>	<ul style="list-style-type: none"> <li>The objective seeks to recognise, maintain and enhance values of natural and physical resources but does not provide for the identification of such values.</li> <li>It is not clear what the Council intends are the "values" or how they will be identified.</li> <li>While Objective 2.2 and related policies include identification of significant and highly values natural resources, it does not include all natural resources included under Objective 2.1.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	<ul style="list-style-type: none"> <li>Amend Policy 2.1.1 as follows: "<u>Identify and</u> recognise freshwater values and manage to: ..." <ul style="list-style-type: none"> <li>g) Provide for food production values."</li> <li>Include methods for identification of values.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>It is not clear where or how freshwater values will be identified. For values to be recognised and managed, they need to first be identified.</li> <li>Food production should be recognised as part of managing freshwater.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	<ul style="list-style-type: none"> <li>Amend Policy 2.1.2 as follows: "<u>Identify and</u> recognise the values of beds or rivers and lakes, wetlands and their margins and manage them to: ..." <ul style="list-style-type: none"> <li>Include methods for identification of values.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>It is not clear where or how values will be identified.</li> <li>For values to be recognised and managed, they need to first be identified.</li> </ul>
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	<ul style="list-style-type: none"> <li>Amend Policy 2.1.3 as follows: "<u>Identify and</u> recognise the values of coastal water and manage coastal water to: ..." <ul style="list-style-type: none"> <li>Include methods for identification of values.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>It is not clear where or how values will be identified.</li> <li>For values to be recognised and managed, they need to first be identified.</li> </ul>
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	<ul style="list-style-type: none"> <li>Amend Policy 2.1.4 as follows: "<u>Identify and</u> recognise air quality values and manage air quality to: ..." </li> </ul>	<ul style="list-style-type: none"> <li>It is not clear where or how values will be identified.</li> <li>For values to be recognised and managed, they need to first be identified.</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Include an additional point: "<u>Provide for food production values.</u>"</li> <li>• Include methods for identification of values.</li> </ul>	
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	<ul style="list-style-type: none"> <li>• Amend Policy 2.1.5 as follows: "<u>Identify and recognise soil values and manage land to: ...</u>"</li> <li>• Include an additional point: "<u>Provide for food production values.</u>"</li> <li>• Retain: Maintain highly values soil resources.</li> </ul>	<ul style="list-style-type: none"> <li>• It is not clear where or how values will be identified.</li> <li>• For values to be recognised and managed, they need to first be identified.</li> <li>• Horticulture NZ supports the recognition of the soil resource for primary production and highly valued soil resources.</li> <li>• It should be clear that soil is valued for a range of purposes and should not necessarily be limited to versatility classes. The process of identification of soil values will assist in defining "highly valued soil resources".</li> </ul>
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Amend	Amend as follows: "Otago's significant and highly values natural resources are identified, and <u>managed to maintain or enhance the resource protected or enhanced.</u> "	<ul style="list-style-type: none"> <li>• Supports the identification of significant and highly values natural resources, but there may be a range of policy responses as a consequence of identification.</li> <li>• The wording of the objective only provides for "protect or enhance".</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	Amend Policy 2.2.14 as follows: <ul style="list-style-type: none"> <li>• a): "<u>Existence of necessary attributes for high value Degree-of-versatility for primary production.</u>"</li> <li>• Add new point: "<u>e) Importance for food production.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>• Horticulture NZ supports the recognition of the soil resource for primary production and highly valued soil resources.</li> <li>• It should be clear that soil is valued for a range of purposes and should not necessarily be limited to versatility classes.</li> <li>• A range of attributes are required for soil to be able to be used for food production and identifying and relying on soil classification does not present the full picture about the potential and value of the soil resource, e.g. availability of water.</li> <li>• The process of identification of soil values will assist in defining "highly valued soil resources".</li> <li>• The importance of the soil for food production should be listed as a criteria for identification of highly valued soil resources.</li> </ul>
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	<ul style="list-style-type: none"> <li>• Amend Policy 2.2.15 as follows: "<u>Provide for protect the values of area of highly valued land resources by: ...</u>"</li> <li>• Add new points as follows: <ul style="list-style-type: none"> <li>"<u>e) Controlling the adverse effects of pest species, prevent their introduction and reduce their spread and enable the removal and destruction of diseased material for biosecurity purposes.</u></li> <li>"<u>f) Enable the use of highly valued land resources through ensuring that attributes necessary for use of the resource are provided for.</u>"</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• The highly valued soil resources could be managed in a range of ways. A single policy to "protect" may not adequately provide for the management of the soil resources. In addition there should be recognition of the importance of managing pest species and the need for provision of other attributes to enable the soil resource to be able to be used.</li> <li>• The focus should be on the "land" as opposed to just the soil.</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Retain Objective 2.3.	<ul style="list-style-type: none"> <li>• The recognition of the interdependencies of natural resources is supported.</li> <li>• Soil resources do not exist in isolation from the range of other attributes that are essential for the soil resource to be able to be used to its potential.</li> </ul>
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Include provisions to recognise the interdependency of the soil resource with other attributes such as water availability.	<ul style="list-style-type: none"> <li>• The recognition of the interdependencies of natural resources is supported.</li> <li>• Soil resources do not exist in isolation from the range of other attributes that are essential for the soil resource to be able to be used to its potential.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Support	Retain Policy 2.3.1.	Support the application of an integrated management approach among resources. In particular highly valued soil resources do not exist in isolation from the range of other attributes that are essential for the soil resource to be able to be used to its potential.

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62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Amend	Amend Policy 2.3.3 as follows: • "c) iv. Reduce the potential for health and nuisance effects." • Add a new point " <u>d) Provide for food production.</u> "	<ul style="list-style-type: none"> <li>• An integrated management approach for freshwater catchments is supported.</li> <li>• It is unclear why nuisance effects are included. The focus should be on adverse effects as nuisance effects are not defined in the RMA.</li> </ul>
63	Natural systems and interdependencies	Policy 2.3.4 - Applying an integrated management approach for the coastal environment	Amend	Amend as follows: "b) ii. Reduce the potential for health and nuisance effects".	<ul style="list-style-type: none"> <li>• An integrated management approach for the coastal environment is supported.</li> <li>• It is unclear why nuisance effects are included. The focus should be on adverse effects as nuisance effects are not defined in the RMA.</li> </ul>
64	Natural systems and interdependencies	Policy 2.3.5 - Applying an integrated management approach for airsheds	Amend	Amend as follows: "b) ii) Reduce the potential for adverse health and nuisance effects."	<ul style="list-style-type: none"> <li>• An integrated management approach for the coastal environment is supported.</li> <li>• It is unclear why nuisance effects are included. The focus should be on adverse effects as nuisance effects are not defined in the RMA.</li> </ul>
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Support	Retain Objective 3.1.	Recognition of environmental constraints, such as sufficient water supply, is supported. For instance development of new urban areas should not compromise existing water takes.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend Policy 3.1.1 e) as follows: "e) The functional necessity for the activity to be located where there are significant constraints <u>such as adverse effects on existing activities.</u> "	<ul style="list-style-type: none"> <li>• One of the constraints listed is the functional necessity for the activity to be located where there are significant constraints.</li> <li>• While the concept is supported there needs to be guidance as to what determines "significance". One such constraint is impact on existing activities.</li> </ul>
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Add an additional point " <u>b) viii: Effects existing uses.</u> "	The policy also needs to recognise the existence of other land uses.
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend Policy 3.4.2 as follows: "e) <u>Managing infrastructure corridors for nationally important infrastructure needs, recognising the existing land uses through which they pass</u> <del>Protect infrastructure corridors for infrastructure needs, now and for the future; and...</del> "	<ul style="list-style-type: none"> <li>• Proposed e) is of concern to existing land owners who have infrastructure corridors on their properties.</li> <li>• There is no differentiation between nationally important or regionally important infrastructure and other infrastructure. A more appropriate approach is to "manage" infrastructure corridors, which may include protection for nationally significant infrastructure.</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Support	Retain Objective 3.5 and ensure that the balance is reflected in Objective 3.4.	Recognition of both the benefits and potential adverse effects of infrastructure is supported. It provides a balance that is missing in Objective 3.4.
103	Infrastructure of national or regional significance	Policy suite 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Include a new policy with criteria to assist with how national and regional significance will be determined.	It is unclear how national and regional significance will be determined.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	<ul style="list-style-type: none"> <li>• Amend b) as follows: "<u>b) The National Grid Electricity transmission infrastructure; and</u>".</li> <li>• Add an additional point: "<u>g) Irrigation infrastructure where it is regionally significant.</u>"</li> </ul>	The importance of infrastructure is recognised but Policy 3.5.1 b) needs to ensure that the focus is on national and regional significance, not local distribution.
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	Amend Policy 3.5.3 as follows: "e) <u>Managing infrastructure corridors for nationally important infrastructure needs, recognising the existing land uses through which they pass</u> <del>Protecting infrastructure corridors for infrastructure needs, now and for the future.</del> "	<ul style="list-style-type: none"> <li>• e) is of concern to existing land owners who have infrastructure corridors on their properties.</li> <li>• A more appropriate approach is to "manage" the infrastructure corridors, which may include protection for nationally significant infrastructure.</li> </ul>
107	Objectives on resilience, health and safety	Objective 3.6 - Energy supplies to Otago's communities are secure and sustainable	Support	Retain Objective 3.6.	No reason given.
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	Amend as follows: " <u>Managing</u> <del>Protect</del> electricity distribution infrastructure, by: ... c) <u>Ensuring existing land uses are not penalised by location of electricity distribution</u> "	<ul style="list-style-type: none"> <li>• Policy 3.6.5 appears to apply to all electricity distribution infrastructure, whether nationally significant or not.</li> <li>• It is not appropriate to apply the same level of "protection" to all infrastructure as it places a priority over existing land uses which can be adversely affected by the location of electricity distribution infrastructure.</li> </ul>

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				<p><del>infrastructure. Avoiding, remedying or mitigating adverse effects from other activities on the functional needs of that infrastructure; and ...</del></p> <p>e) <u>Protect infrastructure corridors for nationally important infrastructure needs, recognising the existing land uses through which they pass</u></p> <p><del>Protecting existing distribution corridors for infrastructure needs, now and for the future."</del></p>	
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Support	Retain Objective 3.8.	Recognition and management of the rural/ urban interface is supported, particularly where there is high value land resources.
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	<ul style="list-style-type: none"> <li>Amend Policy 3.8.1 c) i) as follows: "c) i. <u>Avoid, where possible, minimise</u> adverse effects on rural productivity, including loss of highly valued land or creating competing urban demand for water and other resources ; and ..."</li> <li>Retain Policy 3.8.1 e) "Ensuring efficient use of land".</li> </ul>	<ul style="list-style-type: none"> <li>Policy 3.8.1 c) i) is supported, including for highly valued land.</li> <li>The focus should be on the "land" not just the soil resource, as there are other attributes which also need to be recognised.</li> <li>The policy only seeks that adverse effects are minimised. It is considered that there should be a policy to "avoid where possible".</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<ul style="list-style-type: none"> <li>Retain Policy 3.8.3 a).</li> <li>Amend Policy 3.8.3 b) by replacing "highly versatile soil" with "<u>highly valued land</u>".</li> <li>Retain Policy 3.8.3 b) iii).</li> <li>Retain Policy 3.8.3 c) and d).</li> </ul>	<ul style="list-style-type: none"> <li>The approach in Policy 3.8.3 is supported however it refers to "highly versatile soil" where as previous policies refer to "highly valued soils" which are to be identified.</li> <li>Recognition of reverse sensitivity effects on rural production is supported.</li> </ul>
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	<ul style="list-style-type: none"> <li>Clarify what "other values" will be considered under Policy 3.9.2 c).</li> <li>Amend Clause e) by adding: "<u>except for agrichemicals and fertilisers as part of primary production activities</u>".</li> <li>Add a new clause: "<u>g) Provide for the use and disposal of agrichemicals and fertilisers as part of primary production activities through using best practice.</u>"</li> <li>Add a new clause: "<u>h) Recognise the positive effects that can be derived from use of hazardous substances.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>The policy should be clearer as to what "other values" are relevant in c).</li> <li>There needs to be provisions for disposal of agrichemicals and fertilisers on farm through using best practice. Policy 3.9.2 e) only refers to "authorised facilities".</li> </ul>
132	Hazardous substances and waste	Policy 3.9.3 - Identifying contaminated land	Amend	Delete " <u>potentially contaminated land</u> " from Policy 3.9.3.	<ul style="list-style-type: none"> <li>Identification of contaminated land is supported.</li> <li>This is different from determining "potentially contaminated land": There needs to be clear direction as to how it may be identified and what is done with any information. The whole of the rural area in Otago could be identified as "potentially contaminated land" if some criteria are applied.</li> <li>Policy 3.9.4 which implements Policy 3.9.3 only refers to contaminated land – that is known contaminated land.</li> </ul>
135	Hazardous substances and waste	Policy 3.9.6 - Encouraging use of best management practices for hazardous substance use	Support	Retain Policy 3.9.6.	No reason given.
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for economic production	Support	Retain Objective 4.3	Recognition of the importance of land for primary production is supported.
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	<p>Retain Policy 4.3.1 but amend as follows:</p> <ul style="list-style-type: none"> <li>Delete "<u>for their versatility</u>" from b).</li> <li>Retain Policy 4.3.1 c).</li> <li>Add a new point: "<u>Provides for food</u></li> </ul>	<ul style="list-style-type: none"> <li>Recognition of the importance of land for primary production is supported. However there should be specific inclusion of "food production".</li> <li>Clause b) refers to soil highly valued for their versatility. Other</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><u>production.</u></p> <ul style="list-style-type: none"> <li>• Add a new point: "<u>Controlling the adverse effects of pest species, prevent their introduction and reduce their spread and enable the removal and destruction of diseased material for biosecurity purposes.</u>"</li> </ul>	<p>policies seek the identification of highly valued soil and Policy 4.3.1 should not preclude that process.</p> <ul style="list-style-type: none"> <li>• Include managing pests and biosecurity risks and incursions.</li> </ul>
161	Objectives on use and enjoyment of natural and built environment	Objective 4.4 - Otago's communities can make the most of the natural and built resources available for use	Support	Retain Objective 4.4.	Efficient use of resources is supported.
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	Retain Policy 4.4.1 but clarify in what circumstances an upgrade of infrastructure would be "required" under Policy 4.4.1 b).	Efficient allocation and use of water is essential. The policy approaches are generally supported. However it needs to be clear in what circumstances an upgrade of infrastructure would be "required".
166	Objectives on use and enjoyment of natural and built environment	Objective 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Amend	Amend as follows: "Adverse effects of using and enjoying Otago's natural and built environment are <u>avoided remedied or mitigated minimised.</u> "	The objective should be consistent with the RMA and seek that adverse effects are avoided remedied or mitigated.
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Amend	Amend Policy 4.5.1 " <u>Objectionable adverse effects from discharges are avoided remedied or mitigated</u> Avoiding objectionable discharges."	<ul style="list-style-type: none"> <li>• The policy should be consistent with the RMA and seek that adverse effects are avoided remedied or mitigated.</li> <li>• A policy of "avoidance" is too absolute given there is no direction on what may be regarded as "objectionable".</li> </ul>
172	Management of adverse effects	Policy 4.5.5 - Controlling the introduction and spread of pest plants and animals	Amend	<ul style="list-style-type: none"> <li>• Amend as follows: "Control the adverse effects of pest species, prevent their introduction and reduce their spread <u>and enable the removal and destruction of diseased material for biosecurity purposes</u> to safeguard: ..."</li> <li>• Add a new point: "<u>h) primary production activities.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>• Horticulture NZ is particularly supportive of controlling the adverse effects of pest species, preventing their introduction and reducing their spread in a number of policies in the RPS.</li> <li>• Biosecurity and prevention of introduction of unwanted organisms that are a threat to horticultural crops is a key issue for growers.</li> <li>• In the event of a biosecurity incursion there is the need to be able to respond rapidly to manage spread and management may require the support of both regional and district plans. These organisms cannot be included in a Regional Pest Management Strategy as they are not currently in NZ.</li> <li>• Even biosecurity emergencies may not override the need for consideration of regional and district plan rules.</li> <li>• Policy 4.5.5 is supported, but specific reference to unwanted organisms and primary production are sought.</li> </ul>
172	Management of adverse effects	Policy 4.5.5 - Controlling the introduction and spread of pest plants and animals	Amend	<ul style="list-style-type: none"> <li>• Amend as follows: "Control the adverse effects of pest species, prevent their introduction and reduce their spread <u>and enable the removal and destruction of diseased material for biosecurity purposes</u> to safeguard: ... <u>h) primary production activities.</u>"</li> <li>• Any consequential amendments are sought as required to give effect to decisions sought in this submission.</li> </ul>	<ul style="list-style-type: none"> <li>• Horticulture NZ is particularly supportive of controlling the adverse effects of pest species, preventing their introduction and reducing their spread in a number of policies in the RPS.</li> <li>• Biosecurity and prevention of introduction of unwanted organisms that are a threat to horticultural crops is a key issue for growers.</li> <li>• The policies and methods of implementation do not clearly address how an incursion may be managed.</li> <li>• In the event of a biosecurity incursion there is the need to be able to respond rapidly to manage spread and management may require the support of both regional and district plans. These organisms cannot be included in a Regional Pest Management Strategy as they are not currently in NZ.</li> <li>• Even biosecurity emergencies may not override the need for consideration of regional and district plan rules.</li> <li>• Horticulture NZ seeks that provisions are included in the RPS that provide overall direction to both regional and district plans to managing such incursions of unwanted organisms. Such management may involve removal and disposal of material by burning or burying or application of agrichemicals, including in riparian areas.</li> </ul>
177	Roles and responsibilities	Roles and responsibilities	Amend	Amend Regional Council Roles and	<ul style="list-style-type: none"> <li>• There needs to be clarity that application of agrichemicals are</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				responsibilities as follows: <ul style="list-style-type: none"> <li>Amending b) i): "prevent or mitigate the actual or potential adverse effects of discharges of hazardous substances to land or air <u>or water</u>;"</li> <li>Add new point b) iii): "<u>all aspects of agrichemical management including storage and disposal</u>."</li> </ul>	managed as a discharge to air and not as a use under district councils. <ul style="list-style-type: none"> <li>It is Horticulture NZ's preference that all aspects of agrichemical management are included as a regional council function, including storage and disposal</li> <li>There should also be provision for Regional Council to manage discharges of hazardous substances to water as this is necessary for aquatic weed control in some situations.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Add new Method 3.1.6: " <u>Regional Plan will set objectives, policies and methods to implement provisions for management of pest species and in particular removal and disposal of unwanted organisms for biosecurity purposes.</u> "	Include an additional point about management of unwanted organisms for biosecurity purposes.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	<ul style="list-style-type: none"> <li>Add new Method 4.1.13: "<u>City or District Plans will set objectives, policies and methods to implement provisions for management of pest species and in particular removal and disposal of unwanted organisms for biosecurity purposes.</u>"</li> <li>Amend Method 4.1.7: "City or district plans will implement Policy 3.9.2 including by managing the actual or potential adverse effects of the use or storage of hazardous substances including on:"</li> </ul>	<ul style="list-style-type: none"> <li>Method 4.1.13: Include an additional point about management of unwanted organisms for biosecurity purposes.</li> <li>Method 4.1: There needs to be recognition that use of hazardous substances can also have positive effects, not just adverse effects.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend Method 6.1.3 as follows: "(c) Identify highly valued <del>land</del> <u>soil</u> resources."	The focus of this method should be on highly valued land resources rather than highly valued soil resources.
199	Method 6 - Research, Monitoring and Reporting	Method 6.2 - Research	Amend	<ul style="list-style-type: none"> <li>Amend Method 6.2.1 a) by adding "<u>freshwater values</u>" after "catchment values".</li> <li>Amend Method 6.2.1 d) to "The location and extent of <del>high class and versatile soil in Otago highly valued land resources</del>".</li> <li>Amend Method 6.2.1 e) by deleting "<del>or potentially</del>".</li> </ul>	<ul style="list-style-type: none"> <li>The identification of catchment values is supported and should specifically refer to freshwater values as required by the NPSFM.</li> <li>Method 6.2.1 d) should be about the location and extent of highly valued land resources, which may include versatile soils.</li> <li>Method 6.2.1 e) should be amended to delete "or potentially contaminated land". It is inappropriate that land that is unconfirmed as being contaminated is identified in a register of sites. Where land is confirmed as being contaminated identification on a register is appropriate.</li> </ul>
207	Method 7 - Strategies and Plans (non-RMA)	Method 7.4 - Pest management strategy	Amend	Add a note that "Provisions will be included in RMA Plans to provide for [the] management [of] unwanted organisms that may enter Otago to ensure that biosecurity risks are managed".	<ul style="list-style-type: none"> <li>Pest management strategies are for known species that currently exist.</li> <li>Provisions are sought in RMA Plans to provide for management unwanted organisms that may enter Otago to ensure that biosecurity risks are adequately managed.</li> </ul>
230	Anticipated Environmental Results	AER 2.2 - Otago's water bodies support healthy ecosystems, are safe for swimming, and maintain their natural form and character	Amend	Amend as follows: "Otago's water bodies support healthy ecosystems, <u>maintain their natural form and character and where identified in regional plans are safe for swimming</u> <del>are safe for swimming, and maintain their natural form and character.</del> "	<ul style="list-style-type: none"> <li>The NPSFM does not require that all water bodies are at a swimming contact recreation standard.</li> <li>The Regional Plan should identify those areas where a higher standard for swimming is sought and not apply generically across the whole region.</li> </ul>
249	Glossaries	Glossary	Amend	Amend definition of "Highly valued soils" as follows: <ul style="list-style-type: none"> <li>a) "<u>Existence of necessary attributes for high value primary production versatility for primary production, such as highly versatile soils;</u></li> <li>Add new point: "<u>e) Importance for food production</u>".</li> </ul>	Horticulture NZ has sought changes to the criteria in Policy 2.2.14 so seeks that additional matters are included in the glossary.
249	Glossaries	Glossary	Support	Retain definition of "reverse sensitivity".	Inclusion of a definition of reverse sensitivity is supported.
249	Glossaries	Glossary	Oppose	Delete definition of "highly versatile soils".	<ul style="list-style-type: none"> <li>The RPS should rely on highly valued soils so a definition of highly</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					versatile soils is not required. <ul style="list-style-type: none"> <li>The identification of highly values resources may include versatile soils, but not necessarily limited to such soils.</li> </ul>
265	Chapter B2 - High quality natural resources	Outcome 2 and introduction	Amend	Introduction to Part B Chapter 2 (p. 23): Support the recognition of primary production as an important sector and for the social and economic wellbeing of the community and the reliance on the quantity and quality of natural resources.	No reason given.
285	Objectives on resilience, health and safety	Introduction to Objective 3.4	Amend	Amend Objective 3.4 by adding to the explanation (p. 56): " <u>It is also recognised that there needs to be consideration of existing uses and ensure that competing interests are adequately managed.</u> "	<ul style="list-style-type: none"> <li>The importance of infrastructure is recognised but sometimes the location and operation needs to be balanced with other activities in the area.</li> <li>The RPS needs to ensure that the competing interests can be adequately managed without creating an absolute priority for infrastructural requirements.</li> </ul>
290	Objectives on resilience, health and safety	Introduction to Objective 3.9	Amend	Amend the the second sentence of the Explanation to Objective 3.9 (p. 70) by replacing " <del>hazardous substances are dangerous</del> " with " <u>hazardous substances can present risks when not managed appropriately.</u> "	<ul style="list-style-type: none"> <li>The approach of HSNO is to reduce the risk of hazardous substances, if a substance is inherently dangerous then appropriate controls are placed on its management.</li> <li>The RPS should reflect the approach of HSNO. In particular rural production activities use hazardous substances and need to be provided for.</li> </ul>

### 125 Tautuku Block X Section 3C Trust

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
7	Chapter B1 - Kai Tahu values	Chapter B1 - general requests	Oppose	We believe significant rewording of the Kai Tahu and takata whenua sections will be required to recognise submitter's participation in the RPS process.	<ul style="list-style-type: none"> <li>Consultation with Otago Maori landowners contained virtually no Kai Tahu or takata whenua issues and therefore participants were unable to engage in any meaningful dialogue. This process fails to meet the minimum requirements for consultation as set out in the Court of Appeal and are little better than a charade.</li> <li>The Council has not fulfilled the requirements of RMA sections 6(e), 7(a) and 8, and clause 4 and Parts 2 and 5 of the Local Government Act.</li> </ul>
250	Glossaries	Glossary of Te Reo terms	Amend	The definition of "rakatirataka" should be removed from the glossary of Te Reo terms.	This term is not included in the RMA and introduces an additional level of complication to the process.
252	Other comments	Process	Not Applicable	The failure to undertake meaningful consultation during the drafting process may require re-notification of the document	<ul style="list-style-type: none"> <li>Consultation with Otago Maori landowners contained virtually no Kai Tahu or takata whenua issues and therefore participants were unable to engage in any meaningful dialogue. This process fails to meet the minimum requirements for consultation as set out in the Court of Appeal and are little better than a charade.</li> <li>The Council has not fulfilled the requirements of RMA sections 6(e), 7(a) and 8, and clause 4 and Parts 2 and 5 of the Local Government Act.</li> </ul>

### 126 Clutha Agricultural Development Board

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Support	<ul style="list-style-type: none"> <li>General support of Policies 2.1.1, 2.1.2 and 2.1.3.</li> <li>Use a qualifier to outline what "degradation" means, and / or define "degradation" in the RPS Glossary.</li> </ul>	The use of the word "degraded" in Policy 2.1.1 f) and 2.1.2 c) needs to be clarified: What is the basis for assuming a water body has degraded? Does degraded mean if the quality is greater than what the Water Plan requires in Schedule 15 (table 1 and 2) and schedule 16?
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	<ul style="list-style-type: none"> <li>Amend Policy 2.1.5 as follows: "Recognise soil values, and manage soils, to: ... b) Maintain <u>and enhance</u> soil biodiversity; and c) Maintain <u>and enhance</u> biological activity in</li> </ul>	<ul style="list-style-type: none"> <li>There appears to be a lack of understanding what soil values mean and what this may involve to ensure sustainable soils and farm systems continue in Otago.</li> <li>There is considerable soil erosion occurring all the time on farmland and non-farm land which can be initiated by gravity, wind, man</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				soils; and ... j) To maintain <u>and retain</u> highly valued soil resources); and ..." • Add policy similar to 2.1.1(o) in relation to the Land Use Capability class land subject to erosion LYC class 1-4, e.g. " <u>Mitigate the adverse effects of natural hazards, including erosion (or more specific soil erosion)</u> ".	induced and the like along with the water influence. • Under 2.1.5 part (b) and (c) are insufficient in their intent as many soils in Otago may be below the threshold for biodiversity and biological activity due to for example poor drainage, site location, slope, parent material, their age to name some aspects. So just to maintain will not result in a long term sustainable soil system. • Section (j) states maintain highly valued soil resources. The policy should be amended to take on board the importance of not only maintaining the resource but retaining it wherever possible and practical for primary production if it is "High Class" definition soil.
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	• We support [Policy 2.1.6 a) to h)]. • Add following clause: " <u>i) Avoid and manage pest species by using Integrated Pest Control Methods.</u> "	More effort and initiative must go into promoting more integrated pest management (IPM) including cultural, biological, chemical and physical methods to be implemented as practical which in the long term will result in cost effective biodiversity management.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Delete d) " <del>recognising that urban expansion may be appropriate due to location and proximity to existing urban development and infrastructure.</del> "	The statement is very open and allows easy scope for expansion onto the best high class soils even if they are the most versatile soils in Otago with minimal limitations.
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend Policy 3.8.3 by either: • Deleting Policy 3.8.3 b) ii. " <del>there highly versatile soils are needed for urban expansion, any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and - ..</del> " • Or, refining it.	• Wherever possible urban subdivision must not be allowed to develop onto versatile and / or high class soils. • Changes in relation to this Policy should be linked to changes in Policy 2.2.15.
249	Glossaries	Glossary	Amend	Amend definition of "Highly versatile soils" as follows: "Land classified as Land Use Capability 1 or 2 <u>and 3e</u> in the New Zealand Land Resource Inventory"	• Refine terminology to be consistent with the terminology used elsewhere in NZ especially on District Plans. • The term "Highly valued soils" is not consistent with "High Class soils" in particular in relation to Environment Court hearings. • The definition of "high class land" used by landcare is "land that is capable of being used intensively to produce a wide variety of crops, including arable crops". "Versatile soils are classified as LUC 1, 2 or 3e on the NZ Land Inventory Worksheets (...), provided that land classified as class 3e is further described as containing well drained and moderately well drained soil(...)" (Chapman, 2010).

### 127 Environmental Defence Society Incorporated

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Overall approach	Whole Regional Policy Statement (general opposition)	Oppose	• Withdraw the RPS; or • Amend so as to promote the sustainable management of natural and physical resources in the region, to comply with the RMA and to give effect to the relevant national policy statements [• Other specific relief sought in submission.]	• The PRPS does not meet the requirements of the RMA. • The PRPS does not give effect to the New Zealand Coastal Policy Statement 2010 (NZCPS) and the National Policy Statement for Freshwater Management 2014 (NPSFM). • It is contrary to sound resource management practices. • It will allow the generation of significant adverse effects on the environment that warrant being addressed.
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	New objectives, policies and methods are required in order for each resource to be adequately addressed.	Specific examples are addressed below in relation to key areas of concern; however this issue arises across the entire plan.
6	Overall approach	Schedule 3 - Significance threshold	Amend	• The introduction to the schedule should identify that the identification of significant adverse effects is only relevant in areas not subject to a requirement to avoid adverse effects. • Consideration 2 should address the importance of proximate resources.	• Consideration 2 - Activities on areas adjacent to high values areas can also affect those areas. • Consideration 3 - For example, each individual housing unit of an application for 20 small hotel units may not be significant, but in combination they take up a significant area.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Consideration 3 should identify that "size" can refer to an activity located in a single area or multiple pockets of activities.</li> <li>• Consideration 9 should identify how well the area can absorb change.</li> </ul>	
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	<p>Include a chapter focused on the coastal environment [biodiversity and Significant Ecological Areas (SEAs)] and incorporating the necessary provisions to respond to these submissions [i.e.</p> <ul style="list-style-type: none"> <li>• Specific resource management issues relating to biodiversity and SEAs;</li> <li>• Specific objectives relating to biodiversity and SEAs;</li> <li>• Provisions relating to biodiversity and SEAs in the marine environment;</li> <li>• Provisions identifying activities which adversely affect biodiversity and SEA areas, and providing a course of action to respond to these;</li> <li>• A complete and specific set of criteria for a valid biodiversity offset and for assessing "significance".]</li> </ul> <p>Examples of biodiversity and SEA provisions are attached in Annexure 2-D.</p>	<ul style="list-style-type: none"> <li>• EDS supports a number of the relevant provisions in the RPS, for example the requirement to achieve no-net-loss in biodiversity.</li> <li>• The provisions in the PRPS do not go far enough to protect the persistence of biodiversity and ecosystem function.</li> <li>• Biodiversity contributes to freshwater, natural character, landscape and amenity values.</li> <li>• The PRPS must implement the Council's functions with regard to biodiversity and ecosystems, and must give effect to NZCPS Policy 11.</li> <li>• The PRPS fails to provide sufficient policy direction to achieve the requirements of the RMA (sections 5(2)(b) and 6(c)) and the NZCPS. (Refer to paragraph 29 for reasons why).</li> <li>• It is highly unusual to have one objective covering freshwater, coastal water, air, soil, biodiversity, landscape and natural character.</li> <li>• The PRPS fails to identify clear objectives for [biodiversity and SEAs] in the Otago region.</li> </ul>
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	<p>Include a chapter focused on Outstanding Natural Features and Landscapes (ONFLs) and incorporating the necessary provisions to respond to the specific submissions contained in EDS' submission [i.e.:</p> <ul style="list-style-type: none"> <li>• Regionally significant issues relating to ONFLs;</li> <li>• Specific objectives relating to ONFLs - See examples in Annexure 2-B of the EDS submission.;</li> <li>• Policies and methods which clearly identify the activities which must be managed and how in order to protect the integrity of ONFLs and amenity landscapes.]</li> </ul>	<ul style="list-style-type: none"> <li>• The level of protection given to ONFLs is not sufficient to effectively ensure their protection from individual or cumulative impacts, and does [not] fulfil the requirements of Section 6(b) and 7 of the RMA, or Policy 15 NZCPS.</li> <li>• It is highly unusual to have one objective covering freshwater, coastal water, air, soil, biodiversity, landscape and natural character.</li> <li>• The RPS fails to identify clear objectives for freshwater [ONFLs] in the Otago region.</li> </ul>
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	<p>Include a chapter focused on freshwater and incorporate the necessary provisions [i.e.:</p> <ul style="list-style-type: none"> <li>• Regionally significant issues relating to freshwater;</li> <li>• Objectives relating to freshwater, including provision for the environmental bottom lines in the NPSFM;</li> <li>• A freshwater management framework addressing water quality and quantity, as required under section CA of the NPSFM;</li> <li>• Policies and methods addressing the management of effects (including cumulative effects) of subdivision and development to reduce impacts on water quality and on water quantity;</li> <li>• Recognition and provision for the preservation</li> </ul>	<ul style="list-style-type: none"> <li>• Some of New Zealand's most outstanding freshwater bodies are located in Otago: it is critical that the RPS contains a robust policy framework to ensure that the region's freshwater bodies are adequately protected.</li> <li>• The RPS does not fulfill the RMA and NPSFM requirements in relation to freshwater.</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				of the natural character of wetlands, and lakes and rivers and their margins, and their protection from inappropriate subdivision, use and development; • Protection of all wetlands.	
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	Develop specific measureable objectives addressing freshwater, and covering inter alia: • The safeguarding of the life-supporting capacities, ecosystem process and indigenous species and their associated ecosystems of freshwater. • Avoiding further over-allocation and phasing out existing over-allocation. • Improving and maximizing the efficient allocation and efficient use of water. • Protecting significant values of wetlands and of outstanding freshwater bodies. For example, see provisions attached in Annexure 2-A.	<ul style="list-style-type: none"> <li>Objective 2.1, 2.2 &amp; 2.3, 4.4, 4.5 fail to clearly identify what is to be achieved, where, when and by whom.</li> <li>They fail to identify a specific goal for each specific environmental element. It is highly unusual to have one objective covering freshwater, coastal water, air, soil, biodiversity, landscape and natural character.</li> <li>The RPS fails to identify clear objectives for freshwater in the Otago region.</li> </ul>
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	<p>Include a chapter focused on the coastal environment and incorporating the necessary provisions [i.e.:</p> <ul style="list-style-type: none"> <li>Significant resource management issues faced by the Otago region in the coastal environment;</li> <li>Specific objectives for the coastal environment.</li> <li>Policies to: <ul style="list-style-type: none"> <li>Provide for a precautionary approach;</li> <li>Provide for a comprehensive integrated management regime which identifies where and how to provide for future development in the coastal environment;</li> <li>Identify areas where particular activities and forms of subdivision use and development are inappropriate or require consent;</li> <li>Identify what types of activities are inappropriate and provide criteria for determining the appropriateness of activities;</li> <li>Include provisions relating to aquaculture, reclamation, restoration, of natural character areas and public access;</li> <li>Address coastal water quality and identify a clear course of action re: identification of degraded areas, sedimentation issues and the discharge of contaminants into coastal waters.</li> </ul> </li> </ul> <p>Examples of provisions are attached in Annexure 2-C to the submission.</p>	<ul style="list-style-type: none"> <li>The RPS fails to implement the RMA, the purpose and content of a RPS and the NZCPS</li> <li>The PRPS fails to consider a number of policies of the NZCPS, including Policies 3, 7(1)(a) and (b), 6, 8, 10, 14 and 18.</li> <li>It is highly unusual to have one objective covering freshwater, coastal water, air, soil, biodiversity, landscape and natural character.</li> <li>The RPS fails to identify clear objectives for coastal water in the Otago region.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	<ul style="list-style-type: none"> <li>Re-classify as a series of objectives identifying the key freshwater outcomes sought. Appropriate policies will [be] needed to complement each objective.</li> <li>Amend the chapeau to identify the activities which need to be managed in order to achieve the outcomes sought in clauses (a) - (p).</li> </ul>	<ul style="list-style-type: none"> <li>Policy 2.1.1 is more of an objective than a policy. It does not provide a "course of action" for how specific outcomes are to be achieved. These should be specified individually, with specific policies and methods detailing how they are to be achieved.</li> <li>The policy refers to management of freshwater in order to achieve a list of outcomes. It does not provide any direction as to what should be managed.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>Amend clause (c) to clarify that protection of the significant values of all wetlands is required.</li> <li>Amend clause (g) to clarify the relationship between coastal and freshwater values, for example through identifying transition areas where fresh and coastal waters intersect.</li> <li>Amend clause (l) to refer to maintenance of water quality and other freshwater attributes such as flow, required for recreation purposes.</li> <li>Amend clause (k) to refer to preventing pest species as far as possible.</li> <li>Amend clause (p) to provide for the maintenance of existing infrastructure within freshwater limits.</li> </ul>	<ul style="list-style-type: none"> <li>Clauses (a) and (b) are supported. They are consistent with Objectives A1(a) and B1 NPSFM.</li> <li>Clause (c): The protection of outstanding water bodies is consistent with Objectives A2 and B4 NPSFM. However, the protection of wetlands in the NPSFM is focused on the significant values of all wetlands not just those that are outstanding.</li> <li>Clause (f) is supported. It is consistent with the requirement in Objective A2 NPSFM to maintain or improve the overall quality of fresh water within the region.</li> <li>Clause (g) is supported in principle. It is appropriate to locate this matter in the context of freshwater as it is predominately land use and freshwater which impact coastal water quality through runoff and sediment. This relationship between coastal and freshwater values could be clearer.</li> <li>Clause (h) is supported.</li> <li>Clause (i) is supported. It is consistent with Section 14(3)(b)(i) RMA which provides for the take and use of water for domestic needs, the NES Sources of Drinking Water and Objective A1(a) NPSFM.</li> <li>Clause (l) is supported in part.</li> <li>Clause (k) is supported is supported in part. Unfortunately, the spreading of pest species cannot be completely avoided.</li> <li>Clause (p) is supported in part. Although it is important for existing infrastructure to continue to function it must operate within freshwater limits.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	<ul style="list-style-type: none"> <li>Re-classify as a series of objectives identifying the key freshwater outcomes sought, where appropriate. Appropriate policies will need to complement each objective.</li> <li>Amend clauses (a)-(l) to respond to the concerns outlined.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 2.1.2 is more of an objective than a policy. It does not provide a "course of action".</li> <li>As with Policy 2.1.1 clause (a)-(l) identify a series of goals specific to freshwater bodies, many of which repeat the outcomes identified in that policy.</li> <li>Clause (a): Clarification is required as to what "natural functioning" encompasses.</li> <li>Clauses (b), (c), (g), (h), and (j) are subject to the same concerns as their counterparts in Policy 2.1.1 (see EDS's submission on Policy 2.1.1).</li> <li>Clause (d): Enhancement of ecosystem health of all biodiversity should be required, as freshwater ecosystems and biodiversity are critical values. Their enhancement is a key factor in achieving improvement of overall water quality. Objective A2 NPSFM requires that freshwater is maintained or improved, while protecting the significant values of freshwater. Pursuant to section 30(c)(iia) RMA the Council is charged with both maintaining and enhancing freshwater ecosystems.</li> <li>Clause (f): Enhancement as well as maintenance of habitats should be required.</li> <li>Clause (f) and (i): Further clarity is required.</li> </ul>
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Reclassify as part of a series of coastal specific objectives.	This is more of an objective than a policy. The goals identified in clause (a)-(i) are generally supported, but are extremely broad. Further information is required in order to ensure they are sufficiently specific, measurable, and give effect to the NZCPS.
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	<ul style="list-style-type: none"> <li>Reclassify as a series of objectives.</li> <li>Amend clause (a) as follows: "Objective: <u>Maintain the full range of ecosystem and habitat types in the region and maintain or enhance their spatial extent and ecosystem health and functioning</u> Maintain or enhance ecosystem health and indigenous biodiversity."</li> </ul>	<ul style="list-style-type: none"> <li>This policy is more readily classified as an objective, or series of objectives.</li> <li>Clause (a) is supported in principle. It is consistent with section 30(1)(ga). Amendments are required in order to improve clarity over what is to be maintained and enhanced.</li> <li>Clause (f) is opposed. The purpose of maintaining habitations and ecosystems should not be focused on commercial gains or</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				• Delete clause (f).	recreational uses.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Oppose	Delete.	The intended utility of Policy 2.1.7 is not clear given that it does nothing other than repeat the identification criteria in Schedule 4.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Amend	EDS supports the criteria however an assessment methodology is required. This should identify that the identification of ONFLS is a three step process comprising: <ul style="list-style-type: none"> <li>• Identification of the landscape unit boundaries.</li> <li>• Ascertaining whether a landscape is sufficiently natural, acknowledging that there is a spectrum of naturalness and that a landscape does not have to be pristine to be considered natural.</li> <li>• Assessing whether the landscape is outstanding at a regional level, such that it is conspicuous, remarkable and stands out from the rest.</li> </ul>	<ul style="list-style-type: none"> <li>• In the absence of mapping, comprehensive and clear criteria are required.</li> <li>• Identification of ONFLS is three step process - see for example, High Country Rosehip Orchards v Mackenzie District Council 2011 NZEnvC C387.</li> </ul>
39	Natural resource value management - general	Policy 2.1.8 - Recognising the values of natural character in the coastal environment	Amend	<ul style="list-style-type: none"> <li>• Retain the identification criteria.</li> <li>• Insert an identification methodology to complement the criteria.</li> <li>• Relocate the criteria to a schedule and insert a cross-reference to that schedule.</li> </ul>	<ul style="list-style-type: none"> <li>• It is important criteria for identifying natural character are clearly identified in the RPS to ensure consistent identification across the region and its districts.</li> <li>• The criteria provided align with the criteria in Policy 13(2) NZCPS.</li> <li>• It is not clear why the identification criteria have been identified in the policy as opposed to a schedule, as has been used for other identification criteria.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Apply the same management approach to the natural character of wetlands, and lakes and rivers and their margins as to the coastal environment, i.e. avoidance of adverse effects on outstanding areas and avoidance of significant adverse effects, and avoidance, remediation and mitigation of other adverse effects in other areas.	Section 6(a) RMA does not distinguish between the natural character of the coastal environment and the natural character of wetlands, and lakes and rivers and their margins.
42	Highly valued natural resources - indigenous biodiversity	Policy 2.2.1 - Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna	Support	Retain.	Identifying SEAs is supported. It is critical that the RPS provide robust and comprehensive criteria.
43	Highly valued natural resources - indigenous biodiversity	Schedule 5 - Criteria for the assessment of significant indigenous vegetation and habitat of indigenous fauna	Amend	<ul style="list-style-type: none"> <li>• Retention of the 5 criteria headings.</li> <li>• Changes to align with, or substitution with EDS's preferred wording for <ul style="list-style-type: none"> <li>- significant ecological areas criteria</li> <li>- significant ecological marine areas criteria [refer to submission].</li> </ul> </li> </ul>	It is critical that the RPS provide robust and comprehensive criteria.
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	<ul style="list-style-type: none"> <li>• Delete clauses (e) and (d).</li> <li>• Amend clause (b) to read: "Avoiding significant adverse effects of <u>inappropriate subdivision, use and development</u> on other values of the area or habitat <u>and avoid, remedy or mitigate other adverse effects.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>• The direction to protect and enhance the values of SEAs is supported. It is consistent with sections 6(c), 7(d) and 7(F) RMA.</li> <li>• Clauses (a) and (b) are supported.</li> <li>• Clause (c) is supported in principle. Its adequacy will turn on the appropriateness of the identified criteria.</li> <li>• Clauses (e) and (d) are opposed. It is not clear that remediation and mitigation are only appropriate in situations where avoidance of adverse effects is not required.</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Retain and insert an identification methodology to support the criteria.	<ul style="list-style-type: none"> <li>• The identification of ONFLs is supported. EDS's preferred approach is for ONFLs to be mapped and incorporated into the RPS. This ensures consistency in identification.</li> <li>• In the absence of mapping comprehensive and clear criteria are</li> </ul>

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46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Restructure Policy 2.2.4 to comprise of: i. An objective seeking to protect ONFLs from inappropriate subdivision, use and development. ii. An objective seeking to promote restoration and enhancement of ONFLs. iii. Deletion of clause (c). iii. The division and reworking of clauses (a) - (f) into a suite of policies responding to the concerns outlined [see reasons]. See examples in Annexure 2-B.	required. These are set out in Schedule 4 which is discussed below. <ul style="list-style-type: none"> <li>• Policy 2.2.4 is supported in principal.</li> <li>• The policy fails to identify what they are being protected from. This is more of an objective than a policy.</li> <li>• The restoration and enhancement of ONFLs is supported where it is consistent with the identified outstanding values. This is more of an objective than a policy.</li> <li>• The policy attempts to cover a number of different courses of action which should be divided into individual policies.</li> <li>• The avoidance of adverse effects on ONFLs is supported. The focus should be on the "outstandingness" of the area, rather than on values which contribute to the significance of the ONFLs.</li> <li>• The policy fails to identify the need to avoid cumulative adverse effects.</li> <li>• It is not clear what is intended by the requirement avoid, remedy or mitigate other adverse effects on other values. There is no guidance as to what these "other values" are.</li> <li>• There is no direction as to how avoidance of adverse effects is to be achieved i.e. what activities are to managed, how and what matters are relevant to the identification and avoidance of adverse effects.</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Support	Retain.	The identification of amenity landscapes is supported. In the absence of mapping comprehensive and clear criteria are required. These are set out in Schedule 4.
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Amend Policy 2.2.6 to: <ul style="list-style-type: none"> <li>• Comprise of objectives and policies.</li> <li>• Require avoidance of significant adverse effects of the values contributing to the identification of amenity landscapes, and to avoid, remedy or mitigate all other effects <u>on those values</u>.</li> <li>• Include addition policies identifying what activities (i.e. subdivision, use and development) need to be managed, and how in order to avoid significant adverse effects.</li> </ul> See examples in Annexure 2-B of the EDS submission.	<ul style="list-style-type: none"> <li>• The intent of the policy is supported.</li> <li>• Structurally the policy's chapeau reads more like an objective, and the following clauses as individual policies.</li> <li>• Avoidance of significant adverse effects on amenity landscapes is supported (section 7 RMA, Policy 15 RMA).</li> <li>• The reference to "other values" in clause (b) is unclear. As currently worded the policy appears to allow all effects other than significant effects on the values which contribute to the amenity value of the landscape.</li> <li>• The inclusion of criteria to assess the significance of effects is supported in principle. However this depends on the quality of the criteria.</li> <li>• The policy fails to identify the need to avoid cumulative adverse effects.</li> </ul>
49	Highly valued natural resources - the coastal environment	Policy 2.2.7 - Identifying the landward extent of the coastal environment	Amend	<ul style="list-style-type: none"> <li>• Amend the identification criteria to respond to the concerns raised [see reasons].</li> <li>• Move the criteria to a schedule to achieve consistency in structure.</li> </ul>	<ul style="list-style-type: none"> <li>• The identification of the coastal environment is supported and is consistent with Policy 1 NZCPS.</li> <li>• This identification should not be strictly limited to the landward extent of the coastal environment. The coastal environment also includes, for example, islands and intertidal areas.</li> <li>• Clause (a): The presence of coastal vegetation is an important determinant in identifying the coastal environment whether or not it is dominant.</li> <li>• It is not clear why the identification criteria have been identified in the policy as opposed to a schedule.</li> </ul>
50	Highly valued natural resources - the coastal environment	Policy 2.2.8 - Identifying areas of high and outstanding natural character in the coastal environment	Amend	<ul style="list-style-type: none"> <li>• Retain.</li> <li>• Include a methodology for the criteria.</li> <li>• Move the criteria to a schedule for consistency in structure.</li> </ul>	The identification of high and outstanding natural character areas is supported. This is consistent with section 6(a) RMA and Policy 13(1) NZCPS.
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	<ul style="list-style-type: none"> <li>• Amend clause (d) by deleting the phrase "on other values".</li> <li>• Clarify the purpose of clause (e).</li> </ul>	<ul style="list-style-type: none"> <li>• This policy is supported in general.</li> <li>• Clauses (a) and (b) are consistent with section 6(a) RMA and Policy 13 NZCPS.</li> <li>• Clause (c) is supported in principle. This is dependent on the</li> </ul>

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					<p>appropriateness of the criteria provided.</p> <ul style="list-style-type: none"> <li>• Reference in clause (d) to other values is unclear.</li> <li>• Not clear why the contribution of introduced species is expressly addressed in clause (e).</li> </ul>
52	Highly valued natural resources - the coastal environment	Policy 2.2.10 - Identifying surf breaks of national importance	Amend	Map the spatial extent of the critical natural process area of the identified surf breaks. Or, provide criteria for the identification of the ambit of the natural process area of the surf break in an additional schedule.	<ul style="list-style-type: none"> <li>• Supported in principle.</li> <li>• It is important to identify the breaks not only by name but by spatial extent.</li> <li>• Policy 2.2.11 RPS and Policy 16 NZCPS require avoidance of adverse effects on the natural and physical processes contributing to the breaks existence. Many of the natural formations and processes contributing to surf breaks occur under the water, and often at relatively significant distances from the visible break itself.</li> </ul>
53	Highly valued natural resources - the coastal environment	Policy 2.2.11 - Managing surf breaks of national importance	Amend	Map the spatial extent of the critical natural process area of the identified surf breaks. Or, provide criteria for the identification of the ambit of the natural process area of the surf break in an additional schedule.	<ul style="list-style-type: none"> <li>• Supported in principle.</li> <li>• It is important to identify the breaks not only by name but by spatial extent.</li> <li>• Policy 2.2.11 RPS and Policy 16 NZCPS require avoidance of adverse effects on the natural and physical processes contributing to the breaks existence. Many of the natural formations and processes contributing to surf breaks occur under the water, and often at relatively significant distances from the visible break itself.</li> </ul>
54	Highly valued natural resources - outstanding water bodies	Policy 2.2.12 - Identifying outstanding water bodies and wetlands	Amend	<p>Amend Policy 2.2.12 as follows:</p> <ul style="list-style-type: none"> <li>• Provide for the identification of the "significant values" of wetlands.</li> <li>• Amend the criteria to clarify and expand the specific "values" relevant under each sub clause to provide greater direction. Two different sets of criteria are required, one for identifying significant values, and one for identifying the outstandingness of waterbodies. As with the other identification in the RPS it may be most appropriate to include these criteria within a schedule to the RPS. (For example, see Policy 8.2 of the Waikato Regional Policy Statement)</li> <li>• Amend to specify that the Regional Council will identify outstanding freshwater bodies, and significant values of wetlands.</li> </ul>	<ul style="list-style-type: none"> <li>• The identification of outstanding freshwater bodies is supported. In order for these to be protected (Objective A2(a) and B4 NPSFM) they must be identified.</li> <li>• The protection afforded to wetlands under the NPSFM is not focused on outstanding wetlands, but on the significant values of all wetlands. This distinction must be recognized in the RPS.</li> <li>• The identification criteria are extremely broad and highly subjective. They are premised on the "significance" of the listed considerations but provide no direction as to how to determine when those values have reached the significant threshold.</li> <li>• The RPS does not who will undertake the identification procedure.</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	<p>Amend the RPS to:</p> <ul style="list-style-type: none"> <li>• Include specific freshwater objectives, including objectives relating to freshwater bodies and wetlands.</li> <li>• Require avoidance of permanent loss of significant values of wetlands and outstanding fresh water bodies.</li> <li>• Require the avoidance of all adverse effects on these areas.</li> <li>• Identify what activities the effects of which need to be avoided.</li> <li>• Require enhancement of freshwater bodies and wetlands.</li> </ul>	<ul style="list-style-type: none"> <li>• Managing outstanding water bodies and wetlands is critical to ensuring they are protected and preserved.</li> <li>• The chapeau to Policy 2.2.13 specifies a goal as opposed to a course of action. It is more appropriately classified as an objective.</li> <li>• The requirement in clause (a) to avoid significant adverse effects is inadequate. All adverse effects should be avoided in these areas.</li> <li>• The focus on outstanding wetland is incorrect. The "significant values" of all wetlands are to be protected.</li> <li>• The policy fails to identify the activities, the effects of which need to be avoided.</li> <li>• The identification of criteria for assessing the significance of adverse effects can be useful depending on the quality of the criteria.</li> <li>• The enhancement of freshwater bodies and wetlands should be required, not encouraged (s7(f), s30(1)(c)(ii) and (iv) RMA).</li> </ul>
62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Amend	<p>Amend Policy 2.3.3 as follows:</p> <ul style="list-style-type: none"> <li>• Identify how the physical characteristics of freshwater bodies in (b) relate to and are used to achieve integrated management.</li> <li>• Identify specific actions necessary to achieve</li> </ul>	<ul style="list-style-type: none"> <li>• Policy 2.3.3 is more of an objective than a policy and fails to clearly identify how an integrated approach to managing freshwater catchments is to be achieved.</li> <li>• The use of consistent freshwater objectives between interconnected waterbodies is supported, however the RPS contains no provisions</li> </ul>

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				integrated management between catchments.	providing for the process of developing these objectives. <ul style="list-style-type: none"> <li>The requirement to recognise morphology etc. is non-directive. It provides no guidance as to how these natural factors contribute to integrated management.</li> <li>The maintenance and enhancement of freshwater values etc. identified in (c) is generally supported, however these are the underlying goals integrated management should achieve. The policy should identify what specific actions need to be taken to achieve integrated management.</li> </ul>
63	Natural systems and interdependencies	Policy 2.3.4 - Applying an integrated management approach for the coastal environment	Amend	Amend to include a suit of policies to achieve integrated management in the coastal environment and give effect to the NZCPS.	The policy is supported in principle. However, it is extremely broad and provides little guidance as to what integrated management means, how it is to be achieved, or on the application of environmental bottom lines.
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	Include additional policies addressing / providing a course of action for specific freshwater issues other than reduction of catchment yield.	<ul style="list-style-type: none"> <li>Land use management for achieving freshwater outcomes should not be limited to dry catchments. Additional specific policies are required to address other key freshwater issues such as sediment runoff.</li> <li>Specific freshwater issues are discussed in the submission.</li> </ul>
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Amend	Amend Policy 4.3.2 as follows: <ul style="list-style-type: none"> <li>Amend the chapeau to require avoidance of permanent reduction in water yield.</li> <li>Identify other activities requiring management in dry catchments and specifying how they are to be managed.</li> </ul>	<ul style="list-style-type: none"> <li>The management of dry catchments is strongly supported. This is an important course of action to ensure that freshwater quantity objectives and limits are achieved.</li> <li>Policy 4.3.2 requires avoidance of significant reduction in water yield. Section 30(1)(a)(iii) RM requires water quantity be maintained. Avoidance of permanent reduction in water yield is more appropriate.</li> <li>Currently the management tools available are restricted to the activities identified in clauses (a) and (b). There are other activities, such as farming and horticulture, the management of which is critical in dry catchments.</li> </ul>
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	Amend Policy 4.4.1 to specify that the courses of action identified as necessary to achieve efficient allocation must occur within identified allocation limits, and must give effect to environmental bottom lines.	<ul style="list-style-type: none"> <li>The efficient allocation and use of water is supported (Objective B4 NPSMF).</li> <li>However, the RPS fails to identify that the use and allocation of water must occur within allocation limits, set to give effect to environmental bottom lines (Policy B2 NPSFM).</li> </ul>
165	Making the most of available resources	Policy 4.4.3 - Encouraging environmental enhancement	Amend	Clarify that enhancement is encouraged when the base level water quality is within the allocated limit and required when in over-allocated areas.	<ul style="list-style-type: none"> <li>Enhancement of the natural environment is supported. However, in many of the listed activities encouraging enhancement or improvement is insufficient.</li> <li>Enhancement should only be encouraged in areas where maintenance of water quality etc. is acceptable (i.e. in areas where water quality and ecosystem health are good).</li> </ul>
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Amend	Amend as follows: <ul style="list-style-type: none"> <li>Provide for the control of animal waste discharges in order to effect to freshwater objectives and within allocation limits.</li> <li>Include specific policies or methods relating to the control of point source discharges, non-point source discharges and riparian planting.</li> </ul>	<ul style="list-style-type: none"> <li>The avoidance of objectionable discharges is strongly supported in principle.</li> <li>Discharges of animal waste are inevitable. The focus should be on controlling discharges in order to give effect to freshwater objectives and within allocation limits.</li> <li>The focus of controlling discharges should be on the life-supporting capacities of freshwater bodies, preventing degradation of water quality and avoidance of over-allocation (Objectives A1 and A2 NPSFM).</li> <li>The policy fails to address both point source and non-point source discharges. Both of which compromise water quality and which require different management techniques.</li> <li>The policy could potentially be better utilized as a specific method, supporting a policy focused on management of adverse effects of activities.</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting	Amend	<ul style="list-style-type: none"> <li>Delete clause (a).</li> </ul>	<ul style="list-style-type: none"> <li>The enablement of biodiversity offsetting is supported.</li> </ul>

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		of indigenous biodiversity		<ul style="list-style-type: none"> <li>Amend to specify that in some locations avoidance of adverse effects is required. It is not appropriate to provide for remediation, mitigation or offsetting in those locations.</li> <li>Amend to specify when offsetting is required. For example, subdivision, use and development which [affects] indigenous biodiversity.</li> </ul>	<ul style="list-style-type: none"> <li>The intent of clause (a) is not clear: it appears to limit the use of offsetting to situations where the activities causing adverse effects have a functional need to locate in significant or outstanding areas.</li> <li>This ignores environmental bottom lines and the requirement that adverse effects in those areas are avoided.</li> <li>It is not clear what limiting the use of off-setting to activities with a functional need to be in a certain place means. The RPS should specify when offsetting is required.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Add additional criteria to encapsulate all best practice offsetting principles. (See annexure 2-D of submission).	<ul style="list-style-type: none"> <li>Clause (a) and the requirement to achieve no net loss and preferably a net gain is supported. No net loss should be defined.</li> <li>Offsetting must be applied carefully as it is utilised to justify losses. Measures should only be considered offsetting if they comply with best practise principles.</li> <li>The parameters in clause (b)-(d) are relevant but they do not encapsulate the best practise offsetting principles.</li> </ul>
249	Glossaries	Glossary	Amend	Define biodiversity offset (this definition is from the proposed NPS for indigenous biodiversity): <u>"Measureable conservation outcomes resulting from actions which are designed to compensate for more than minor residual adverse effects on biodiversity, where those effects arise from an activity after appropriate prevention and mitigation measures have been taken. The goal of biodiversity offsets is to achieve no net loss and preferably a net gain of biodiversity on the ground with respect to species composition, habitat structure and ecosystem functions."</u>	No reason given.
249	Glossaries	Glossary	Amend	Define no net loss (this definition is based on the NZ Government Good Practice Guidance on Biodiversity Offsetting): <u>"The goal of biodiversity offsetting is to achieve no net loss and preferably a net gain of biodiversity on the ground with respect to:</u> <ul style="list-style-type: none"> <li><u>Species abundance, population structure and composition (e.g. individual species or species groups)</u></li> <li><u>Habitat structure (e.g. vegetation tiers, vegetation patterns)</u></li> <li><u>Ecosystem functions (e.g. nutrient cycling rates)</u></li> <li><u>People's use of and cultural values associated with biodiversity</u></li> </ul> <u>No net loss in essence refers to the point at which biodiversity gains from targeted biodiversity management activities match the losses of biodiversity due to the impacts of a specific development project, so that there is no net reduction in the type, amount and condition (quality) of biodiversity. A net gain means that biodiversity gains exceed a specific set of losses associated with development."</u>	No reason given.
253	Other comments	Structure of the document & useability - general	Amend	<ul style="list-style-type: none"> <li>Restructure the PRPS into chapters each focusing on a key resource topic; freshwater, coastal environment, natural features and landscapes, biodiversity, air quality etc.</li> <li>Structure each chapter to logically progress</li> </ul>	<ul style="list-style-type: none"> <li>In its final form the PRPS will be "the heart of resource management" in the Otago region. As such, it is critical that it is well structured and easy to follow.</li> <li>The PRPS fails to identify significant resource management issues for the Otago region. The identification of the region's significant</li> </ul>

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				<p>from issues to objectives to policies to methods, and to include explanations for the provisions.</p> <ul style="list-style-type: none"> <li>• Include catchment specific sub-chapters where necessary. These should include subtitles which match with the key resource topic titles to ensure clarity and consistency.</li> <li>• Include summary tables in each chapter[, to] display the issues for the topic, the objectives relating to each issue, the policies relating to the objective, and the methods for implementing each policy.</li> </ul>	<p>resource and environmental issues is critical as they drive the subsequent objectives, policies and methods.</p> <ul style="list-style-type: none"> <li>• Key resources are addressed at random. Different elements of identification and management of a singular resource fall under different "key outcomes": it is extremely difficult to pinpoint all the relevant provisions to a specific resource, and to identify how that resource is to be controlled and managed.</li> <li>• Objectives should clearly express what is to be achieved, where, when and by whom; indicate clear, realistic and measurable environmental bottom lines; and address decisions upfront and decisively. The RPS objectives do not meet these standards. As a whole the objectives are extremely broad, and conflate numerous resources and environmental issues in a single objective.</li> <li>• Policies should describe a "course of action" to achieve the objective, and be clear, specific and at times highly directive. Many of the RPS's policies do not meet these standards. Many policies would be better classified as objectives, stating what is to be achieved rather than how it is to be achieved. Others do little more than paraphrase the requirements of higher order documents rather than interpret them into the regional or local context.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	<p>Seeks:</p> <ul style="list-style-type: none"> <li>• Any alternative relief / wording which respond to the issues raised.</li> <li>• Such other relief as is considered necessary to address the concerns set out in this submission.</li> </ul>	No reason given.

### 128 Z Energy Limited, BP Oil NZ Limited and Mobil Oil NZ Limited

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64	Natural systems and interdependencies	Policy 2.3.5 - Applying an integrated management approach for airsheds	Amend	<p>Amend Policy 2.3.5 to address potential reverse sensitivity effects associated with the establishment or intensification of activities in proximity to established activities. This could be achieved by adding the following clause: "<u>b) iii. Restrict to the extent appropriate, the establishment or intensification of activities that may result in reverse sensitivity effects on established activities.</u>"</p>	<p>The intent of this policy is supported but it is considered important that the policy have regard to minimising potential for reverse sensitivity effects.</p>
65	Chapter B3 - Resilience, health and safety	Chapter B3 - general requests	Amend	<p>Ensure the objective and policies addressing natural hazards are simplified to provide clear and concise direction that is appropriate for an RPS level document and which focuses on the management of land use so the consequences of natural hazard risk are acceptable. Avoid unintended perverse outcomes from the focus on avoidance and reduction of natural hazard risk.</p>	<ul style="list-style-type: none"> <li>• Natural hazards are addressed through one objective and some 11 policies. This framework should be simplified significantly to provide the clear and concise direction that is appropriate for an RPS.</li> <li>• The policies should focus on managing the risk of natural hazards to people, property and infrastructure.</li> <li>• Activities should not be unreasonably constrained by a requirement to avoid or reduce natural hazard risk.</li> </ul>
65	Chapter B3 - Resilience, health and safety	Chapter B3 - general requests	Amend	<p>Include a separate objective for contaminated land as follows: "<u>Land contamination is identified and managed to protect human health and the environment and ensure this land is fit for purpose.</u>"</p>	<p>The policies under Objective 3.9 suggest that contaminated land is also subject to this objective although it is not specifically mentioned in the objective or explanatory text. Contaminated land is the result of an historic discharge or incident. The discharge has occurred and the effects are in existence. Hazardous substances provision are about ensuring management of those substances to ensure control is not lost. Contaminated land should be subject to separate objectives and policies.</p>



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76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Support	Retain Objective 3.1 without modification.	Objective 3.1 is supported.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend [d) and e)] as follows: "d) Exposure of the activity to natural and technological hazard risks, <u>having regard to mitigation proposed;</u> and e) The functional <u>necessity need</u> for the activity to be located..."	<ul style="list-style-type: none"> <li>The Oil Companies support the recognition of natural and physical environmental constraints provided at Policy 3.1.1.</li> <li>d) should explicitly recognise the role of mitigation in limiting exposure of activities to hazard risks.</li> <li>While an activity may not have an essential requirement to be located in a particular location there may be a strong "functional need" for a chosen location.</li> </ul>
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Support	Retain Objective 3.2 without modification.	It is not possible to control the risk of natural hazards per se. In the context of risks posed to Otago's communities, the focus on risk and minimisation is appropriate.
80	Natural hazard risk	Policy suite 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Ensure Policies 3.2.1 to 3.2.3 clearly and concisely require identification of natural hazard risk (rather than likelihood and consequence) and avoid unnecessary duplication across these policies.	<ul style="list-style-type: none"> <li>Significant duplication between these policies in the assessment required.</li> <li>Addressing likelihood and consequence separately is not appropriate. The important policy consideration is how likelihood and consequence come together to generate risk and in turn how this risk can be managed and assessed.</li> </ul>
80	Natural hazard risk	Policy suite 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Amend Policies 3.2.4 and 3.2.5 to: <ul style="list-style-type: none"> <li>Avoid duplication with policies identifying risk</li> <li>Ensure focus is on management of risk and acceptable levels of risk, and</li> <li>Address how the consequences of natural hazards may be managed and assessed having regard to particular activities.</li> </ul>	<ul style="list-style-type: none"> <li>Often very little that can be done to influence the occurrence of a natural hazard event. The focus should therefore be on management to ensure the risk of the hazard to people, property and infrastructure is acceptable. The level of acceptability may differ significantly depending on the risk.</li> <li>The concept of residual risk is problematic and does not recognise that a degree of risk will often be appropriate. These policies should guide management and assessment for risk and should not repeat matters addressed in 3.2.1-3.2.3.</li> </ul>
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Ensure that Policy 3.2.6 is amended to recognise that it is not necessary or possible to avoid all natural hazard risk or increases in risk, especially where there is no control over the frequency of events. Ensure the focus is on the adverse effects arising from an exposure to a hazard and not about controlling the hazard per se.	<ul style="list-style-type: none"> <li>Do not support blanket avoidance and reduction approaches to natural hazard risk as taken in 3.2.6 and 3.2.7: in the majority of circumstances it will be appropriate for risk to be appropriately managed rather than avoided entirely.</li> <li>It is considered that these management policies could be appropriately consolidated into something similar to the objective contained in the decision on the Strategic Directions and Outcomes to the Christchurch Replacement District Plan.</li> </ul>
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend Policy 3.2.7 to recognise that it is not appropriate to reduce risk and that the focus should be on minimisation. This could be achieved by adopting wording along the following as follows: "a) New subdivision, use and development, <u>shall:</u> <u>i. be avoided in areas where the risks of natural hazards to people, property and infrastructure are assessed as being unacceptable;</u> and <u>ii. otherwise be undertaken in a manner that ensures the risks of natural hazards to people, property and infrastructure are appropriately mitigated;</u> b) <u>Except that new infrastructure may be located in areas where the risks of natural hazards to people, property and other infrastructure are assessed as being</u>	<ul style="list-style-type: none"> <li>Do not support blanket avoidance and reduction approaches to natural hazard risk as taken in 3.2.6 and 3.2.7: In the majority of circumstances it will be appropriate for risk to be appropriately managed rather than avoided entirely.</li> <li>The concept of "reducing" risk for existing natural hazards is problematic, e.g. there may be little one can do to mitigate the effect at the Port from tsunami if the port is going to continue to be able to service shipping at sea level. It is important to ensure that there is flexibility in the policy to avoid unintended consequences for existing and new development in the region.</li> <li>It is considered that these management policies could be appropriately consolidated into something similar to the objective contained in the decision on the Strategic Directions and Outcomes to the Christchurch Replacement District Plan.</li> </ul>

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				<u>unacceptable, provided that:</u> <u>i. there is no reasonable alternative; and</u> <u>ii. the strategic infrastructure has been designed to maintain, as far as practicable, its integrity and form during natural hazard events.</u> <u>iii. The natural hazard risks to people, property and infrastructure are appropriately mitigated."</u>	
88	Natural hazard risk	Policy 3.2.8 - Applying a precautionary approach	Support	Retain Policy 3.2.8 without modification.	The Oil Companies support the precautionary approach to natural hazard risk.
89	Natural hazard risk	Policy 3.2.9 - Protecting features and systems that provide hazard mitigation	Amend	Amend Policy 3.2.9 as follows: "Protecting features and systems that provide hazard mitigation. <del>Protect, restore, enhance and promote the use of</del> <u>Avoid, remedy or mitigate adverse effects on existing natural or modified..."</u>	<ul style="list-style-type: none"> <li>The title of this policy is misleading. Council should clarify the purpose of this policy and amend it accordingly.</li> <li>A focus on avoiding, remedying or mitigating effects on existing features would seem most appropriate, especially in light of Policy 3.2.10 which seems to discourage engineering interventions.</li> </ul>
90	Natural hazard risk	Policy 3.2.10 - Mitigating natural hazards	Oppose	Delete Policies 3.2.10 and 3.2.11 or otherwise provide justification as to why preference should be given to non engineering interventions to natural hazards.	<ul style="list-style-type: none"> <li>While the phrase "hard mitigation measures" is not defined it seems that these policies may have been drafted with flood and coastal erosion in mind.</li> <li>They are likely to have unintended consequences for other mitigation measures that are widely employed across the region (e.g. a stormwater retention tank).</li> </ul>
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Oppose	Delete Policies 3.2.10 and 3.2.11 or otherwise provide justification as to why preference should be given to non engineering interventions to natural hazards.	<ul style="list-style-type: none"> <li>While the phrase "hard mitigation measures" is not defined it seems that these policies may have been drafted with flood and coastal erosion in mind.</li> <li>They are likely to have unintended consequences for other mitigation measures that are widely employed across the region (e.g. a stormwater retention tank).</li> </ul>
96	Objectives on resilience, health and safety	Objective 3.4 - Good quality infrastructure and services meet community needs	Support	Retain Objective 3.4 without modification	<ul style="list-style-type: none"> <li>Infrastructure is critical to the functioning of the region and the operations of the Oil Companies.</li> <li>The continued resilience of the fuel supply chain is of particular importance to the Oil Companies.</li> </ul>
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: .... b) Designing infrastructure to take into account (as appropriate): ..."	The present list will not necessarily apply or need to be assessed for all infrastructure.
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Support	Retain Policy 3.4.2 without modification.	This policy is supported.
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Support	Maintain Policy 3.4.3 without modification.	This policy is supported.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Support	Retain Policy 3.4.4 without modification.	This policy is supported.
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Support	Retain Objective 3.5 without modification.	The objective is supported.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Add: " <u>g) Bulk storage for wholesale or distribution purposes of natural or manufactured gas over 15 tonnes, or petroleum over 1 million litres;</u> "	The recognition of ports and airports as nationally or regionally significant infrastructure is supported. The policy should be amended to specifically refer to bulk fuel supplies.
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend [c) and d)] as follows: "c) Avoiding, remedying or mitigating other adverse effects on values <u>that contribute to the</u>	Amendments are to clarify the values referred to are those that contribute to the significant or outstanding nature of those areas.

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				significant or outstanding nature of those areas identified in a); and d) Assessing the significance of adverse effects on these values of those areas identified in a), as detailed in Schedule 3; and ..."	
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	Amend [a] as follows: "a) Restricting the establishment <u>or intensification</u> of these activities that may result in reverse sensitivity effects <u>or other operational constraints</u> ; and".	<ul style="list-style-type: none"> <li>• Issues around risk management and encroaching sensitive land uses are becoming a greater focus for planning authorities and Worksafe New Zealand Ltd.</li> <li>• To ensure that infrastructure such as the bulk storage terminals at the port and the airport are provided for it will be increasingly important to ensure sensitive land uses do not encroach around such facilities. This is particularly relevant in Dunedin, should there be a drive for any redevelopment in and around the Port of Otago.</li> <li>• Intensification of activities that may have such effects as increased populations associated with sensitive activities should also be restricted.</li> </ul>
114	Energy	Policy 3.6.6 - Reducing long term demand for fossil fuels	Amend	Amend Policy 3.6.6 as follows: "Reduce the long term demand for fossil fuels from Otago's communities, <u>while recognising the importance and maintaining the integrity of the existing fossil fuel supply chain to the region in the interim</u> , by: ... d) <u>Ensuring fossil fuel supply chain infrastructure can be maintained and enhanced in the interim to meet community fuel demands, including facilities for the transition to a lower carbon future.</u> "	<ul style="list-style-type: none"> <li>• This policy is supported but should recognise the importance of maintaining the integrity of the existing fossil fuel supply chain.</li> <li>• There will be a need to rely primarily on fossil fuels until a shift to more sustainable fuels can be achieved. This transition will take some time to occur and in the interim it is important the supply chain for fossil fuels is maintained.</li> <li>• The support for the uptake of new technologies for more efficient energy uses, or renewable or lower emission transport fuels, is welcomed. The Oil Companies are involved in the development of biofuels and the reduction in diesel emissions through the increasing availability of diesel exhaust fluids.</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	Retain Policy 3.7.1 but delete c): " <del>e) Reduce risk from natural hazards, including by avoiding areas of significant risk; and</del> "	<ul style="list-style-type: none"> <li>• Such approaches should not become mandatory in all circumstances.</li> <li>• The phrase "low impact design techniques" (LID) is usually associated with the management of stormwater along with other approaches such as water sensitive design.</li> <li>• Matter (c) relating to natural hazards addresses matters that should be addressed through section 3.2 and need not be reiterated here.</li> <li>• Matter (f)(i) of Policy 3.7.1 is welcomed and should be maintained as it recognises that urban areas require a range of housing, commercial, industrial and service activities. Service stations are an essential service and should have scope to locate in urban areas.</li> </ul>
119	Urban design	Policy 3.7.2 - Encouraging use of low impact design techniques	Amend	Retain Policy 3.7.2 with the following modification: "a) Reduce potential adverse environmental effects, <del>including on stormwater and air quality</del> ; or ... e) <del>Enhance amenity; or ...</del> "	<ul style="list-style-type: none"> <li>• Such approaches should not become mandatory in all circumstances.</li> <li>• The phrase "low impact design techniques" (LID) is usually associated with the management of stormwater along with other approaches such as water sensitive design.</li> <li>• Policy 3.7.2 sets out four matters to which LID is to be encouraged to apply. Matter (c) relates to "enhance amenity". The Oil Companies would not want LID to be required just for the purposes of amenity and this matter should be deleted.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Amend as follows: "... c) iv. <del>Avoid land with significant risk from natural hazards; and ensuring the risk from natural hazards is acceptable for the proposed development</del> ... h) Giving effect to the principles of crime	<ul style="list-style-type: none"> <li>• The Oil Companies support the principle of this policy but consider it should be amended to address the potential for urban growth to generate reverse sensitivity issues.</li> <li>• Natural hazards need not be addressed through policies in this chapter and can be appropriately provided for in the natural hazards section.</li> <li>• If reference is to be included then there should not be a complete avoidance approach.</li> </ul>

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				prevention through environmental design ; <u>and</u> i) <u>Restricting the establishment or intensification of activities that may result in reverse sensitivity effects; and.</u> "	
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Amend as follows: "Hazardous substances and <del>waste materials</del> do not harm human health or the quality of the environment in Otago."	<ul style="list-style-type: none"> <li>• Hazardous substances are essential to a modern way of life. Their importance needs to be recognised and the need for their bulk storage, transport and use recognised. Waste on the other hand is something which is undesirable and to be discarded.</li> <li>• It would be appropriate to address these matters separately. This confusion is made more acute by the references to hazardous substances and hazardous waste.</li> </ul>
129	Hazardous substances and waste	Policy suite 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Delete reference to waste from the hazardous substance provisions. Ensure hazardous substances are appropriately addressed under Objective 3.9 and waste management is addressed through its own separate suite of objectives and policies.	<ul style="list-style-type: none"> <li>• Hazardous substances are essential to a modern way of life. Their importance needs to be recognised and the need for their bulk storage, transport and use recognised. Waste on the other hand is something which is undesirable and to be discarded.</li> <li>• It would be appropriate to address these matters separately. This confusion is made more acute by the references to hazardous substances and hazardous waste.</li> <li>• The corresponding policies suggest that contaminated land is also subject to this objective although it is not specifically mentioned in the objective or explanatory text. Contaminated land is the result of an historic discharge or incident. The discharge has occurred and the effects are in existence. Hazardous substances provision are about ensuring management of those substances to ensure control is not lost. Contaminated land should be subject to separate objectives and policies.</li> </ul>
130	Hazardous substances and waste	Policy 3.9.1 - Integrating management of hazardous substances and waste	Oppose	Delete Policy 3.9.1.	An integrated approach to the management of hazardous substances and waste is supported in some instances but for the purposes of the RPS it is unclear. Hazardous substances and waste are governed under separate legislation and the issue of trying to combine them is borne out in the balance of policies. Should they be retained they need to be more generic.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend Policy 3.9.2 as follows" "Managing the use <u>and</u> storage <del>and disposal</del> of hazardous substances <del>, and the storage and disposal of waste materials.</del> Manage the use <u>and</u> storage <del>and disposal</del> of hazardous substances, <del>and the storage and disposal of waste materials;</del> <u>having regard to the sensitivity of the receiving environment and recognising the social and economic benefits such activities provide, to avoid accidental spillage or release of those substances and materials;</u> by: a) Providing secure containment of those substances in case of accidental spillage; and b) Minimising risk associated with <u>Requiring that hazardous facilities are, to the extent practicable, resilient to potential damage caused by natural hazard events that will result in unintended discharges;</u> and c) <u>Managing the level of risk so as to appropriately manage potential</u> Avoiding adverse effects of <del>these hazardous</del> substances and materials on <u>property, the health of and safety of the people, and on other values the</u>	The difficulties of combining policies relating to hazardous substances and waste are apparent in Policy 3.9.2. For instance matter (a) could be interpreted as requiring secure containment of waste in a landfill which is unlikely to be provided. The policy should be amended to address only the use and storage of hazardous substances and additional policies developed to address waste (hazardous and otherwise).

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				<p><del>potential for contamination of air, land and water; and</del>  <del>d) Providing for the development of facilities to safely store, transfer, process, handle and dispose of hazardous waste and waste materials; and</del>  <del>e) Ensuring hazardous substances are treated or disposed at authorised facilities, in accordance with the relevant disposal instructions; and</del>  <del>f) Restricting the location or intensification of activities that may result in reverse sensitivity effects near:</del>  <del>i. Authorised facilities for hazardous substance use and storage treatment or disposal; or</del>  <del>ii. Waste transfer or disposal facilities."</del></p>	
132	Hazardous substances and waste	Policy 3.9.3 - Identifying contaminated land	Support	Retain Policy 3.9.3 without modification.	Notwithstanding that the contaminated land policies should be separated from those relating to hazardous substances, the intent of a policy to identify contaminated land is supported and should be retained without modification.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	<p>Amend Policy 3.9.4 as follows:  <u>"Encourage investment in and management of the use of contaminated land, to protect ensure it is fit for purpose and that it does not pose an unacceptable level of risk to people and the environment from adverse effects, by:</u>  a) <u>Requiring that Prior to subdivision or development of potentially contaminated land, requiring a site investigation is undertaken to determine the nature or extent of any contamination is characterised where subdivision or land use change is proposed on potentially contaminated land; and</u>  b) <u>Requiring, having regard to the intended use of the site, Where there is contamination:</u>  i. <u>Requiring an assessment of associated environmental risks from any contamination;</u>  and  ii. <u>Remediating land; and</u>  c) Considering the <u>nature and</u> need for ongoing monitoring of contaminant levels and associated risks <u>where the discharge of contaminants is likely to be a risk to human health and the environment."</u></p>	<ul style="list-style-type: none"> <li>• This Policy relates to contaminated land and does not fit under the objective which relates to hazardous substances and waste.</li> <li>• Contaminated land is the result of an historic discharge(s) therefore, absolute protection of the environment is not appropriate or achievable - the effect is already occurring. The focus of the policy should be on ensuring the land is fit for its intended use.</li> <li>• Matter (a) requires a site investigation. It is not clear when this requirement would be triggered, what a site investigation would require, or to what purpose it should be designed. Further, the NES framework for managing potentially contaminated land in such circumstances does not necessarily require a site investigation.</li> <li>• Matter (b)(i) is supported, however it is considered important to have regard to the nature of the intended land use.</li> <li>• Matter (b)(ii) refers to remediating land. A mandatory remediation requirement where contamination is found is not appropriate. There may be many different approaches to addressing the risks arising from contaminated land, for instance monitoring or management. The complete tool box of options should be enabled through the policy.</li> </ul>
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Oppose	Delete Policy 3.9.5.	<ul style="list-style-type: none"> <li>• This policy requires the avoidance of new contaminated land. Contamination occurs where there is a loss of control of a product. Accidents cannot be avoided and contamination will continue to occur from time to time</li> <li>• As drafted this policy effectively sets a zero tolerance threshold and could be construed as preventing the establishment of any activity involving hazardous substances.</li> </ul>
135	Hazardous substances and waste	Policy 3.9.6 - Encouraging use of best management practices for hazardous substance use	Amend	Amend Policy 3.9.6 as follows: "Encourage the use of best management practices to prevent or mitigate adverse effects of the use of hazardous substances on the environment, <del>including reducing their use."</del>	<ul style="list-style-type: none"> <li>• The policy support for use of best management practices is supported.</li> <li>• Seek deletion of the reference to a reduction in use of hazardous substances. This is not reflected in best practice guidance and should not be confused with the waste hierarchy.</li> </ul>

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136	Hazardous substances and waste	Policy 3.9.7 - Encouraging services for hazardous substances collection, recycling and disposal	Amend	Relocate Policy 3.9.7 to a separate section on waste matters.	Addressing hazardous substances and waste materials under one objective is problematic and the Oil Companies consider that it would be appropriate to address these matters separately.
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Support	Retain Policy 4.3.1 without modification.	The recognition of reverse sensitivity at matter (c) and the provision for other activities that have a functional need to locate in rural areas are supported.
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Support	Retain Policy 4.3.4 without modification.	The Oil Companies support a degree of protection for central business districts but seek to ensure that matter (c) retains the reference to "...significant adverse effects on the central business district". Service stations can be reasonably located outside CBDs with no such effects.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Support	Retain Policy 4.3.5 without modification.	This policy provides a degree of protection for industrial development from the encroachment of sensitive activities.
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Amend	Amend Policy 4.5.1 to ensure that the avoidance policy does not have unintended perverse consequences, for instance requiring the avoidance of emissions from vehicles. This could be achieved by amending Policy 4.5.1 as follows: "Avoid discharges that are objectionable or offensive, <del>noxious or dangerous, having regard to the sensitivity of the receiving environment, to takata whenua and the wider community,</del> including: a) Discharges of human or animal waste: i. Directly to water; or ii. In close proximity to water; or iii. In close proximity to mahika kai sites; or b) Discharges of hazardous or noxious substances close to sensitive activities, including: i. Residential activities; or ii. Schools and other educational activities; or iii. Places of public access to the natural environment; or iv. In close proximity to mahika kai sites; or c) <del>Odorous or conspicuous discharges.</del> "	<ul style="list-style-type: none"> <li>The avoidance of discharges that are offensive or objectionable is supported.</li> <li>The criteria for assessing this should be clearly established and measurable.</li> <li>The list of specific inclusions is also problematic as it is unclear whether such discharges should be avoided in all instances or whether only offensive or objectionable discharges should be avoided. Examples of discharges which might meet the inclusions and not be objectionable include discharge of treated wastewater to water, or carbon monoxide emissions from cars.</li> <li>Matter (c) is of concern as it is not appropriate to avoid all discharges that are odorous or conspicuous.</li> <li>Zoning should remain as the primary control for ensuring separation between incompatible activities.</li> </ul>
169	Management of adverse effects	Policy 4.5.2 - Applying an adaptive management approach	Amend	Amend Policy 4.5.2 as follows: "Apply an adaptive management approach, to address <del>potential</del> adverse effects that might arise and that can be <del>avoided, remedied or mitigated before they become irreversible</del> , by: a) Setting appropriate indicators for effective monitoring of <del>potential</del> these adverse effects; and b) Setting thresholds to trigger <del>remedial action to avoid remedy or mitigate adverse effects, before the effects result in irreversible damage.</del> "	The intent of this policy is supported and is relevant to the approach taken by the Oil Companies to water takes and discharges associated with the dewatering of tank pits for the installation of underground petroleum storage tanks. Dewatering water is treated differently depending on levels of contamination encountered. This policy could be better adapted to also fit such applications.
177	Roles and responsibilities	Roles and responsibilities	Amend	Expand on the roles and responsibilities of regional and district authorities, particularly relating to hazardous substances and contaminated land, to clearly distinguish the roles of each and to avoid conflict and/or duplication with other legislation and in particular have regard to the Guidance from	<ul style="list-style-type: none"> <li>It is important that an RPS provides clear guidance in relation to the responsibilities of regional and district authorities, particularly with regard to contaminated land and hazardous substances.</li> <li>There needs to be further guidance in relation to the responsibilities of regional and district council functions relating to contaminated land if the overlap of functions is to be appropriately managed: no method establishes what is required with regard to contamination in City and</li> </ul>

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				<p>MfE on hazardous substances . For example, in relation to the function of city and district councils, this could be achieved with wording along the following lines:  "City and district councils will:  Specify objectives, policies and methods for the control of the use of land for:  a) ...;  b) The prevention or mitigation of the adverse effects of the storage, use, transport or disposal of hazardous substances on the environment outside of the beds of rivers, lakes and wetlands or the coastal marine area, <u>noting that that the inclusion of hazardous substance controls in plans should be the exception rather than the rule and included only when a rigorous s32 analysis shows that these controls are justified</u>;  c)..."</p>	<p>District Plans. City and District Plans should focus on human health and the NES.</p> <ul style="list-style-type: none"> <li>• In terms of hazardous substances there is considerable overlap with HSNO requirements. Authorities should be tasked only with addressing those gaps in the HSNO framework that are properly dealt with under the RMA, and where duplicated frameworks will not result. Having regard to the role and function of other (higher) authorities and the fact that discharges, odour and water quality are dealt with by the regional councils, the logical outcome is to charge district council's with addressing, to the extent practicable, human health effects, to which visual amenity and cultural values could be added. Otherwise, the management of hazardous substances is appropriately dealt with by legislation other than the RMA.</li> <li>• The roles and responsibilities of city and district councils directs them to establish and maintain provisions in plans to control the storage, use, transport or disposal of hazardous substances. This is contrary to current Ministry for the Environment guidance which advises that the inclusion of hazardous substance controls in plans should be the exception rather than the rule and included only when a rigorous analysis shows that these controls are justified.</li> </ul>
249	Glossaries	Glossary	Amend	<p>Reverse sensitivity: Amend the definition of reverse sensitivity by making the following amendments, or amendments to achieve the same intent:  <del>"Arises where an established activity is causing adverse environmental impact to nearby land, and an activity susceptible to those impacts is proposed for that land. The sensitivity is created by the likelihood that if the new use is permitted, the established activity may be required to restrict its operations or mitigate its effects to avoid adversely affecting the new activity. The potential for the operation of an existing lawfully established activity to be constrained or curtailed by the more recent establishment or intensification of other activities which are sensitive to the established activity."</del></p>	<ul style="list-style-type: none"> <li>• Application of the concept of reverse sensitivity in the RPS is supported.</li> <li>• The proposed definition should better define reverse sensitivity as it may well be adopted in lower level documents.</li> <li>• The proposed definition suggests reverse sensitivity effects arise where an activity is currently causing adverse environmental impact to land. This is not necessarily the case. The introduction of a new activity, or indeed the intensification of an existing activity, may however lead to such effects.</li> <li>• The definition should also recognise that intensification of activities can create reverse sensitivity effects and that it need not be specific to new uses.</li> </ul>
249	Glossaries	Glossary	Amend	<p>Essential Services: Clarify that service stations are included in the definition of essential services. This could be achieved by amending the definition of essential services as follows:  "Include... for civil defence purposes, <u>including service stations.</u>"</p>	<p>Continuity of operations at service stations is recognised in the National Civil Defence Emergency Management Fuel Plan (2012) as paramount to the supply of fuel to emergency services and vehicles of other response agencies, as well as to the public.</p>
249	Glossaries	Glossary	Amend	<p>Infrastructure: Amend to include bulk storage facilities. This could be achieved by replacing the proposed definition by the following, or amendments to achieve the same intent:  <u>"Infrastructure has the same meaning as in section 2 RMA and also means:</u>  <u>a) Bulk storage for wholesale or distribution purposes of natural or manufactured gas over 15 tonnes, or petroleum over 1 million litres;</u>  <u>b) Storage and treatment facilities for a water supply distribution system</u>  <u>c) Storage, treatment and discharge facilities for</u></p>	<p>The proposed definition is taken from the RMA. This is problematic in that it does not specifically provide for bulk fuel storage. This matter has been advanced through the Proposed Auckland Unitary Plan process and the Hearings Panel has released interim guidance on this topic. The Panel considers that infrastructure should be defined by using the RMA definition of that term, supplemented to include some related facilities and suggests the definition submitted.</p>

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				<u>a drainage of sewerage system</u> <u>d) Class 1 solid waste landfills;</u> <u>e) National defence facilities;</u> <u>f) Facilities for air quality and meteorological services."</u>	
249	Glossaries	Glossary	Amend	Regionally significant infrastructure: Include an appropriate definition of regionally significant infrastructure, and explicitly include bulk fuel storage within the definition.	It is noted that the term regionally significant infrastructure is used but not defined in the proposed RPS. Canterbury's RPS provides a definition that could be amended for this purpose.
249	Glossaries	Glossary	Amend	Natural Hazard: Clarify the omissions from the RMA definition or amend the definition of natural hazard as follows: "Includes any atmospheric or earth or water related occurrence (including earthquake, tsunami, erosion, volcanic and geothermal activity, landslip, subsidence, sedimentation, <u>wind</u> , drought, <u>fire</u> or flooding) the action of which adversely affects or may adversely affect human life, property, or other aspects of the environment."	This definition is not the same as that used in the RMA. No explanation is provided as to why fire and wind hazards have been excluded.
249	Glossaries	Glossary	Amend	Residual risk: Delete.	Residual risk is not the key matter; the acceptability of risk should be the focus. Of particular concern is the potential for the concept of residual risk to be adopted in lower order plans and in particular policies that seek to avoid residual risk.
249	Glossaries	Glossary	Support	Retain the definition of "risk" without modification.	The recognition of the relationship between likelihood and consequences is appropriate and is addressed further with regard to the natural hazard objectives and policies.
249	Glossaries	Glossary	Support	Retain the definition of "hazardous substances" without modification.	No reason given.
249	Glossaries	Glossary	Support	Retain the definition of "lifeline utilities" without modification.	Adoption of the definition set out in section 4 of the Civil Defence Emergency Management Act 2002 appropriately provides for the Oil Companies activities at the port.
249	Glossaries	Glossary	Amend	Include a definition of low impact design to the extent it is consistent with and applies to stormwater management.	The phrase "low impact design techniques" (LID) is usually associated with the management of stormwater along with other approaches such as water sensitive design. It is considered that a definition would add clarity over what this is intended to mean, especially in relation to air discharges.
258	Other comments	Consequential amendments & other amendments providing relief	Amend	<ul style="list-style-type: none"> <li>• Make any consequential relief as required to give effect to this submission, including any consequential relief required in any other sections of the Proposed Regional [Statement] that are not specifically subject of this submission but are required to ensure a consistent approach is taken throughout the document; and</li> <li>• Any other relief required to give effect to the issues raised in this submission.</li> </ul>	No reason given.
290	Objectives on resilience, health and safety	Introduction to Objective 3.9	Amend	Amend introduction to Objective 3.9 (p. 70) as follows: <del>"Waste materials are an end product of resource use and must be carefully managed to avoid creating environmental problems.</del> Hazardous substances are <u>potentially</u> dangerous but essential components of some activities. <u>Risks associated with hazardous</u>	<ul style="list-style-type: none"> <li>• Hazardous substances are essential to a modern way of life. Their importance needs to be recognised and the need for their bulk storage, transport and use recognised. Waste on the other hand is something which is undesirable and to be discarded.</li> <li>• It would be appropriate to address these matters separately. This confusion is made more acute by the references to hazardous substances and hazardous waste.</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				substances and their waste should also be <u>appropriately</u> managed to avoid <u>potential adverse effects on</u> creating environmental problems or adversely affecting human health and to minimise potential for contamination of air, land, and water."	
301	Objectives on use and enjoyment of natural and built environment	Introduction to Objective 4.5	Amend	Amend the explanatory text to the Objective 4.5 (p. 87) to ensure it reflects the overarching objective and does not require the avoidance of adverse effects. This could be achieved as follows: "Any use of natural or physical resources has the potential to generate adverse effects. It is important to manage activities to <u>avoid minimise</u> individually or <u>and</u> cumulatively, <u>degrading adverse effects on</u> the quality of Otago's natural environment..."	<ul style="list-style-type: none"> <li>• "Avoid" means to refrain or stop, the objective does not use this term so it is inappropriate for the explanatory text to indicate that is what the intent of the objective is.</li> <li>• In light of the King Salmon decision, the directive nature of the wording may have unintended consequences over time, for instance the inability of activities to secure consent where there are adverse effects.</li> </ul>

### 129 Soho Basin Skifield Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	<ul style="list-style-type: none"> <li>• Retention of all provisions as notified, except as requested in the submission.</li> </ul>	No reason given.
6	Overall approach	Schedule 3 - Significance threshold	Oppose	<ul style="list-style-type: none"> <li>• Delete; or</li> <li>• Amend so it is consistent with case law and insert new criteria to reflect the need to consider offsetting or compensation and to reflect environmental/planning context on a case-by-case basis, e.g.: <ul style="list-style-type: none"> <li>• 11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly offset or otherwise compensated, and consequently reducing the significance of the effect.</li> <li>• 12. Environmental Context: The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</li> <li>• 13. Matters of national importance and national significance: The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA. The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS."</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• The S32 report does not evaluate Schedule 3.</li> <li>• Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant.</li> <li>• Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.</li> </ul>
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Amend	Amend as follows: "The principles of Te Tiriti o Waitangi are <u>identified and</u> taken into account in resource management decisions".	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	Amend as follows: "Policy 1.1.2 <u>Identifying and</u> taking the principles of Te Tiriti o Waitangi into account Ensure that local authorities <u>exercise their functions and powers, to take into account the principles of Te Tiriti o Waitangi identified in</u>	Use wording of RMA Part 2.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>Appendix 1A by:</p> <p>a) <del>Providing</del> <del>Accord</del> Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,</p> <p>b) <del>Involve</del> <del>Involving</del> Kai Tahu in resource management decision-making processes and implementation; and</p> <p>c) <del>Take</del> <del>Taking</del> into account Kai Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taoka; and</p> <p>d) <del>Ensure</del> <del>Ensuring</del> Kai Tahu have the prerogative to:</p> <p>i. <del>Identify</del> <del>Identifying</del> their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and</p> <p>ii. <del>Determine</del> <del>Determining</del> how best to express that relationship; and</p> <p>e) <del>Ensure</del> <del>Ensuring</del> Kai Tahu are able to exercise kaitiakitaka; and</p> <p>f) <del>Ensure</del> <del>Ensuring</del> that district and regional plans:</p> <p>i. <del>Give</del> <del>Giving</del> effect to the Ngai Tahu Claims Settlement Act 1998; and</p> <p>ii. <del>Recognise</del> <del>Recognising</del> and <del>provide</del> <del>providing</del> for statutory acknowledgement areas, as detailed in Schedule 2; and</p> <p>iii. <del>Provide</del> <del>Providing</del> for other areas in Otago that are recognised as significant to Kai Tahu in a manner similar to that prescribed for statutory acknowledgement areas."</p>	
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Objective 1.2 Kai Tahu values, rights and interests and customary resources are <u>identified and</u> sustained."	No reason given.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) Ensuring <u>sustainable management of</u> resources supports <del>their</del> customary uses and cultural values (as detailed in Schedules 1A and B); and"	No reason given.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> on those values and sites <del>, as detailed in Schedule 3;</del> and"	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<ul style="list-style-type: none"> <li>• Amend b) as follows: "b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and"</li> <li>• Delete c).</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Specify or identify "other cultural values" referred to in other parts of the RPS in	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Schedule 1A.	
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	Amend Issue as follows: "Degradation of <u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time <del>will</del> <u>can</u> cause serious damage."	Regional issues include natural resource management issues.
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected <u>from inappropriate subdivision, use and development</u> ."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <del>Natural</del> <u>Environmental</u> systems <u>and resources</u> are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely affects the <u>environmental</u> value of another..."	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's <del>natural and physical</del> resources are recognised, <u>and protected from inappropriate subdivision, use and development</u> <del>maintained and enhanced</del> ."	<ul style="list-style-type: none"> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to: ... c) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... j) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and k) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and l) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ... b) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and ..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				... g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and..."	
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... g) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and h) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend b) as follows: "b)Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those</u> soils, to: ... f) <del>Retain</del> <u>Ensure the primary use of regionally significant soil resources is</u> for primary production <u>purposes</u> ; and g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and ... k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Amend c) iii. as follows: "iii. Historical <del>and heritage</del> associations".	No reason given.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• As applies to all landscape assessments, including for "Special Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					forthcoming district plan reviews.
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Add the following new policy: " <u>Managing cross boundary landscape effects</u> <u>Promote alignment of District Plans and integrated assessments of environmental effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries.</u> "	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries, which would benefit from a regionally integrated approach.</li> <li>This proposed policy would be as effective as the provisions on Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: " <u>Protect and enhance</u> <u>Manage subdivision, use and development that affects</u> , the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects <del>on those values which contribute</del> <u>which will result in</u> to the area or habitat <u>losing its</u> <del>being</del> significant <u>status</u> ; and b) Avoiding significant adverse effects <u>from</u> <u>inappropriate subdivision, use and development</u> on other values of the area or habitat; and <del>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> ..."	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes <del>, using the attributes as detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>These attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>Schedule 4 should be deleted</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: " <u>Protect, enhance and restore</u> <u>Manage subdivision, use and development that affects</u> , the values of outstanding natural features, landscapes and seascapes, by: a) Avoiding adverse effects <del>on those values which contribute to</del> <u>which will result in</u> the <del>loss of the</del> significance of the natural feature, landscape or seascape; and ... <del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> ... <u>q) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values</u> <u>(h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate</u> ".	<ul style="list-style-type: none"> <li>Could disrupt the balance of the values of outstanding natural landscapes and features and other important values.</li> <li>For example, ski fields are appropriate to locate in alpine environments that may be considered outstanding natural landscapes.</li> <li>Ensuring such businesses can continue to operate and provide an important recreational and economic resource to Otago should be borne in mind.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding <del>, using the attributes detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>Concerned about introducing the term of Special Amenity Landscapes.</li> <li>Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of different criteria being used in current or proposed district plans, and hence, creating inefficiencies and potentially slowing down</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					forthcoming district plan reviews. These concerns also relation to Schedule 4. <ul style="list-style-type: none"> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social wellbeing of communities.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Amend as follows: " <del>Protect or enhance the values of</del> <u>Manage</u> special amenity landscapes and highly valued natural features, by: a) <del>Avoiding, remedying or mitigating significant</del> adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and <del>b) Avoiding, remedying or mitigating other adverse effects on other values; and</del> c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> ... <u>g) Recognising and providing for the use of such resources including as places where productive activities, tourism, recreation, infrastructure, homes and work places are located.</u> h) <u>Allowing values to adapt over time as communities and economies change.</u> "	<ul style="list-style-type: none"> <li>• Level of protection not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it.</li> <li>• Better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category.</li> <li>• The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend as follows: "Preserve or enhance the natural character values of the coastal environment, by: a) <del>Avoiding adverse effects of activities on natural character in areas of the coastal environment with</del> <u>on those values which contribute to the</u> outstanding natural character of an area; and b) <del>Avoiding significant adverse effects and avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment</del> <u>on those values which contribute to the high natural character values of an area; and</u> c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> d) <del>Avoiding, remedying or mitigating other adverse effects on other values; and...</del> "	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend as follows: " <del>Protect</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding water bodies and wetlands by: a) <del>Avoiding significant adverse effects from inappropriate subdivision, use and development</del> , including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and ... <del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				...	
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	Amend as follows: "Policy 2.2.14 Identifying <del>highly valued</del> <u>regionally significant</u> soil resources Identify areas and values of <del>highly valued</del> <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Amend as follows: "Policy 2.2.15 Managing <del>highly valued</del> <u>regionally significant</u> soil resources Protect the values of <del>areas of highly valued</del> <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects <del>from inappropriate subdivision, use and development</del> on those values which contribute to the soil being <del>highly valued</del> <u>regionally significant</u> ; and ... -e) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and d) Recognising that <del>loss of regionally significant soils to urban expansion development</del> may be appropriate <del>near</del> <u>near</u> <del>due to location and proximity to existing urban development, and infrastructure particularly when there is a lack of supply of land available for urban development.</del> "	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend as follows: " <del>Natural resource s</del> Systems and their interdependencies are recognised"	No reason given.
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Add the following policy: " <u>Applying an integrated management approach for significant infrastructure and activities that affect significant infrastructure</u> <u>Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure, by:</u> a) <u>Promoting consistent corridor management throughout the region.</u> "	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>• Amend a) as follows: "a) Taking into account the impacts of management of one resource on the <u>environmental</u> values of another, or on the environment in general; and"</li> <li>• Add the following clauses: " c) <u>Ensuring that resource objectives are complementary across administrative boundaries; and</u> d) <u>Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete policy.	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
66	Objectives on resilience, health and safety	Issue 3.1 - Risk of overreaching the environment's carrying capacity	Amend	Amend as follows: " <del>Activities that utilise resources -are undertaken-</del> without regard to <del>their local- environmental values -are at greater risk inappropriately compromising -of overreaching that- the</del> environment's ability to sustain the activity."	No reason given.
70	Objectives on resilience, health and safety	Issue 3.5 - Importance of infrastructure of regional or national significance	Amend	Amend as follows: " <del>It is important to recognise and provide for Significant Infrastructure -of regional and national significance- even though it may result in local- adverse environmental effects -impacts, or adversely affect other nationally important values-...</del> "	Significant infrastructure should be defined, recognised and provided for.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Protection, <del>subdivision,</del> use and development of <del>natural and physical</del> resources recognises environmental constraints".	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising <del>natural and physical</del> environmental constraints Recognise the <del>natural and physical</del> environmental constraints of <del>resources -an area-, the environmental effects of those constraints on activities utilising those resources , and the environmental effects of those activities on those constraints, -including with particular recognition of :</del> ... c) The sensitivity of <del>the natural and physical</del> resources to adverse effects from the proposed activity/land use; and ..."	No reason given.
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Amend Objective 3.2 as follows: " <del>Inappropriate</del> risk that natural hazards pose to Otago's communities are minimised"	Designing to a 100 year level may be appropriate, but it would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities ; <del>including hazards of low likelihood and high consequence-."</del>	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows: "Manage natural hazard risk, <del>including- with particular</del> regard to: a) The risk <del>they- posed,</del> considering the likelihood and consequences of natural hazard events; and ..."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend 1st sentence as follows: "Assess activities <del>in areas known to be subject to an identified, -for-</del> natural hazard risk, by considering:..."	No reason given.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Policy 3.2.6 Avoiding increased natural hazard risk <del>from inappropriate subdivision, use and development</del> Avoid , remedy or mitigate increased	<ul style="list-style-type: none"> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• It would often not be reasonable to design to a 1000 year event or</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<del>increasing</del> natural hazard risk <u>from inappropriate subdivision, use and development, including by:...</u>	greater (which "avoidance" may imply).
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend 1st sentence as follows: "Reduce existing natural hazard risk, <del>including particularly by:</del> ".	No reason given.
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) There is significant <del>public or environmental</del> benefit in doing so; or b) The work relates to the functioning ability of <u>significant infrastructure, a lifeline utility, or facility used for essential or emergency services, or a significant community facility.</u> "	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ... b) Designing infrastructure to take into account: ... iv. <del>Natural and physical</del> Resource constraints; and v. Effects on the values of natural and physical resources; and ... c) Managing urban growth <u>in a coordinated manner to ensure:</u> i. <del>Within areas that have</del> sufficient infrastructure <u>services are provided</u> capacity; or ii. <del>Where infrastructure services can be upgraded or extended</del> efficiently and effectively; and d) <del>Co-ordinating the design and development of infrastructure with the staging of land use change, including with:</del> i. <del>Structural design and release of land for new urban development;</del> or ii. <del>Structural redesign and redevelopment within existing urban areas.</del> "	<ul style="list-style-type: none"> <li>• Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community costs than benefits in high growth areas.</li> <li>• Regulation of the release of land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend as follows: "Manage infrastructure activities, to: ... b) <del>Reduce</del> <u>Avoid, remedy or mitigate</u> adverse effects of those activities, including cumulative adverse effects on <del>natural and physical</del> resources; and c) Support economic, social and community <u>needs</u> activities; and d) Improve efficiency of use of <del>natural</del> resources; and e) Protect infrastructure corridors <u>from inappropriate subdivision, uses and development</u> <del>for infrastructure needs, now and for the future;</del> and ...	Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				g) Protect the functioning of <u>significant infrastructure</u> <del>lifeline utilities</del> and essential or emergency services."	
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend as follows: "Policy 3.4.3 Designing <del>lifeline utilities</del> <u>significant infrastructure</u> and facilities for essential or emergency services Design <del>lifeline utilities</del> <u>significant infrastructure</u> , and facilities for essential or emergency services, to:..."	No reason given.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, <del>lifeline utilities</del>, <u>significant infrastructure</u>, and essential and emergency services".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend as follows: " <u>Significant Infrastructure of national and regional significance is recognised and provided for managed in a sustainable way.</u> "	Significant infrastructure should be defined, recognised and provided for.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend as follows: "Policy 3.5.1 Recognising <u>and providing for</u> national and regional significance of infrastructure Recognise <u>and provide for</u> the national and regional significance of the following infrastructure: a) Renewable electricity generation facilities <del>where they supply the national electricity grid and local distribution network</del> ; and ... f) Structures for transportation by rail <u>and tourism activities</u> ."	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The PRPS does not give enough recognition of and provision for the tourism sector.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend as follows: "Policy 3.5.2 Managing adverse effects of <u>significant infrastructure that has national or regional significance</u> <del>Minimise Avoid, remedy or mitigate</del> adverse effects from <u>significant infrastructure that has national or regional significance</u> , by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in:</del> ... b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding</del> <u>minimising</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and ... d) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> e) <del>Considering</del> <u>Enabling infrastructure providers to employ the use of offsetting</u> or	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				other compensatory measures <u>to address</u> <del>for</del> residual adverse effects on <u>the environment</u> <del>indigenous biodiversity</del> ."	
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Protecting <u>significant</u> infrastructure <del>of national or regional significance</del>".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	Amend as follows: "Policy 3.6.2 Promoting small <u>and community</u> scale renewable electricity generation Promote small <u>and community</u> scale renewable electricity generation activities that : a) Increase the local community's resilience and security of energy supply; and b) <del>Avoid, remedy or mitigate adverse effects from that activity</del> ."	No reason given.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	<ul style="list-style-type: none"> <li>Amend 1st sentence as follows: "Protect the generation capacity of <u>nationally or regionally significant</u> renewable electricity generation activities, by..."</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	Amend as follows: <ul style="list-style-type: none"> <li>Delete d).</li> <li>"e) Protecting <del>existing</del> distribution corridors for infrastructure needs, now and for the future."</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	Amend as follows: "Encourage the use of good urban design principles in subdivision and development in urban areas <del>as detailed in Schedule 6</del> , to: ... b) Ensure that the built form relates well to its <u>surrounding</u> <del>natural</del> environment <del>including</del> by: i. <del>Reflecting natural features such as rivers, lakes, wetlands and topography;</del> and ii. <del>Providing for ecological corridors in urban areas;</del> and iii. <del>Protecting areas of indigenous biodiversity and habitat for indigenous fauna;</del> and iv. <del>Encouraging use of low impact design techniques;</del> and v. <del>Encouraging construction of warmer buildings</del> ; and ..."	<ul style="list-style-type: none"> <li>Schedule 6 not assessed in S32 report.</li> <li>Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>May be to the detriment of good urban design for specific sites.</li> </ul>
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>Schedule 6 not assessed in S32 report.</li> <li>Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>May be to the detriment of good urban design for specific sites.</li> </ul>
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend a) as follows: "a) <del>Maximising</del> <u>Optimising</u> passive solar gain; and"	No reason given.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend as follows: "Design <u>and maintain</u> public spaces, including streets and open spaces, to <u>provide for a range of uses and</u> <del>meeting the</del> "	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("including").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				reasonable access and mobility needs of all sectors within the community <del>including the young and those with mobility impairments.</del> "	
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	<p>Amend as follows:</p> <p>"Policy 3.8.1 <del>Managing</del> <u>Providing</u> for urban growth</p> <p><del>Manage</del> <u>Provide for</u> urban growth and creation of new urban land in a strategic and co-ordinated way, by:</p> <p>a) <del>Understanding demand and supply of</del> <u>Ensuring there is sufficient</u> residential, commercial and industrial <u>zoned</u> land capacity, <del>to</del> <u>and catering for that demand for</u> such land, <del>projected over at least the next 10 years;</del> and</p> <p>b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to:</p> <p>i. Provide infrastructure in an efficient and effective way; and</p> <p>ii. <del>Avoid</del> <u>Discouraging</u> additional costs <u>on the public</u>, that arise from unplanned infrastructure expansion; and</p> <p>c) Identifying future growth areas that:</p> <p>i. Minimise <u>significant</u> adverse effects on <del>rural</del> <u>the productivity of the rural and tourism</u> sectors, <del>including loss of highly valued soils or creating competing urban demand for water and other resources;</del> and</p> <p>ii. <u>Can be developed without resulting in significant adverse effects on any matter of national importance or national significance</u> <u>Maintain or enhance significant biodiversity, landscape or natural character values;</u> and</p> <p><del>iii. Maintain important cultural or heritage values; and</del></p> <p><del>iv.</del> <u>iii.</u> Avoid land with significant risk from natural hazards <u>which cannot be remedied or mitigated;</u> and</p> <p>d) Considering the need for urban growth boundaries to control <u>potentially inappropriate</u> urban expansion; and</p> <p>e) Ensuring efficient use of land; and</p> <p>f) Requiring the use of low or no-emission heating systems in buildings, <del>when</del> <u>where</u> ambient air quality <del>in or near the growth area</del> is:</p> <p>i. Below standards for human health; or</p> <p>ii. Vulnerable to degradation given the local climatic and geographical context; and</p> <p>g) Giving effect to the principles of good urban design <del>as detailed in Schedule 6;</del> and</p> <p>h) Giving effect to the principles of crime prevention through environmental design</p>	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community.</li> <li>• Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS.</li> <li>• "Considering the need for urban growth boundaries" should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential methods.</li> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban	Oppose	Delete the policy.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		growth boundaries or future urban development areas			<ul style="list-style-type: none"> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend as follows: "Manage subdivision, use and development of rural land, to: a) Avoid <del>inappropriate</del> development or fragmentation of land <del>, particularly</del> which undermines or forecloses the potential of rural land: i. For primary production <del>or tourism</del> ; or ... b) Have particular regard to whether the proposal will result in a loss of the productive potential of <del>regionally significant, highly versatile</del> soils, unless: i. The land adjoins an existing urban area and there is no other land suitable for urban expansion <del>, or there is a shortage of land available for urban development</del> ; and ii. <del>There highly versatile soils are needed for urban expansion,</del> any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and iii. reverse sensitivity effects on rural productive	<ul style="list-style-type: none"> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				activities can be <u>satisfactorily</u> avoided; and c) Avoid unplanned demand for provision of <u>public infrastructure investment</u> , including domestic water supply and waste disposal; and d) Avoid creating <u>significant</u> competing demand for water <del>or other</del> resources."	
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk</u> <del>harm</del> human health or the quality of the environment <del>in Otago</del> ".	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend c) as follows: "c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and".	No reason given.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Amend a) as follows: "a) Prior to subdivision or development of potentially contaminated land, <u>requiring</u> <del>ensuring</del> a site investigation is undertaken to determine the nature or extent of any contamination; and"	No reason given.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Amend as follows: "Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably degrade natural values</u> ".	<ul style="list-style-type: none"> <li>• Avoiding the creation of new contaminated land may not always be appropriate or practical: in remediating contaminated land it may be appropriate to move soil to another location depending on where it is situated and how that land is to be used.</li> <li>• The emphasis should be on avoiding risks to human health or the environment.</li> </ul>
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	<ul style="list-style-type: none"> <li>• Add the following objective: "Significant industry activities and physical resources are provided for".</li> <li>• Add the following policy: "Recognising and providing for significant industry activities and physical resources Recognising and providing for significant industry activities and physical resources, by: a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety; b) Protecting significant industry activities from inappropriate subdivision, use, and development; c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated."</li> <li>• Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to: a) Recognise that development, use, and protection of physical resources and the urban</li> </ul>	Regionally Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				environment enables people and communities to provide for their social, economic, and cultural well-being; b) Protect significant industry activities from inappropriate subdivision, use, and development; c) Enable significant industry activities and development that does not have a significant adverse effect on the environment; d) Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance."	
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Amend	Amend as follows: " <del>Sometimes, e</del> Existing businesses may be placed at risk by pressure to change- activities are susceptible to reverse sensitivity effects, particularly when land use changes -to activities that may compete or conflict, creating reverse sensitivities."	No reason given.
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows: " <del>Many natural and physical</del> resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users."	No reason given.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend as follows: "Maintain and <del>where possible,</del> enhance public access to the natural environment, including to the coast, lakes, rivers and their margins, and areas of cultural or historic significance, unless restricting access is necessary to: ... b) Protect the <del>natural heritage and ecosystem</del> values of sensitive natural areas or habitats; or..."	No reason given.
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: " <del>Significant h</del> Historic heritage resources are recognised and contribute to the region's character and sense of identity".	No reason given.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: " <del>Manage historic heritage values to p</del> Protect and enhance the values of places and areas of historic heritage <del>from inappropriate development</del> , by: ... c) Avoiding <del>remedying or mitigating</del> adverse effects on those values which contribute to the area or place being of regional or national significance; and <del>d) Avoiding significant adverse effects on other values of areas and places of historic heritage; and</del> e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and f) Remediating <del>when adverse effects on other values cannot be avoided; and</del> g) Mitigating <del>when adverse effects on other values cannot be avoided or remediated; and</del>	<ul style="list-style-type: none"> <li>• The PRPS does not correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				h) ..."	
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows: <del>"Managing for rural activities from inappropriate subdivision, use and development</del> <u>Protecting regionally significant industry activities</u> Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling <u>regionally significant industry activities</u> , <del>farming and other rural activities that support the rural economy</del> ; and b) Minimising the loss of <u>regionally significant soils highly valued for their versatility for primary production</u> ; and c) Restricting the establishment of activities <del>in rural areas</del> that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u> ; and d) <del>Minimising</del> <u>Restricting</u> the subdivision of productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and e) Providing for other activities that have a functional need to locate in rural areas <del>including tourism and recreational activities that are of a nature and scale compatible with rural activities</del> ."	<ul style="list-style-type: none"> <li>• Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.</li> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> </ul>
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Amend	Amend as follows: <del>"Recognising and providing for the values of Otago's central business districts</del> <u>Recognise and provide for the values of Otago's central business districts</u> , including as the primary focal point for social, cultural and economic activities within a community."	No reason given.
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	Amend as follows: "Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of <del>the</del> <u>Otago's</u> central business districts and support local commercial needs, by: a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and ... c) Avoiding unplanned extension of commercial activities that has significant adverse effects on <del>the</del> <u>a</u> central business district, including on the efficient use of infrastructure, employment and services; and ..."	No reason given.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	Amend as follows: "Manage the finite nature of land suitable and available for industrial activities, by: a) Providing specific areas to accommodate <del>the effects of</del> industrial activities; and b) Providing a range of land suitable for different industrial activities <del>including land extensive activities</del> ; and	No reason given.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				c) Restricting the establishment of activities in industrial areas that may result in: i. Reverse sensitivity effects <u>on industrial activities</u> ; or ii. Inefficient use of industrial land or infrastructure."	
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend as follows: "Managing locational needs for mineral and gas exploration, extraction and processing Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Giving preference to avoiding their location in</del> <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> : i. ... b) Restricting the establishment of <del>those</del> activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities</u> ."	No reason given.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in</del> : ... <del>e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and,</del> ... g) Considering the use of offsetting, or compensatory measures, <u>to address</u> <del>for</del> residual adverse effects <u>on the environment</u> ; and ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values <del>only</del> when: a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and b) Those <u>adverse</u> effects cannot be avoided, remedied or mitigated; and c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."	<ul style="list-style-type: none"> <li>• The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection.</li> <li>• Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Amend as follows: <del>Providing for</del> <u>Offsetting for</u> <del>from</del> <u>adverse effects on</u> indigenous biodiversity <del>Provide for offsetting for</del> <u>from</u> <u>adverse effects</u>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				on indigenous biodiversity, when it is enabled, by ensuring that: a) The offset achieves no net loss <del>and preferably a net gain</del> in indigenous biodiversity values; and b) The offset is undertaken close to the location of development <del>, where this will result in the best ecological outcome</del> ; and..."	
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	Add the following method: "1.1.4 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."	No reason given.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<ul style="list-style-type: none"> <li>Amend Method 1.2.1 as follows: "Identify <del>and protect from inappropriate subdivision, use and development</del>, places, areas or landscapes of cultural, spiritual or traditional significance to them;"</li> <li>Amend Method 1.2.2 as follows: "Identify, and protect <del>from inappropriate subdivision, use and development</del>, the values that contribute to their significance;"</li> <li>Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</li> </ul>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Oppose	Delete Method 1.4.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Oppose	Delete Method 2.2	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Oppose	Delete Method 2.3.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting <del>from inappropriate subdivision, use and development</del> , historic heritage places <del>or</del> ; areas <del>or landscapes</del> located in the beds of rivers, lakes and wetlands or the coastal marine area;"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.12.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7.	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend Method 4.2.1 as follows: "City or district councils will implement Policies 3.2.2 and 3.2.3 <u>to the extent applicable</u> when undertaking natural hazard assessments".	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> </ul> No reason given.
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS:               <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend Method 6.1.2 as follows: "Regional, city and district councils, in their areas of responsibility, will identify: ... <del>d) Special amenity landscapes;</del> ... <u>q) Regionally significant soil resources;</u> <u>h) Significant infrastructure.</u> "	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> <li>• Most of Queenstown Lakes areas that are Not Outstanding Natural Landscapes could fall within this category. Too high a level of protection could have adverse effects on the economic and social wellbeing of communities.</li> <li>• Significant infrastructure should be defined, recognised and provided for.</li> </ul>
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Oppose	Delete Method 7.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
211	Method 8 - Education and Information	Method 8.1.1 - Information from regional, district and city councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
214	Method 8 - Education and Information	Method 8.1.4 - Information from city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
215	Method 9 - Funding	Method 9 - Funding	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
220	Method 11 - Advocacy and Facilitation	Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional	Oppose	Delete Methods.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Amend d) as follows: "d) Facilitate coordination between <del>lifeline utilities</del> <u>significant infrastructure and significant community facilities used</u> for emergency management, including by: i) Recognising the interconnections between <u>significant infrastructure</u> <del>lifeline utilities</del> ;..."	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
225	Method 11 - Advocacy and Facilitation	Method 11.2.3 - Facilitation by regional, city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
248	Appendices	Appendices - general	Oppose	<ul style="list-style-type: none"> <li>• Delete Appendix 1.</li> <li>• Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS.</li> </ul>	<ul style="list-style-type: none"> <li>• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and</li> <li>• Is not required by RMA S62 or is not an active directive.</li> </ul>
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>• Add the following definitions: <ul style="list-style-type: none"> <li>• Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance;</li> <li>• Significant Community Facility - include facilities that provide essential community services;</li> <li>• Urban;</li> <li>• Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS;</li> <li>• Regionally Significant Industry Activity - include any activity associated with tourism or primary production;</li> <li>• Hard mitigation measures;</li> </ul> </li> <li>• Amend definition of Kai Tahu to clarify if has the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning documents outside Otago.</li> </ul>	To reduce ambiguity and enable more efficient implementation of the PRPS.
250	Glossaries	Glossary of Te Reo terms	Oppose	Delete and include these terms in the Glossary.	Unnecessary to have 2 separate glossaries.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Delete or amend text that: <ul style="list-style-type: none"> <li>• Is duplicated;</li> <li>• Is vague or ambiguous;</li> <li>• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation;</li> <li>• Is not required by RMA S62 or is not an active directive; and</li> <li>• Delete all "need" statements.</li> </ul>	<ul style="list-style-type: none"> <li>• Efficiency gains in removing unnecessary provisions.</li> <li>• Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>• "Need" statements are not required by RMA S62 or is not an active directive.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	<ul style="list-style-type: none"> <li>• Any consequential or other amendments required to give effect, or like effect, to any matter raised in the submission.</li> </ul>	No reason given.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	<ul style="list-style-type: none"> <li>• Retention of all provisions as notified, except as requested in the submission.</li> </ul>	No reason given.
6	Overall approach	Schedule 3 - Significance threshold	Oppose	<ul style="list-style-type: none"> <li>• Delete; or</li> <li>• Amend so it is consistent with case law and insert new criteria to reflect the need to consider offsetting or compensation and to reflect environmental/planning context on a case-by-case basis, e.g.: <ul style="list-style-type: none"> <li>* 11. Ability for offsetting or compensation:</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• The S32 report does not evaluate Schedule 3.</li> <li>• Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant.</li> <li>• Schedule 3 criteria are broad, unhelpful, and inconsistent with case</li> </ul>

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				<p>The extent to which the adverse effect can be directly offset or otherwise compensated, and consequently reducing the significance of the effect.</p> <ul style="list-style-type: none"> <li>• 12. Environmental Context: The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</li> <li>• 13. Matters of national importance and national significance: The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA. The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS." </li></ul>	law.
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Amend	Amend as follows: "The principles of Te Tiriti o Waitangi are <u>identified and</u> taken into account in resource management decisions".	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	<p>Amend as follows: "Policy 1.1.2 <u>Identifying and</u> taking the principles of Te Tiriti o Waitangi into account</p> <p>Ensure that local authorities <del>exercise their functions and powers, to</del> take into account the <u>principles of Te Tiriti o Waitangi identified in Appendix 1A by</u> :</p> <p>a) <del>Providing</del> <u>Accord</u> Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,</p> <p>b) <del>Involve</del> <u>Involving</u> Kai Tahu in resource management decision-making processes and implementation; and</p> <p>c) <del>Take</del> <u>Taking</u> into account Kai Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taoka ; and</p> <p>d) <del>Ensure</del> <u>Ensuring</u> Kai Tahu have the prerogative to:</p> <ol style="list-style-type: none"> <li>i. <del>Identify</del> <u>Identifying</u> their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and</li> <li>ii. <del>Determine</del> <u>Determining</u> how best to express that relationship; and</li> </ol> <p>e) <del>Ensure</del> <u>Ensuring</u> Kai Tahu are able to exercise kaitiakitaka; and</p> <p>f) <del>Ensure</del> <u>Ensuring</u> that district and regional plans:</p> <ol style="list-style-type: none"> <li>i. <del>Give</del> <u>Giving</u> effect to the Ngai Tahu Claims Settlement Act 1998; and</li> <li>ii. <del>Recognise</del> <u>Recognising</u> and <del>provide</del> <u>providing</u> for statutory acknowledgement areas, as detailed in Schedule 2; and</li> </ol>	Use wording of RMA Part 2.

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				iii. <del>Provide</del> <u>Providing</u> for other areas in Otago that are recognised as significant to Kai Tahu in a manner similar to that prescribed for statutory acknowledgement areas."	
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Objective 1.2 Kai Tahu values, rights and interests and customary resources are <u>identified and</u> sustained."	No reason given.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) Ensuring <u>sustainable management of</u> resources supports <del>their</del> customary uses and cultural values (as detailed in Schedules 1A and B); and"	No reason given.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> on those values and sites <del>, as detailed in Schedule 3;</del> and"	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<ul style="list-style-type: none"> <li>• Amend b) as follows: "b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and"</li> <li>• Delete c).</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Specify or identify "other cultural values" referred to in other parts of the RPS in Schedule 1A.	No reason given.
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	Amend Issue as follows: "Degradation of <u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time <del>will</del> <u>can</u> cause serious damage."	Regional issues include natural resource management issues.
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected <u>from inappropriate subdivision, use and development</u> ."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <del>Natural</del> <u>Environmental</u> systems <u>and resources</u> are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely affects the <u>environmental</u> value of another..."	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural <del>and physical</del> resources are recognised, <u>and protected from inappropriate subdivision, use and development</u> <del>, maintained and enhanced.</del> "	<ul style="list-style-type: none"> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> </ul>
31	Natural resource value	Policy 2.1.1 - Managing for	Amend	Amend Policy as follows: "Recognise <u>regionally</u>	• Amendment to reflect the RMA Part 2 direction in terms of protecting

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	management - general	freshwater values		<p><u>significant</u>, freshwater values, and manage freshwater, to:</p> <p>...</p> <p>c) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u>; and</p> <p>d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u>, unless detrimental to indigenous biodiversity; and</p> <p>...</p> <p>j) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u>; and</p> <p>k) Provide for other cultural values <u>as identified in Schedule 1A</u>; and</p> <p>l) Protect important recreation values <u>from inappropriate subdivision, use and development</u>; and</p> <p>..."</p>	<p>matters of national importance from inappropriate subdivision, use and development.</p> <ul style="list-style-type: none"> <li>• The PRPS should be focused on resource management issues of regional significance.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	<p>Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to:</p> <p>...</p> <p>b) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u>; and</p> <p>...</p> <p>g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u>; and</p> <p>h) Provide for other cultural values <u>as identified in Schedule 1A</u>; and..."</p>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	<p>Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to:</p> <p>...</p> <p>c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u>, unless detrimental to indigenous biodiversity; and</p> <p>...</p> <p>g) Provide for other cultural values <u>as identified in Schedule 1A</u>; and</p> <p>h) Protect important recreation values <u>from inappropriate subdivision, use and development</u>; and</p> <p>..."</p>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend b) as follows: "b)Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	<p>Amend as follows: "Recognise soil values <u>that are of a regional significance</u>, and manage <u>those</u> soils, to:</p> <p>...</p> <p><del>f) Retain-</del> <u>Ensure the primary use of regionally significant soil resources <u>is</u> for primary production <u>purposes</u></u>; and</p> <p>g) Protect Kai Tahu values <u>from inappropriate</u></p>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				subdivision, use and development ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and ... k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u> ; and ..."	
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Amend c) iii. as follows: "iii. Historical <del>and heritage</del> associations".	No reason given.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• As applies to all landscape assessments, including for "Special Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Add the following new policy: <u>"Managing cross boundary landscape effects Promote alignment of District Plans and integrated assessments of environmental effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries."</u>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries, which would benefit from a regionally integrated approach.</li> <li>• This proposed policy would be as effective as the provisions on Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: " <del>Protect and enhance Manage subdivision, use and development that affects</del> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects <del>on those values which contribute</del> <u>which will result in</u> to the area or habitat <u>losing its being</u> significant status ; and b) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on other values of the area or habitat; and <del>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes <del>, using the attributes as detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• These attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• Schedule 4 should be deleted</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: " <del>Protect, enhance and restore</del> <u>Manage subdivision, use and development that affects</u> the values of	<ul style="list-style-type: none"> <li>• Could disrupt the balance of the values of outstanding natural landscapes and features and other important values.</li> <li>• For example, ski fields are appropriate to locate in alpine</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>outstanding natural features, landscapes and seascapes, by:</p> <p>a) Avoiding adverse effects <del>on those values which contribute to</del> <u>which will result in the loss of the</u> significance of the natural feature, landscape or seascape; and</p> <p>...</p> <p><del>e) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del></p> <p>...</p> <p><u>g) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values</u></p> <p><u>(h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate</u>."</p>	<p>environments that may be considered outstanding natural landscapes.</p> <ul style="list-style-type: none"> <li>• Ensuring such businesses can continue to operate and provide an important recreational and economic resource to Otago should be borne in mind.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding <del>, using the attributes detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of different criteria being used in current or proposed district plans, and hence, creating inefficiencies and potentially slowing down forthcoming district plan reviews. These concerns also relation to Schedule 4.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social wellbeing of communities.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	<p>Amend as follows: "<del>Protect or enhance the values of</del> <u>Manage</u> special amenity landscapes and highly valued natural features, by:</p> <p>a) Avoiding <del>remedying or mitigating significant</del> adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and</p> <p><del>b) Avoiding, remedying or mitigating other adverse effects on other values; and</del></p> <p><del>e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del></p> <p>...</p> <p><u>g) Recognising and providing for the use of such resources including as places where productive activities, tourism, recreation, infrastructure, homes and work places are located.</u></p> <p><u>h) Allowing values to adapt over time as communities and economies change.</u>"</p>	<ul style="list-style-type: none"> <li>• Level of protection not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it.</li> <li>• Better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category.</li> <li>• The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend as follows: "Preserve or enhance the natural character values of the coastal environment, by: <p>a) Avoiding adverse effects <u>of activities on</u></p>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><del>natural character in areas of the coastal environment with</del> <del>on those values which contribute to the</del> outstanding natural character of an area; and</p> <p>b) Avoiding significant adverse effects <del>and avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment</del> <del>on those values which contribute to the high natural character values of an area;</del> and</p> <p>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</p> <p>d) <del>Avoiding, remedying or mitigating other adverse effects on other values;</del> and...</p>	
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	<p>Amend as follows: "<del>Protect</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding water bodies and wetlands by:</p> <p>a) Avoiding significant adverse effects <del>from inappropriate subdivision, use and development</del>, including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and</p> <p>...</p> <p><del>e) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> ..."</p>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	<p>Amend as follows:</p> <p>"Policy 2.2.14 Identifying <del>highly valued regionally significant</del> soil resources</p> <p>Identify areas and values of <del>highly valued regionally significant</del> soil resources, using the following criteria:</p> <p>..."</p>	No reason given.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	<p>Amend as follows:</p> <p>"Policy 2.2.15 Managing <del>highly valued regionally significant</del> soil resources</p> <p>Protect the values of <del>areas of highly valued regionally significant</del> soil resources, by:</p> <p>a) Avoiding significant adverse effects <del>from inappropriate subdivision, use and development</del> on those values which contribute to the soil being <del>highly valued</del> <u>regionally significant</u>; and</p> <p>...</p> <p><del>e) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del></p> <p>d) Recognising that <u>loss of regionally significant soils to</u> urban <del>expansion</del> <u>development</u> may be appropriate <u>near</u> <del>due to location and proximity to</del> existing urban development <del>and infrastructure</del> <u>particularly when there is a lack of supply of land available for urban development</u>."</p>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are	Amend	<p>Amend as follows: "<del>Natural resource s</del>Systems and their interdependencies are recognised"</p>	No reason given.

Ref	Issue	Provision recognised	Position	Decision Requested	Reason for Decision Requested
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Add the following policy: " <u>Applying an integrated management approach for significant infrastructure and activities that affect significant infrastructure</u> <u>Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure, by:</u> a) <u>Promoting consistent corridor management throughout the region.</u> "	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>Amend a) as follows: "a) Taking into account the impacts of management of one resource on the <u>environmental</u> values of another, or on the environment in general; and"</li> <li>Add the following clauses: " <u>c) Ensuring that resource objectives are complementary across administrative boundaries; and</u> <u>d) Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete policy.	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
66	Objectives on resilience, health and safety	Issue 3.1 - Risk of overreaching the environment's carrying capacity	Amend	Amend as follows: " <del>Activities that utilise resources are undertaken without regard to their local environmental values are at greater risk inappropriately compromising of overreaching that the environment's ability to sustain the activity.</del> "	No reason given.
70	Objectives on resilience, health and safety	Issue 3.5 - Importance of infrastructure of regional or national significance	Amend	Amend as follows: " <del>It is important to recognise and provide for Significant Infrastructure of regional and national significance even though it may result in local adverse environmental effects impacts, or adversely affect other nationally important values...</del> "	Significant infrastructure should be defined, recognised and provided for.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of <del>natural and physical</del> resources recognises environmental constraints".	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising <del>natural and physical</del> environmental constraints Recognise the <del>natural and physical</del> environmental constraints of <u>resources</u> <del>an area</del> , the <u>environmental</u> effects of those constraints on activities <u>utilising those resources</u> , and the <u>environmental</u> effects of those activities on those constraints, <del>including with particular recognition of:</del> ... c) The sensitivity of <del>the natural and physical</del>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				resources to adverse effects from the proposed activity/land use; and ..."	
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Amend Objective 3.2 as follows: " <del>Inappropriate</del> risk that natural hazards pose to Otago's communities are minimised"	Designing to a 100 year level may be appropriate, but it would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities ; <del>including hazards of low likelihood and high consequence.</del> "	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows: "Manage natural hazard risk, <del>including</del> with <u>particular</u> regard to: a) The risk <del>they</del> posed, considering the likelihood and consequences of natural hazard events; and ..."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend 1st sentence as follows: "Assess activities <u>in areas known to be subject to an identified</u> <del>for</del> natural hazard risk, by considering:..."	No reason given.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Policy 3.2.6 Avoiding increased natural hazard risk <u>from inappropriate subdivision, use and development</u> <del>increasing</del> natural hazard risk <u>from inappropriate subdivision, use and development</u> , including by:..."	<ul style="list-style-type: none"> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• It would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).</li> </ul>
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend 1st sentence as follows: "Reduce existing natural hazard risk, <del>including particularly, by:</del> "	No reason given.
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) There is significant <del>public or environmental</del> benefit in doing so; or b) The work relates to the functioning ability of <u>significant infrastructure, a lifeline utility, or facility used</u> for essential or emergency services , or a significant community facility ."	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ... b) Designing infrastructure to take into account: ... iv. <del>Natural and physical</del> Resource constraints; and v. Effects on the values of natural and physical resources; and ... c) Managing urban growth <u>in a coordinated manner to ensure</u> : <del>i. Within areas that have</del> sufficient infrastructure <u>services are provided</u> <del>capacity;</del> <del>or</del>	<ul style="list-style-type: none"> <li>• Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community costs than benefits in high growth areas.</li> <li>• Regulation of the release of land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><del>ii. Where infrastructure services can be upgraded or extended efficiently and effectively ; and</del></p> <p><del>d) Co-ordinating the design and development of infrastructure with the staging of land use change, including with:</del></p> <p><del>i. Structural design and release of land for new urban development; or</del></p> <p><del>ii. Structural redesign and redevelopment within existing urban areas."</del></p>	
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	<p>Amend as follows: "Manage infrastructure activities, to:</p> <p>...</p> <p>b) <del>Reduce</del> Avoid, remedy or mitigate, adverse effects of those activities, including cumulative adverse effects on <del>natural and physical</del> resources; and</p> <p>c) Support economic, social and community <del>needs</del> activities; and</p> <p>d) Improve efficiency of use of <del>natural</del> resources; and</p> <p>e) Protect infrastructure corridors <del>from inappropriate subdivision, uses and development</del>, for infrastructure needs, now and for the future; and</p> <p>...</p> <p>g) Protect the functioning of <u>significant infrastructure</u> <del>lifeline utilities</del> and essential or emergency services."</p>	Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	<p>Amend as follows:</p> <p>"Policy 3.4.3 Designing <del>lifeline utilities</del> <u>significant infrastructure</u> and facilities for essential or emergency services</p> <p>Design <del>lifeline utilities</del> <u>significant infrastructure</u> , and facilities for essential or emergency services, to:..."</p>	No reason given.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, <del>lifeline utilities</del>, <u>significant infrastructure</u>, and essential and emergency services".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	<p>Amend as follows: "<u>Significant</u> Infrastructure of <del>national and regional significance</del> is <del>recognised and provided for</del> <u>managed in a sustainable way</u>."</p>	Significant infrastructure should be defined, recognised and provided for.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	<p>Amend as follows:</p> <p>"Policy 3.5.1 Recognising <u>and providing for</u> <del>national and regional</del> significance of infrastructure</p> <p>Recognise <u>and provide for</u> the <del>national and regional</del> significance of the following infrastructure:</p> <p>a) Renewable electricity generation facilities ; <del>where they supply the national electricity grid and local distribution network</del>; and</p> <p>...</p>	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The PRPS does not give enough recognition of and provision for the tourism sector.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				f) Structures for transportation by rail <u>and tourism activities.</u> "	
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend as follows: "Policy 3.5.2 Managing adverse effects of <u>significant</u> infrastructure <del>that has national or regional significance</del> <del>Minimise</del> <u>Avoid, remedy or mitigate</u> adverse effects from <u>significant</u> infrastructure <del>that has national or regional significance</del> , by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in:</del> ... b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding</del> <u>minimising</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and ... d) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> e) <del>Considering</del> <u>Enabling infrastructure providers to employ</u> the use of offsetting <del>or</del> other compensatory measures <u>to address</u> <del>for</del> residual adverse effects on <u>the environment indigenous biodiversity</u> ."	<ul style="list-style-type: none"> <li>• Significant infrastructure should be defined, recognised and provided for.</li> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<ul style="list-style-type: none"> <li>• Amend header as follows: "Protecting <u>significant</u> infrastructure <del>of national or regional significance</del>".</li> <li>• Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>• Significant infrastructure should be defined, recognised and provided for.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	Amend as follows: "Policy 3.6.2 Promoting small <u>and community</u> scale renewable electricity generation Promote small <u>and community</u> scale renewable electricity generation activities that : a) <del>Increase the local community's resilience and security of energy supply; and</del> b) <del>Avoid, remedy or mitigate adverse effects from that activity."</del>	No reason given.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	<ul style="list-style-type: none"> <li>• Amend 1st sentence as follows: "Protect the generation capacity of <u>nationally or regionally significant</u> renewable electricity generation activities, by..."</li> <li>• Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	Amend as follows: <ul style="list-style-type: none"> <li>• Delete d).</li> <li>• "e) Protecting <del>existing</del> distribution corridors for infrastructure needs, now and for the future."</li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	Amend as follows: "Encourage the use of good urban design principles in subdivision and development in urban areas <del>as detailed in</del>	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Schedule 6-, to: ... b) Ensure that the built form relates well to its <del>surrounding</del> <del>natural</del> environment <del>, including</del> by: i. <del>Reflecting natural features such as rivers, lakes, wetlands and topography;</del> and ii. <del>Providing for ecological corridors in urban areas;</del> and iii. <del>Protecting areas of indigenous biodiversity and habitat for indigenous fauna;</del> and iv. <del>Encouraging use of low impact design techniques;</del> and v. <del>Encouraging construction of warmer buildings</del> ; and ..."	benefits. • May be to the detriment of good urban design for specific sites.
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend a) as follows: "a) <del>Maximising</del> <del>Optimising</del> passive solar gain; and"	No reason given.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend as follows: "Design and maintain public spaces, including streets and open spaces, to <u>provide for a range of uses and</u> meeting the reasonable access and mobility needs of all sectors within the community <del>, including the young and those with mobility impairments.</del> "	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Amend as follows: "Policy 3.8.1 <del>Managing</del> <u>Providing</u> for urban growth <del>Manage</del> <u>Provide for</u> urban growth and creation of new urban land in a strategic and co-ordinated way, by: a) <u>Understanding demand and supply of</u> <del>Ensuring there is sufficient</del> residential, commercial and industrial <u>zoned</u> land capacity, <del>to</del> <u>and catering for that</u> demand <del>for such land, projected over at least the next 10 years;</del> and b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to: i. Provide infrastructure in an efficient and effective way; and ii. <del>Avoid</del> <u>Discouraging</u> additional costs <u>on the public</u> that arise from unplanned infrastructure expansion; and c) Identifying future growth areas that: i. Minimise <u>significant</u> adverse effects on <del>rural the</del> productivity of the rural and tourism sectors <del>, including loss of highly valued soils or creating competing urban demand for water and other resources;</del> and ii. <u>Can be developed without resulting in</u>	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community.</li> <li>• Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS.</li> <li>• "Considering the need for urban growth boundaries" should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential methods.</li> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><del>significant adverse effects on any matter of national importance or national significance. Maintain or enhance significant biodiversity, landscape or natural character values; and</del></p> <p><del>iii. Maintain important cultural or heritage values; and</del></p> <p><del>iv. iii. Avoid land with significant risk from natural hazards which cannot be remedied or mitigated; and</del></p> <p>d) Considering the need for urban growth boundaries to control <u>potentially inappropriate</u> urban expansion; and</p> <p>e) Ensuring efficient use of land; and</p> <p>f) Requiring the use of low or no-emission heating systems in buildings, <del>when</del> <u>where</u> ambient air quality <del>in or near the growth area</del> is:</p> <p>i. Below standards for human health; or</p> <p>ii. Vulnerable to degradation given the local climatic and geographical context; and</p> <p>g) Giving effect to the principles of good urban design <del>, as detailed in Schedule 6;</del> and</p> <p>h) Giving effect to the principles of crime prevention through environmental design</p>	<p>District.</p> <ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	Delete the policy.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend as follows: "Manage subdivision, use and development of rural land, to: <p>a) Avoid <u>inappropriate</u> development or fragmentation of land, <u>particularly</u> which undermines or forecloses the potential of rural land:</p> <p>i. For primary production <u>or tourism</u>; or</p> <p>...</p> <p>b) Have particular regard to whether the proposal will result in a loss of the productive potential of <u>regionally significant</u> <del>highly versatile</del> soils, unless:</p> <p>i. The land adjoins an existing urban area and there is no other land suitable for urban expansion <u>or there is a shortage of land available for urban development</u>; and</p> <p>ii. <del>There highly versatile soils are needed for urban expansion,</del> any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and</p> <p>iii. reverse sensitivity effects on rural productive activities can be <u>satisfactorily</u> avoided; and</p> <p>c) Avoid unplanned demand for provision of <u>public</u> infrastructure <u>investment</u>, including domestic water supply and waste disposal; and</p> <p>d) Avoid creating <u>significant</u> competing demand for water <del>or other</del> resources."</p>	<ul style="list-style-type: none"> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk</u> <del>harm</del> human health or the quality of the environment <del>in Otago</del> ".	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend c) as follows: "c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and".	No reason given.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Amend a) as follows: "a) Prior to subdivision or development of potentially contaminated land, <u>requiring</u> <del>ensuring</del> a site investigation is undertaken to determine the nature or extent of any contamination; and"	No reason given.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Amend as follows: "Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably degrade natural values</u> ".	<ul style="list-style-type: none"> <li>• Avoiding the creation of new contaminated land may not always be appropriate or practical: in remediating contaminated land it may be appropriate to move soil to another location depending on where it is situated and how that land is to be used.</li> <li>• The emphasis should be on avoiding risks to human health or the environment.</li> </ul>
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	<ul style="list-style-type: none"> <li>• Add the following objective: "Significant industry activities and physical resources are</li> </ul>	Regionally Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>provided for".</p> <ul style="list-style-type: none"> <li>• Add the following policy: "Recognising and providing for significant industry activities and physical resources Recognising and providing for significant industry activities and physical resources, by: a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety; b) Protecting significant industry activities from inappropriate subdivision, use, and development; c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated."</li> <li>• Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to: a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and cultural well-being; b) Protect significant industry activities from inappropriate subdivision, use, and development; c) Enable significant industry activities and development that does not have a significant adverse effect on the environment; d) Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance."</li> </ul>	
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Amend	Amend as follows: " <del>Sometimes, existing businesses may be placed at risk by pressure to change -</del> <u>activities are susceptible to reverse sensitivity effects, particularly when land use changes - to activities that may compete or conflict, creating reverse sensitivities.</u> "	No reason given.
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows: " <del>Many natural and physical resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users.</del> "	No reason given.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend as follows: " <del>Maintain and, where possible,</del> enhance public access to the natural environment, including to the coast, lakes, rivers and their margins, and areas of cultural or historic significance, unless restricting access is	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				necessary to: ... b) Protect the <del>natural heritage and ecosystem</del> values of sensitive natural areas or habitats; or..."	
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: " <u>Significant h</u> Historic heritage resources are recognised and contribute to the region's character and sense of identity".	No reason given.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: " <u>Manage historic heritage values to p</u> Protect <del>and enhance</del> the values of places and areas of historic heritage <u>from inappropriate development</u> , by: ... c) Avoiding <u>remedying or mitigating</u> adverse effects on those values which contribute to the area or place being of regional or national significance; and <del>d) Avoiding significant adverse effects on other values of areas and places of historic heritage; and</del> e) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> f) <del>Remediating, when adverse effects on other values cannot be avoided; and</del> g) <del>Mitigating when adverse effects on other values cannot be avoided or remediated; and</del> h) ..."	<ul style="list-style-type: none"> <li>• The PRPS does not correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows: <del>"Managing for rural- Protecting regionally significant industry activities from inappropriate subdivision, use and development</del> Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling <u>regionally significant industry activities</u> , farming and other rural activities that support the rural economy; and b) Minimising the loss of <u>regionally significant soils highly valued for their versatility for primary production</u> ; and c) Restricting the establishment of activities <del>in rural areas</del> that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u> ; and d) <del>Minimising</del> <u>Restricting</u> the subdivision of productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and e) Providing for other activities that have a functional need to locate in rural areas <u>including tourism and recreational activities that are of a nature and scale compatible with rural activities</u> ."	<ul style="list-style-type: none"> <li>• Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.</li> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> </ul>
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Amend	Amend as follows: "Recognising <u>and providing for</u> the values of Otago's central business districts	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Recognise <u>and provide for</u> the values of Otago's central business districts, including as the primary focal point for social, cultural and economic activities within a community."	
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	Amend as follows: "Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of <del>the Otago's</del> central business districts and support local commercial needs, by: a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and ... c) Avoiding unplanned extension of commercial activities that has significant adverse effects on <del>the a</del> central business district, including on the efficient use of infrastructure, employment and services; and ..."	No reason given.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	Amend as follows: "Manage the finite nature of land suitable and available for industrial activities, by: a) Providing specific areas to accommodate <del>the effects of</del> industrial activities; and b) Providing a range of land suitable for different industrial activities, <del>including land extensive activities</del> ; and c) Restricting the establishment of activities in industrial areas that may result in: i. Reverse sensitivity effects <u>on industrial activities</u> ; or ii. Inefficient use of industrial land or infrastructure."	No reason given.
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend as follows: "Managing locational needs for mineral and gas exploration, extraction and processing Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Giving preference to avoiding their location in</del> <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> : i. ... b) Restricting the establishment of <del>these</del> activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities</u> ."	No reason given.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new</u>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>development is proposed that will result in significant adverse effect on -Giving preference to avoiding their location in:-</p> <p>...</p> <p>e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and,</p> <p>...</p> <p>g) Considering the use of offsetting, or compensatory measures, <u>to address</u> <del>for</del> residual adverse effects <u>on the environment</u>; and</p> <p>..."</p>	
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	<p>Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values <del>only</del> when:</p> <p>a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and</p> <p>b) Those <u>adverse</u> effects cannot be avoided, remedied or mitigated; and</p> <p>c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."</p>	<ul style="list-style-type: none"> <li>The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection.</li> <li>Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	<p>Amend as follows:</p> <p><del>"Providing for o</del>Offsetting <del>for</del> <u>from adverse effects on</u> indigenous biodiversity</p> <p>Provide for offsetting <del>for</del> <u>from adverse effects</u> on indigenous biodiversity, when <del>it is enabled</del>, <del>by ensuring that</del>:</p> <p>a) The offset achieves no net loss <del>and preferably a net gain</del> in indigenous biodiversity values; and</p> <p>b) The offset is undertaken close to the location of development <del>, where this will result in the best ecological outcome</del>; and..."</p>	No reason given.
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	<p>Add the following method: "1.1.4 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</p>	No reason given.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<ul style="list-style-type: none"> <li>Amend Method 1.2.1 as follows: "Identify <del>and</del> protect <u>from inappropriate subdivision, use and development</u>, places, areas or landscapes of cultural, spiritual or traditional significance to them;"</li> <li>Amend Method 1.2.2 as follows: "Identify, and protect <u>from inappropriate subdivision, use and development</u>, the values that contribute to their significance;"</li> <li>Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</li> </ul>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Oppose	Delete Method 1.4.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Oppose	Delete Method 2.2	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Oppose	Delete Method 2.3.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting <u>from inappropriate subdivision, use and development</u> , historic heritage places <u>or</u> areas <u>or</u> landscapes located in the beds of rivers, lakes and wetlands or the coastal marine area;"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.12.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7.	<ul style="list-style-type: none"> <li>• Efficiency gains in removing unnecessary provisions.</li> <li>• Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>• Unnecessary or ambiguous ("may").</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend Method 4.2.1 as follows: "City or district councils will implement Policies 3.2.2 and 3.2.3 <u>to the extent applicable</u> when undertaking natural hazard assessments".	No reason given.
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend Method 6.1.2 as follows: "Regional, city and district councils, in their areas of responsibility, will identify: ... -d) <u>Special amenity landscapes</u> ;	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural</li> </ul>

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				... g) Regionally significant soil resources; h) Significant infrastructure."	Landscapes could fall within this category. Too high a level of protection could have adverse effects on the economic and social wellbeing of communities. • Significant infrastructure should be defined, recognised and provided for.
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Oppose	Delete Method 7.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
211	Method 8 - Education and Information	Method 8.1.1 - Information from regional, district and city councils - optional	Oppose	Delete Method.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
214	Method 8 - Education and Information	Method 8.1.4 - Information from city and district councils - optional	Oppose	Delete Method.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
215	Method 9 - Funding	Method 9 - Funding	Oppose	Delete Method.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
220	Method 11 - Advocacy and Facilitation	Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional	Oppose	Delete Methods.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Amend d) as follows: "d) Facilitate coordination between <del>lifeline utilities</del> <u>significant infrastructure and significant community facilities used</u> for emergency management, including by: i) Recognising the interconnections between <u>significant infrastructure</u> , <del>lifeline utilities</del> ;..."	No reason given.
225	Method 11 - Advocacy and Facilitation	Method 11.2.3 - Facilitation by regional, city and district councils - optional	Oppose	Delete Method.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
248	Appendices	Appendices - general	Oppose	• Delete Appendix 1. • Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS.	• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and • Is not required by RMA S62 or is not an active directive.
249	Glossaries	Glossary	Amend	• Add the following definitions: • Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance; • Significant Community Facility - include facilities that provide essential community services; • Urban; • Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS; • Regionally Significant Industry Activity - include any activity associated with tourism or primary production; • Hard mitigation measures; • Amend definition of Kai Tahu to clarify if has the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning documents outside Otago.	To reduce ambiguity and enable more efficient implementation of the PRPS.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
250	Glossaries	Glossary of Te Reo terms	Oppose	Delete and include these terms in the Glossary.	Unnecessary to have 2 separate glossaries.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Delete or amend text that: <ul style="list-style-type: none"> <li>• Is duplicated;</li> <li>• Is vague or ambiguous;</li> <li>• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation;</li> <li>• Is not required by RMA S62 or is not an active directive; and</li> <li>• Delete all "need" statements.</li> </ul>	<ul style="list-style-type: none"> <li>• Efficiency gains in removing unnecessary provisions.</li> <li>• Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>• "Need" statements are not required by RMA S62 or is not an active directive.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	Any consequential or other amendments required to give effect, or like effect, to any matter raised in the submission.	No reason given.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Retention of all provisions as notified, except as requested in the submission.	No reason given.
6	Overall approach	Schedule 3 - Significance threshold	Oppose	<ul style="list-style-type: none"> <li>• Delete; or</li> <li>• Amend so it is consistent with case law and insert new criteria to reflect the need to consider offsetting or compensation and to reflect environmental/planning context on a case-by-case basis, e.g.: <ul style="list-style-type: none"> <li>• 11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly offset or otherwise compensated, and consequently reducing the significance of the effect.</li> <li>• 12. Environmental Context: The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</li> <li>• 13. Matters of national importance and national significance: The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA. The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS."</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• The S32 report does not evaluate Schedule 3.</li> <li>• Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant.</li> <li>• Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.</li> </ul>
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Amend	Amend as follows: "The principles of Te Tiriti o Waitangi are <u>identified and</u> taken into account in resource management decisions".	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	Amend as follows: "Policy 1.1.2 <u>Identifying and</u> <del>F</del> aking the principles of Te Tiriti o Waitangi into account Ensure that local authorities <del>-exercise their functions and powers, to-</del> <u>take into account the principles of Te Tiriti o Waitangi identified in Appendix 1A by :</u> a) <u>Providing</u> <del>Accord-</del> Kai Tahu a status distinct	Use wording of RMA Part 2.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,</p> <p>b) <del>Involve</del> <u>Involving</u> Kai Tahu in resource management decision-making processes and implementation; and</p> <p>c) <del>Take</del> <u>Taking</u> into account Kai Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taoka ; and</p> <p>d) <del>Ensure</del> <u>Ensuring</u> Kai Tahu have the prerogative to:</p> <p>i. <del>Identify</del> <u>Identifying</u> their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and</p> <p>ii. <del>Determine</del> <u>Determining</u> how best to express that relationship; and</p> <p>e) <del>Ensure</del> <u>Ensuring</u> Kai Tahu are able to exercise kaitiakitaka; and</p> <p>f) <del>Ensure</del> <u>Ensuring</u> that district and regional plans:</p> <p>i. <del>Give</del> <u>Giving</u> effect to the Ngai Tahu Claims Settlement Act 1998; and</p> <p>ii. <del>Recognise</del> <u>Recognising</u> and <del>provide</del> <u>providing</u> for statutory acknowledgement areas, as detailed in Schedule 2; and</p> <p>iii. <del>Provide</del> <u>Providing</u> for other areas in Otago that are recognised as significant to Kai Tahu in a manner similar to that prescribed for statutory acknowledgement areas."</p>	
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Objective 1.2 Kai Tahu values, rights and interests and customary resources are <u>identified and</u> sustained."	No reason given.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) Ensuring <u>sustainable management of</u> resources supports <del>their</del> customary uses and cultural values (as detailed in Schedules 1A and B); and"	No reason given.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> on those values and sites ,as detailed in <del>Schedule 3</del> ; and"	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• <u>Schedule 3 criteria are inadequate (see submission on Schedule 3).</u></li> </ul>
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<ul style="list-style-type: none"> <li>• Amend b) as follows: "b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and"</li> <li>• Delete c).</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• <u>Schedule 3 criteria are inadequate (see submission on Schedule 3).</u></li> </ul>
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Specify or identify "other cultural values" referred to in other parts of the RPS in Schedule 1A.	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	Amend Issue as follows: "Degradation of <u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time <del>will</del> <u>can</u> cause serious damage."	Regional issues include natural resource management issues.
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected <u>from inappropriate subdivision, use and development</u> ."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <del>Natural</del> <u>Environmental</u> systems <u>and resources</u> are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely affects the <u>environmental</u> value of another..."	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural <del>and physical</del> resources are recognised, <u>and protected from inappropriate subdivision, use and development</u> , <del>maintained and enhanced.</del> "	<ul style="list-style-type: none"> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to: ... c) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... j) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and k) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and l) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ... b) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and ... g) Protect Kai Tahu values <u>from inappropriate</u>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				subdivision, use and development ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and..."	
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... g) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and h) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend b) as follows: "b)Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those</u> soils, to: ... f) <del>Retain</del> <u>Ensure the primary use of regionally significant soil resources is</u> for primary production <u>purposes</u> ; and g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and ... k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Amend c) iii. as follows: "iii. Historical <del>and heritage</del> associations".	No reason given.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• As applies to all landscape assessments, including for "Special Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's	Amend	Add the following new policy:	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		significant and highly valued natural resources		<u>"Managing cross boundary landscape effects Promote alignment of District Plans and integrated assessments of environmental effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries."</u>	boundaries, which would benefit from a regionally integrated approach. <ul style="list-style-type: none"> <li>This proposed policy would be as effective as the provisions on Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: " <del>Protect and enhance Manage subdivision, use and development that affects</del> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects <del>on those values which contribute</del> which will result in to the area or habitat <del>losing its being</del> significant <del>status</del> ; and b) Avoiding significant adverse effects <del>from inappropriate subdivision, use and development</del> on other values of the area or habitat; and <del>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and ..."</del>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes <del>, using the attributes as detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>These attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>Schedule 4 should be deleted</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: " <del>Protect, enhance and restore. Manage subdivision, use and development that affects</del> the values of outstanding natural features, landscapes and seascapes, by: a) Avoiding adverse effects <del>on those values which contribute to</del> which will result in the <del>loss of the</del> significance of the natural feature, landscape or seascape; and ... <del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and ...</del> <u>g) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values</u> <u>(h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate</u> ."	<ul style="list-style-type: none"> <li>Could disrupt the balance of the values of outstanding natural landscapes and features and other important values.</li> <li>For example, ski fields are appropriate to locate in alpine environments that may be considered outstanding natural landscapes.</li> <li>Ensuring such businesses can continue to operate and provide an important recreational and economic resource to Otago should be borne in mind.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding <del>, using the attributes detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>Concerned about introducing the term of Special Amenity Landscapes.</li> <li>Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of different criteria being used in current or proposed district plans, and hence, creating inefficiencies and potentially slowing down forthcoming district plan reviews. These concerns also relation to Schedule 4.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social wellbeing of communities.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	<p>Amend as follows: "<del>Protect or enhance the values of. <u>Manage</u> special amenity landscapes and highly valued natural features, by:</del></p> <p>a) <del>Avoiding, <u>remedying or mitigating</u> significant</del> adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and</p> <p><del>b) Avoiding, <u>remedying or mitigating</u> other adverse effects on other values; and</del></p> <p>c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del></p> <p>...</p> <p><u>g) Recognising and providing for the use of such resources including as places where productive activities, tourism, recreation, infrastructure, homes and work places are located.</u></p> <p><u>h) Allowing values to adapt over time as communities and economies change.</u>"</p>	<ul style="list-style-type: none"> <li>• Level of protection not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it.</li> <li>• Better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category.</li> <li>• The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	<p>Amend as follows: "Preserve or enhance the natural character values of the coastal environment, by:</p> <p>a) <del>Avoiding adverse effects <u>of activities on natural character in areas of the coastal environment with</u> on those values which contribute to the outstanding natural character of an area; and</del></p> <p>b) <del>Avoiding significant adverse effects <u>and avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment</u> on those values which contribute to the high natural character values of an area; and</del></p> <p>c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del></p> <p>d) <del>Avoiding, remedying or mitigating other adverse effects on other values; and...</del>"</p>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	<p>Amend as follows: "<del>Protect- <u>Manage subdivision, use and development that affects</u> the values of outstanding water bodies and wetlands by:</del></p> <p>a) <del>Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> , including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and</del></p> <p>...</p> <p><del>e) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del></p> <p>..."</p>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
56	Highly valued natural resources -	Policy 2.2.14 - Identifying highly	Amend	Amend as follows:	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	soil resources	valued soil resources		"Policy 2.2.14 Identifying <del>highly-valued regionally significant</del> soil resources Identify areas and values of <del>highly-valued regionally significant</del> soil resources, using the following criteria: ..."	
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Amend as follows: "Policy 2.2.15 Managing <del>highly-valued regionally significant</del> soil resources Protect the values of <del>areas of highly-valued regionally significant</del> soil resources, by: a) Avoiding significant adverse effects <del>from inappropriate subdivision, use and development</del> on those values which contribute to the soil being <del>highly-valued- regionally significant</del> ; and ... -c) <del>Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> d) Recognising that <del>loss of regionally significant soils to urban expansion</del> <u>development</u> may be appropriate <u>near</u> <del>due to location and proximity to</del> existing urban development <del>and infrastructure</del> <u>particularly when there is a lack of supply of land available for urban development.</u> "	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend as follows: " <del>Natural resource s</del> Systems and their interdependencies are recognised"	No reason given.
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Add the following policy: " <u>Applying an integrated management approach for significant infrastructure and activities that affect significant infrastructure</u> <u>Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure, by:</u> a) <u>Promoting consistent corridor management throughout the region.</u> "	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>• Amend a) as follows: "a) Taking into account the impacts of management of one resource on the <u>environmental</u> values of another, or on the environment in general; and"</li> <li>• Add the following clauses: " <u>c) Ensuring that resource objectives are complementary across administrative boundaries; and</u> <u>d) Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete policy.	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
66	Objectives on resilience, health and safety	Issue 3.1 - Risk of overreaching the environment's carrying capacity	Amend	Amend as follows: "Activities that <u>utilise resources</u> <del>are undertaken</del> without regard to their <del>local</del> environmental values <del>are at greater risk</del> <u>inappropriately compromising</u> <del>of overreaching that</del> <u>the</u> environment's ability to sustain the activity."	No reason given.
70	Objectives on resilience, health and safety	Issue 3.5 - Importance of infrastructure of regional or national significance	Amend	Amend as follows: " <u>It is important to recognise and provide for Significant Infrastructure of regional and national significance</u> <del>even though it may result in local adverse environmental effects</del> <del>impacts, or adversely affect other nationally important values...</del> "	Significant infrastructure should be defined, recognised and provided for.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of <del>natural and physical</del> resources recognises environmental constraints".	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising <del>natural and physical</del> environmental constraints Recognise the <del>natural and physical</del> environmental constraints of <u>resources</u> <del>an area</del> , the <u>environmental</u> effects of those constraints on activities <u>utilising those resources</u> , and the <u>environmental</u> effects of those activities on those constraints, <del>including with particular recognition of</del> : ... c) The sensitivity of <del>the natural and physical</del> resources to adverse effects from the proposed activity/land use; and ..."	No reason given.
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Amend Objective 3.2 as follows: " <u>Inappropriate</u> risk that natural hazards pose to Otago's communities are minimised"	Designing to a 100 year level may be appropriate, but it would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities <del>including hazards of low likelihood and high consequence</del> ."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows: "Manage natural hazard risk, <del>including</del> with <u>particular</u> regard to: a) The risk <del>they</del> posed, considering the likelihood and consequences of natural hazard events; and ..."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend 1st sentence as follows: "Assess activities <u>in areas known to be subject to an identified</u> <del>for</del> natural hazard risk, by considering:..."	No reason given.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Policy 3.2.6 Avoiding increased natural hazard risk <u>from inappropriate subdivision, use and development</u> Avoid <u>remedy or mitigate increased</u> <del>increasing</del> natural hazard risk <u>from inappropriate subdivision, use and development</u> "	<ul style="list-style-type: none"> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• It would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend 1st sentence as follows: "Reduce existing natural hazard risk, <del>including particularly by:</del> "	No reason given.
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) There is significant <del>public or environmental</del> benefit in doing so; or b) The work relates to the functioning ability of <u>significant infrastructure, a lifeline utility, or facility used for essential or emergency services, or a significant community facility.</u> "	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ... b) Designing infrastructure to take into account: ... iv. <del>Natural and physical r</del> Resource constraints; and v. Effects on the values of natural and physical resources; and ... c) Managing urban growth <u>in a coordinated manner to ensure</u> : i. <del>Within areas that have</del> sufficient infrastructure <u>services are provided</u> <del>capacity;</del> <del>or</del> ii. <del>Where infrastructure services can be upgraded or extended</del> efficiently and effectively ; <del>and</del> d) <del>Co-ordinating the design and development of infrastructure with the staging of land use change, including with:</del> i. <del>Structural design and release of land for new urban development;</del> or ii. <del>Structural redesign and redevelopment within existing urban areas.</del> "	<ul style="list-style-type: none"> <li>• Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community costs than benefits in high growth areas.</li> <li>• Regulation of the release of land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend as follows: "Manage infrastructure activities, to: ... b) <del>Reduce</del> <u>Avoid, remedy or mitigate</u> adverse effects of those activities, including cumulative adverse effects on <del>natural and physical</del> resources; and c) Support economic, social and community <u>needs</u> <del>activities</del> ; and d) Improve efficiency of use of <del>natural</del> resources; and e) Protect infrastructure corridors <u>from inappropriate subdivision, uses and development</u> <del>for infrastructure needs, now and for the future</del> ; and ... g) Protect the functioning of <u>significant infrastructure, lifeline utilities</u> <del>and essential or</del>	Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				emergency services."	
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend as follows: "Policy 3.4.3 Designing <del>lifeline utilities</del> <u>significant infrastructure</u> and facilities for essential or emergency services Design <del>lifeline utilities - significant infrastructure</del> , and facilities for essential or emergency services, to:..."	No reason given.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, <del>lifeline utilities - , significant infrastructure</del> , and essential and emergency services".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend as follows: " <u>Significant</u> Infrastructure of national and regional significance is recognised and provided for <del>managed in a sustainable way</del> ."	Significant infrastructure should be defined, recognised and provided for.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend as follows: "Policy 3.5.1 Recognising <u>and providing for</u> national and regional significance of infrastructure Recognise <u>and provide for</u> the <del>national and regional</del> significance of the following infrastructure: a) Renewable electricity generation facilities <del>where they supply the national electricity grid and local distribution network</del> ; and ... f) Structures for transportation by rail <u>and tourism activities</u> ."	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The PRPS does not give enough recognition of and provision for the tourism sector.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend as follows: "Policy 3.5.2 Managing adverse effects of <u>significant</u> infrastructure <del>that has national or regional significance</del> <del>Minimise - Avoid, remedy or mitigate</del> adverse effects from <u>significant</u> infrastructure <del>that has national or regional significance</del> , by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in</del> : ... b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding</del> <u>minimising</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and ... d) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> e) <del>Considering</del> <u>Enabling infrastructure providers to employ</u> the use of offsetting <del>or</del> other compensatory measures <u>to address</u> <del>for</del> residual adverse effects on <u>the environment</u>	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				indigenous biodiversity."	
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Protecting <u>significant</u> infrastructure <del>of national or regional significance</del>".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	<p>Amend as follows:</p> <p>"Policy 3.6.2 Promoting small <u>and community</u> scale renewable electricity generation  Promote small <u>and community</u> scale renewable electricity generation activities that :</p> <p>a) Increase the local community's resilience and security of energy supply; and  b) Avoid, remedy or mitigate adverse effects from that activity."</p>	No reason given.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	<ul style="list-style-type: none"> <li>Amend 1st sentence as follows: "Protect the generation capacity of <u>nationally or regionally significant</u> renewable electricity generation activities, by..."</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	<p>Amend as follows:</p> <ul style="list-style-type: none"> <li>Delete d).</li> <li>"e) Protecting <del>existing</del> distribution corridors for infrastructure needs, now and for the future."</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	<p>Amend as follows: "Encourage the use of good urban design principles in subdivision and development in urban areas , as detailed in Schedule 6, to:</p> <p>...</p> <p>b) Ensure that the built form relates well to its <u>surrounding</u> ,<del>natural</del> environment ,<del>including</del> by:</p> <p>i. <del>Reflecting natural features such as rivers, lakes, wetlands and topography;</del> and  ii. <del>Providing for ecological corridors in urban areas;</del> and  iii. <del>Protecting areas of indigenous biodiversity and habitat for indigenous fauna;</del> and  iv. <del>Encouraging use of low impact design techniques;</del> and  v. <del>Encouraging construction of warmer buildings</del> ; and  ..."</p>	<ul style="list-style-type: none"> <li>Schedule 6 not assessed in S32 report.</li> <li>Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>May be to the detriment of good urban design for specific sites.</li> </ul>
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>Schedule 6 not assessed in S32 report.</li> <li>Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>May be to the detriment of good urban design for specific sites.</li> </ul>
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend a) as follows: "a) <del>Maximising</del> <u>Optimising</u> passive solar gain; and"	No reason given.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend as follows: "Design <u>and maintain</u> public spaces, including streets and open spaces, to <u>provide for a range of uses and</u> meeting the reasonable access and mobility needs of all sectors within the community , <del>including the</del>	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("including").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	<p>Amend as follows:  <del>"Policy 3.8.1 - Managing</del> <u>Providing</u> for urban growth  <del>-Manage</del> <u>Provide for</u> urban growth and creation of new urban land in a strategic and co-ordinated way, by:</p> <p>a) <u>Understanding demand and supply of</u> <del>Ensuring there is sufficient</del> residential, commercial and industrial <u>zoned</u> land capacity, <del>to</del> <u>and catering for that</u> demand <del>for such land, projected over at least the next 10 years;</del> and</p> <p>b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to:</p> <p>i. Provide infrastructure in an efficient and effective way; and</p> <p>ii. <del>Avoid</del> <u>Discouraging</u> additional costs <u>on the public</u> that arise from unplanned infrastructure expansion; and</p> <p>c) Identifying future growth areas that:</p> <p>i. Minimise <u>significant</u> adverse effects on <del>rural the</del> <u>productivity of the rural and tourism sectors</u>, <del>including loss of highly valued soils or creating competing urban demand for water and other resources;</del> and</p> <p>ii. <u>Can be developed without resulting in significant adverse effects on any matter of national importance or national significance. Maintain or enhance significant biodiversity, landscape or natural character values; and</u>  <u>iii. Maintain important cultural or heritage values; and</u>  <del>iv. iii.</del> Avoid land with significant risk from natural hazards <u>which cannot be remedied or mitigated</u>; and</p> <p>d) Considering the need for urban growth boundaries to control <u>potentially inappropriate</u> urban expansion; and</p> <p>e) Ensuring efficient use of land; and</p> <p>f) Requiring the use of low or no-emission heating systems in buildings, <del>when</del> <u>where</u> ambient air quality <del>in or near the growth area</del> is:</p> <p>i. Below standards for human health; or</p> <p>ii. Vulnerable to degradation given the local climatic and geographical context; and</p> <p>g) Giving effect to the principles of good urban design, <del>as detailed in Schedule 6;</del> and</p> <p>h) Giving effect to the principles of crime prevention through environmental design</p>	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community.</li> <li>• Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS.</li> <li>• "Considering the need for urban growth boundaries" should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential methods.</li> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	Delete the policy.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</p> <ul style="list-style-type: none"> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<p>Amend as follows: "Manage subdivision, use and development of rural land, to:</p> <p>a) Avoid <u>inappropriate</u> development or fragmentation of land <u>, particularly</u> which undermines or forecloses the potential of rural land:</p> <p>i. For primary production <u>or tourism</u>; or</p> <p>...</p> <p>b) Have particular regard to whether the proposal will result in a loss of the productive potential of <u>regionally significant</u> <del>highly versatile</del> soils, unless:</p> <p>i. The land adjoins an existing urban area and there is no other land suitable for urban expansion <u>, or there is a shortage of land available for urban development</u>; and</p> <p>ii. <del>There highly versatile soils are needed for urban expansion,</del> any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and</p> <p>iii. reverse sensitivity effects on rural productive activities can be <u>satisfactorily</u> avoided; and</p> <p>c) Avoid unplanned demand for provision of</p>	<ul style="list-style-type: none"> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<u>public infrastructure investment</u> , including domestic water supply and waste disposal; and d) Avoid creating <u>significant competing demand for water</u> <del>or other resources</del> ."	
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk</u> <del>harm</del> human health or the quality of the environment <del>in Otago</del> ".	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend c) as follows: "c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and".	No reason given.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Amend a) as follows: "a) Prior to subdivision or development of potentially contaminated land, <del>requiring</del> <u>ensuring</u> a site investigation is undertaken to determine the nature or extent of any contamination; and"	No reason given.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Amend as follows: "Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably degrade natural values</u> ".	<ul style="list-style-type: none"> <li>• Avoiding the creation of new contaminated land may not always be appropriate or practical: in remediating contaminated land it may be appropriate to move soil to another location depending on where it is situated and how that land is to be used.</li> <li>• The emphasis should be on avoiding risks to human health or the environment.</li> </ul>
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	<ul style="list-style-type: none"> <li>• Add the following objective: "Significant industry activities and physical resources are provided for".</li> <li>• Add the following policy: "Recognising and providing for significant industry activities and physical resources Recognising and providing for significant industry activities and physical resources, by: a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety; b) Protecting significant industry activities from inappropriate subdivision, use, and development; c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated."</li> <li>• Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to: a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and</li> </ul>	Regionally Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				cultural well-being; b) Protect significant industry activities from inappropriate subdivision, use, and development; c) Enable significant industry activities and development that does not have a significant adverse effect on the environment; d) Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance."	
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Amend	Amend as follows: " <del>Sometimes, existing businesses may be placed at risk by pressure to change activities are susceptible to reverse sensitivity effects, particularly when land use changes to activities that may compete or conflict, creating reverse sensitivities.</del> "	No reason given.
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows: "Many natural and physical resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users."	No reason given.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend as follows: "Maintain and, <del>where possible,</del> enhance public access to the natural environment, including to the coast, lakes, rivers and their margins, and areas of cultural or historic significance, unless restricting access is necessary to: ... b) Protect the <del>natural heritage and ecosystem</del> values of sensitive natural areas or habitats; or..."	No reason given.
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: " <del>Significant h</del> Historic heritage resources are recognised and contribute to the region's character and sense of identity".	No reason given.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: " <del>Manage historic heritage values to p</del> Protect <del>and enhance</del> the values of places and areas of historic heritage <del>from inappropriate development</del> , by: ... c) Avoiding <del>, remedying or mitigating</del> adverse effects on those values which contribute to the area or place being of regional or national significance; and <del>d) Avoiding significant adverse effects on other values of areas and places of historic heritage; and</del> e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and f) Remediating, when adverse effects on other values cannot be avoided; and g) Mitigating when adverse effects on other values cannot be avoided or remediated; and h) ..."	<ul style="list-style-type: none"> <li>• The PRPS does not correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows: <del>"Managing for rural- Protecting regionally significant industry activities from inappropriate subdivision, use and development</del> Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling <u>regionally significant industry activities</u> , <del>farming and other rural activities that support the rural economy</del> ; and b) Minimising the loss of <u>regionally significant soils highly valued for their versatility for primary production</u> ; and c) Restricting the establishment of activities <del>in rural areas</del> that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u> ; and d) <del>Minimising- Restricting</del> the subdivision of productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and e) Providing for other activities that have a functional need to locate in rural areas <del>including tourism and recreational activities that are of a nature and scale compatible with rural activities</del> ."	<ul style="list-style-type: none"> <li>• Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.</li> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> </ul>
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Amend	Amend as follows: <del>"Recognising and providing for the values of Otago's central business districts</del> Recognise <u>and provide for</u> the values of Otago's central business districts, including as the primary focal point for social, cultural and economic activities within a community."	No reason given.
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	Amend as follows: "Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of <del>the Otago's</del> central business districts and support local commercial needs, by: a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and ... c) Avoiding unplanned extension of commercial activities that has significant adverse effects on <del>the a</del> central business district, including on the efficient use of infrastructure, employment and services; and ..."	No reason given.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	Amend as follows: "Manage the finite nature of land suitable and available for industrial activities, by: a) Providing specific areas to accommodate <del>the effects of</del> industrial activities; and b) Providing a range of land suitable for different industrial activities <del>including land extensive activities</del> ; and c) Restricting the establishment of activities in	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				industrial areas that may result in: i. Reverse sensitivity effects <u>on industrial activities</u> ; or ii. Inefficient use of industrial land or infrastructure."	
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend as follows: "Managing locational needs for mineral and gas exploration, extraction and processing Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Giving preference to avoiding their location in</del> <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> : i. ... b) Restricting the establishment of <del>these</del> activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities</u> ."	No reason given.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in</del> : ... e) <u>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and,</u> ... g) Considering the use of offsetting, or compensatory measures, <u>to address</u> <del>for</del> residual adverse effects <u>on the environment</u> ; and ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values <del>only</del> when: a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and b) Those <u>adverse</u> effects cannot be avoided, remedied or mitigated; and c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."	<ul style="list-style-type: none"> <li>• The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection.</li> <li>• Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Amend as follows: " <u>Providing for</u> <del>o</del> Offsetting <del>for</del> <u>from adverse effects on</u> indigenous biodiversity Provide for offsetting <del>for</del> <u>from adverse effects on indigenous biodiversity, when</u> <del>it is enabled,</del>	No reason given.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				by ensuring that: a) The offset achieves no net loss <del>and preferably a net gain</del> in indigenous biodiversity values; and b) The offset is undertaken close to the location of development <del>, where this will result in the best ecological outcome; and...</del>	
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	Add the following method: "1.1.4 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."	No reason given.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<ul style="list-style-type: none"> <li>Amend Method 1.2.1 as follows: "Identify <del>and protect from inappropriate subdivision, use and development,</del> places, areas or landscapes of cultural, spiritual or traditional significance to them;".</li> <li>Amend Method 1.2.2 as follows: "Identify, and protect <del>from inappropriate subdivision, use and development,</del> the values that contribute to their significance;".</li> <li>Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</li> </ul>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Oppose	Delete Method 1.4.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Oppose	Delete Method 2.2	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Oppose	Delete Method 2.3.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting <del>from inappropriate subdivision, use and development,</del> historic heritage places <del>or</del> areas <del>or</del> landscapes located in the beds of rivers, lakes and wetlands or the coastal marine area;"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.12.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7.	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>Unnecessary or ambiguous ("may").</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend Method 4.2.1 as follows: "City or district councils will implement Policies 3.2.2 and 3.2.3 <u>to the extent applicable</u> when undertaking natural hazard assessments".	No reason given.
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend Method 6.1.2 as follows: "Regional, city and district councils, in their areas of responsibility, will identify: ... d) <del>Special amenity landscapes;</del> ... g) <u>Regionally significant soil resources;</u> h) <u>Significant infrastructure.</u> "	<ul style="list-style-type: none"> <li>Concerned about introducing the term of Special Amenity Landscapes.</li> <li>Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> <li>Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. Too high a level of protection could have adverse effects on the economic and social wellbeing of communities.</li> <li>Significant infrastructure should be defined, recognised and provided for.</li> </ul>
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Oppose	Delete Method 7.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
211	Method 8 - Education and Information	Method 8.1.1 - Information from regional, district and city councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
214	Method 8 - Education and Information	Method 8.1.4 - Information from city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
215	Method 9 - Funding	Method 9 - Funding	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
220	Method 11 - Advocacy and Facilitation	Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional	Oppose	Delete Methods.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Amend d) as follows: "d) Facilitate coordination between <del>lifeline utilities</del> <u>significant infrastructure and significant community facilities used</u> for emergency management, including by: i) Recognising the interconnections between <u>significant infrastructure</u> <del>lifeline utilities</del> ..."	No reason given.
225	Method 11 - Advocacy and	Method 11.2.3 - Facilitation by	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	Facilitation	regional, city and district councils - optional			<ul style="list-style-type: none"> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
248	Appendices	Appendices - general	Oppose	<ul style="list-style-type: none"> <li>Delete Appendix 1.</li> <li>Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS.</li> </ul>	<ul style="list-style-type: none"> <li>Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and</li> <li>Is not required by RMA S62 or is not an active directive.</li> </ul>
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>Add the following definitions: <ul style="list-style-type: none"> <li>Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance;</li> <li>Significant Community Facility - include facilities that provide essential community services; <ul style="list-style-type: none"> <li>Urban;</li> <li>Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS;</li> <li>Regionally Significant Industry Activity - include any activity associated with tourism or primary production;</li> <li>Hard mitigation measures;</li> </ul> </li> <li>Amend definition of Kai Tahu to clarify if has the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning documents outside Otago.</li> </ul> </li> </ul>	To reduce ambiguity and enable more efficient implementation of the PRPS.
250	Glossaries	Glossary of Te Reo terms	Oppose	Delete and include these terms in the Glossary.	Unnecessary to have 2 separate glossaries.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	<ul style="list-style-type: none"> <li>Delete or amend text that: <ul style="list-style-type: none"> <li>Is duplicated;</li> <li>Is vague or ambiguous;</li> <li>Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation;</li> <li>Is not required by RMA S62 or is not an active directive; and</li> <li>Delete all "need" statements.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>"Need" statements are not required by RMA S62 or is not an active directive.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	<ul style="list-style-type: none"> <li>Any consequential or other amendments required to give effect, or like effect, to any matter raised in the submission.</li> </ul>	No reason given.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	<ul style="list-style-type: none"> <li>Retention of all provisions as notified, except as requested in the submission.</li> </ul>	No reason given.
6	Overall approach	Schedule 3 - Significance threshold	Oppose	<ul style="list-style-type: none"> <li>Delete; or</li> <li>Amend so it is consistent with case law and insert new criteria to reflect the need to consider offsetting or compensation and to reflect environmental/planning context on a case-by-case basis, e.g.: <ul style="list-style-type: none"> <li>"11. Ability for offsetting or compensation: The extent to which the adverse effect can be</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>The S32 report does not evaluate Schedule 3.</li> <li>Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant.</li> <li>Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>directly offset or otherwise compensated, and consequently reducing the significance of the effect.</p> <ul style="list-style-type: none"> <li>• 12. Environmental Context: The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</li> <li>• 13. Matters of national importance and national significance: The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA. The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS." </li></ul>	
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Amend	Amend as follows: "The principles of Te Tiriti o Waitangi are <u>identified and</u> taken into account in resource management decisions".	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	<p>Amend as follows: "Policy 1.1.2 <u>Identifying and</u> <del>Faking</del> the principles of Te Tiriti o Waitangi into account</p> <p>Ensure that local authorities <del>exercise their functions and powers, to</del> <u>take into account the principles of Te Tiriti o Waitangi identified in Appendix 1A by:</u></p> <ul style="list-style-type: none"> <li>a) <u>Providing</u> <del>Accord</del> Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,</li> <li>b) <del>Involve</del> <u>Involving</u> Kai Tahu in resource management decision-making processes and implementation; and</li> <li>c) <del>Take</del> <u>Taking</u> into account Kai Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taoka ; and</li> <li>d) <del>Ensure</del> <u>Ensuring</u> Kai Tahu have the prerogative to: <ul style="list-style-type: none"> <li>i. <del>Identify</del> <u>Identifying</u> their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and</li> <li>ii. <del>Determine</del> <u>Determining</u> how best to express that relationship; and</li> </ul> </li> <li>e) <del>Ensure</del> <u>Ensuring</u> Kai Tahu are able to exercise kaitiakitaka; and</li> <li>f) <del>Ensure</del> <u>Ensuring</u> that district and regional plans: <ul style="list-style-type: none"> <li>i. <del>Give</del> <u>Giving</u> effect to the Ngai Tahu Claims Settlement Act 1998; and</li> <li>ii. <del>Recognise</del> <u>Recognising</u> and <del>provide</del> <u>providing</u> for statutory acknowledgement areas, as detailed in Schedule 2; and</li> <li>iii. <del>Provide</del> <u>Providing</u> for other areas in</li> </ul> </li> </ul>	Use wording of RMA Part 2.

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				Otago that are recognised as significant to Kai Tahu in a manner similar to that prescribed for statutory acknowledgement areas."	
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Objective 1.2 Kai Tahu values, rights and interests and customary resources are <u>identified and sustained</u> ."	No reason given.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) Ensuring <u>sustainable management of</u> resources supports <del>their</del> customary uses and cultural values (as detailed in Schedules 1A and B); and"	No reason given.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> on those values and sites <del>as detailed in Schedule 3</del> ; and"	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<ul style="list-style-type: none"> <li>• Amend b) as follows: "b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and"</li> <li>• Delete c).</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Specify or identify "other cultural values" referred to in other parts of the RPS in Schedule 1A.	No reason given.
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	Amend Issue as follows: "Degradation of <u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time <del>will</del> <u>can</u> cause serious damage."	Regional issues include natural resource management issues.
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected <u>from inappropriate subdivision, use and development</u> ."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <del>Natural</del> <u>Environmental</u> systems <u>and resources</u> are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely affects the <u>environmental</u> value of another..."	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural <del>and physical</del> resources are recognised, <u>and protected from inappropriate subdivision, use and development</u> <del>maintained and enhanced</del> ."	<ul style="list-style-type: none"> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage	• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use

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				<p>freshwater, to:</p> <p>...</p> <p>c) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u>; and</p> <p>d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u>, unless detrimental to indigenous biodiversity; and</p> <p>...</p> <p>j) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u>; and</p> <p>k) Provide for other cultural values <u>as identified in Schedule 1A</u>; and</p> <p>l) Protect important recreation values <u>from inappropriate subdivision, use and development</u>; and</p> <p>..."</p>	<p>and development.</p> <ul style="list-style-type: none"> <li>• The PRPS should be focused on resource management issues of regional significance.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	<p>Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to:</p> <p>...</p> <p>b) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u>; and</p> <p>...</p> <p>g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u>; and</p> <p>h) Provide for other cultural values <u>as identified in Schedule 1A</u>; and..."</p>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	<p>Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to:</p> <p>...</p> <p>c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u>, unless detrimental to indigenous biodiversity; and</p> <p>...</p> <p>g) Provide for other cultural values <u>as identified in Schedule 1A</u>; and</p> <p>h) Protect important recreation values <u>from inappropriate subdivision, use and development</u>; and</p> <p>..."</p>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend b) as follows: "b)Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	<p>Amend as follows: "Recognise soil values <u>that are of a regional significance</u>, and manage <u>those</u> soils, to:</p> <p>...</p> <p>f) <del>Retain</del> <u>Ensure the primary use of regionally significant soil resources <u>is</u> for primary production <u>purposes</u></u>; and</p> <p>g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u>; and</p>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and ... k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u> ; and ..."	
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Amend c) iii. as follows: "iii. Historical <del>and heritage</del> associations".	No reason given.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• As applies to all landscape assessments, including for "Special Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Add the following new policy: "Managing cross boundary landscape effects <u>Promote alignment of District Plans and integrated assessments of environmental effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries.</u> "	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries, which would benefit from a regionally integrated approach.</li> <li>• This proposed policy would be as effective as the provisions on Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: " <del>Protect and enhance</del> <u>Manage subdivision, use and development that affects</u> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects <del>on these values which contribute</del> <u>which will result in</u> to the area or habitat <u>losing its</u> <del>being</del> significant <u>status</u> ; and b) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on other values of the area or habitat; and <del>c) Assessing the significance of adverse effects on these values, as detailed in Schedule 3; and</del> ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes <del>, using the attributes as detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• These attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• Schedule 4 should be deleted</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: " <del>Protect, enhance and restore</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding natural features, landscapes and	<ul style="list-style-type: none"> <li>• Could disrupt the balance of the values of outstanding natural landscapes and features and other important values.</li> <li>• For example, ski fields are appropriate to locate in alpine environments that may be considered outstanding natural landscapes.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>seascapes, by:</p> <p>a) <del>Avoiding adverse effects on those values which contribute to which will result in the loss of the</del> significance of the natural feature, landscape or seascape; and</p> <p>...</p> <p><del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del></p> <p>...</p> <p><u>g) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values</u></p> <p><u>(h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate".</u></p>	<ul style="list-style-type: none"> <li>• Ensuring such businesses can continue to operate and provide an important recreational and economic resource to Otago should be borne in mind.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding, using the attributes detailed in Schedule 4."	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of different criteria being used in current or proposed district plans, and hence, creating inefficiencies and potentially slowing down forthcoming district plan reviews. These concerns also relation to Schedule 4.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social wellbeing of communities.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	<p>Amend as follows: "<del>Protect or enhance the values of: Manage</del> special amenity landscapes and highly valued natural features, by:</p> <p>a) <del>Avoiding, remedying or mitigating significant</del> adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and</p> <p><del>b) Avoiding, remedying or mitigating other adverse effects on other values; and</del></p> <p><del>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del></p> <p>...</p> <p><u>g) Recognising and providing for the use of such resources including as places where productive activities, tourism, recreation, infrastructure, homes and work places are located.</u></p> <p><u>h) Allowing values to adapt over time as communities and economies change."</u></p>	<ul style="list-style-type: none"> <li>• Level of protection not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it.</li> <li>• Better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category.</li> <li>• The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend as follows: "Preserve or enhance the natural character values of the coastal environment, by: <p>a) <u>Avoiding adverse effects of activities on natural character in areas of the coastal</u></p>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><del>environment with</del> <del>on those values which contribute to the</del> outstanding natural character of an area; and</p> <p>b) Avoiding significant adverse effects <u>and avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment</u> <del>on those values which contribute to the high natural character values of an area; and</del></p> <p>c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del></p> <p>d) <del>Avoiding, remedying or mitigating other adverse effects on other values; and...</del>"</p>	
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	<p>Amend as follows: "<del>Protect</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding water bodies and wetlands by:</p> <p>a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> , including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and</p> <p>...</p> <p><del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> ..."</p>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	<p>Amend as follows:</p> <p>"Policy 2.2.14 Identifying <del>highly valued regionally significant</del> soil resources</p> <p>Identify areas and values of <del>highly valued regionally significant</del> soil resources, using the following criteria:</p> <p>..."</p>	No reason given.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	<p>Amend as follows:</p> <p>"Policy 2.2.15 Managing <del>highly valued regionally significant</del> soil resources</p> <p>Protect the values of <del>areas of highly valued regionally significant</del> soil resources, by:</p> <p>a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on those values which contribute to the soil being <del>highly valued</del> <u>regionally significant</u>; and</p> <p>...</p> <p><del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del></p> <p>d) Recognising that <u>loss of regionally significant soils to urban expansion development</u> may be appropriate <u>near</u> <del>due to location and proximity to</del> existing urban development <del>and infrastructure</del> <u>particularly when there is a lack of supply of land available for urban development</u>."</p>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend as follows: " <del>Natural resource s</del> Systems and their interdependencies are recognised"	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Add the following policy: " <u>Applying an integrated management approach for significant infrastructure and activities that affect significant infrastructure</u> <u>Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure, by:</u> a) <u>Promoting consistent corridor management throughout the region.</u> "	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>Amend a) as follows: "a) Taking into account the impacts of management of one resource on the <u>environmental</u> values of another, or on the environment in general; and"</li> <li>Add the following clauses: "<u>c) Ensuring that resource objectives are complementary across administrative boundaries; and</u> <u>d) Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete policy.	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
66	Objectives on resilience, health and safety	Issue 3.1 - Risk of overreaching the environment's carrying capacity	Amend	Amend as follows: " <u>Activities that utilise resources -are undertaken-</u> without regard to their <u>local- environmental values -are at greater risk inappropriately compromising -of overreaching that- the</u> environment's ability to sustain the activity."	No reason given.
70	Objectives on resilience, health and safety	Issue 3.5 - Importance of infrastructure of regional or national significance	Amend	Amend as follows: " <u>It is important to recognise and provide for Significant Infrastructure -of regional and national significance- even though it may result in -local- adverse environmental effects -impacts, or adversely affect other nationally important values-...</u> "	Significant infrastructure should be defined, recognised and provided for.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Protection, <u>subdivision,</u> use and development of <u>natural and physical</u> resources recognises environmental constraints".	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising <u>natural and physical</u> environmental constraints Recognise the <u>natural and physical</u> environmental constraints of <u>resources -an area-</u> , the <u>environmental</u> effects of those constraints on activities <u>utilising those resources,</u> and the <u>environmental</u> effects of those activities on those constraints, <u>including with particular recognition of :</u> ... c) The sensitivity of <u>the natural and physical</u> resources to adverse effects from the proposed	No reason given.

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				activity/land use; and ..."	
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Amend Objective 3.2 as follows: " <del>Inappropriate</del> risk that natural hazards pose to Otago's communities are minimised"	Designing to a 100 year level may be appropriate, but it would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities <del>including hazards of low likelihood and high consequence.</del> "	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows: "Manage natural hazard risk, <del>including</del> with <u>particular</u> regard to: a) The risk <del>they</del> posed, considering the likelihood and consequences of natural hazard events; and ..."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend 1st sentence as follows: "Assess activities <u>in areas known to be subject to an identified</u> , <del>for</del> natural hazard risk, by considering:..."	No reason given.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Policy 3.2.6 Avoiding increased natural hazard risk <u>from inappropriate subdivision, use and development</u> Avoid <u>remedy or mitigate increased increasing</u> natural hazard risk <u>from inappropriate subdivision, use and development</u> , including by:..."	<ul style="list-style-type: none"> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• It would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).</li> </ul>
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend 1st sentence as follows: "Reduce existing natural hazard risk, <del>including particularly</del> by:"	No reason given.
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) There is significant <del>public or environmental</del> benefit in doing so; or b) The work relates to the functioning ability of <u>significant infrastructure</u> , a <u>lifeline utility</u> , or facility <u>used</u> for essential or emergency services <u>or a significant community facility</u> ."	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ... b) Designing infrastructure to take into account: ... iv. <del>Natural and physical</del> Resource constraints; and v. Effects on the values of natural and physical resources; and ... c) Managing urban growth <u>in a coordinated manner to ensure</u> : i. <del>Within areas that have</del> sufficient infrastructure <u>services are provided</u> <del>capacity</del> ; or ii. <del>Where infrastructure services can be</del>	<ul style="list-style-type: none"> <li>• Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community costs than benefits in high growth areas.</li> <li>• Regulation of the release of land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				upgraded or extended efficiently and effectively ; and d) Co-ordinating the design and development of infrastructure with the staging of land use change, including with: i. Structural design and release of land for new urban development; or ii. Structural redesign and redevelopment within existing urban areas."	
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend as follows: "Manage infrastructure activities, to: ... b) <del>Reduce, Avoid, remedy or mitigate</del> adverse effects of those activities, including cumulative adverse effects on <del>natural and physical</del> resources; and c) Support economic, social and community <del>needs</del> activities; and d) Improve efficiency of use of <del>natural</del> resources; and e) Protect infrastructure corridors <u>from inappropriate subdivision, uses and development</u> <del>for infrastructure needs, now and for the future</del> ; and ... g) Protect the functioning of <u>significant infrastructure, lifeline utilities</u> and essential or emergency services."	Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend as follows: "Policy 3.4.3 Designing <del>lifeline utilities</del> <u>significant infrastructure</u> and facilities for essential or emergency services Design <del>lifeline utilities</del> <u>significant infrastructure</u> , and facilities for essential or emergency services, to:..."	No reason given.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, <del>lifeline utilities</del>, <u>significant infrastructure</u>, and essential and emergency services".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend as follows: " <u>Significant</u> Infrastructure <del>of national and regional significance</del> is <u>recognised and provided for</u> managed in a sustainable way."	Significant infrastructure should be defined, recognised and provided for.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend as follows: "Policy 3.5.1 <u>Recognising and providing for</u> national and regional significance of infrastructure Recognise <u>and provide for</u> the <del>national and regional</del> significance of the following infrastructure: a) Renewable electricity generation facilities <del>where they supply the national electricity grid and local distribution network</del> ; and ... f) Structures for transportation by rail <u>and</u>	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The PRPS does not give enough recognition of and provision for the tourism sector.</li> </ul>

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105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	<p>Amend as follows:</p> <p>"Policy 3.5.2 Managing adverse effects of <u>significant</u> infrastructure <del>that has national or regional significance</del> <u>Minimise</u> <del>Avoid, remedy or mitigate</del> adverse effects from <u>significant</u> infrastructure <del>that has national or regional significance</del>, by:</p> <p>a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in:</del></p> <p>...</p> <p>b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding</del> <u>minimising</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and</p> <p>...</p> <p>d) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del></p> <p>e) <del>Considering</del> <u>Enabling infrastructure providers to employ</u> the use of offsetting ; or other compensatory measures <u>to address</u> <del>for</del> residual adverse effects on <u>the environment indigenous biodiversity</u>."</p>	<ul style="list-style-type: none"> <li>• Significant infrastructure should be defined, recognised and provided for.</li> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<ul style="list-style-type: none"> <li>• Amend header as follows: "Protecting <u>significant</u> infrastructure <del>of national or regional significance</del>."</li> <li>• Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>• Significant infrastructure should be defined, recognised and provided for.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	<p>Amend as follows:</p> <p>"Policy 3.6.2 Promoting small <u>and community</u> scale renewable electricity generation</p> <p>Promote small <u>and community</u> scale renewable electricity generation activities that :</p> <p>a) <del>Increase the local community's resilience and security of energy supply; and</del></p> <p>b) <del>Avoid, remedy or mitigate adverse effects from that activity."</del></p>	No reason given.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	<ul style="list-style-type: none"> <li>• Amend 1st sentence as follows: "Protect the generation capacity of <u>nationally or regionally significant</u> renewable electricity generation activities, by..."</li> <li>• Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	<p>Amend as follows:</p> <ul style="list-style-type: none"> <li>• Delete d).</li> <li>• "e) Protecting <del>existing</del> distribution corridors for infrastructure needs, now and for the future."</li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	<p>Amend as follows: "Encourage the use of good urban design principles in subdivision and development in urban areas <del>, as detailed in Schedule 6</del>, to:</p>	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> </ul>

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				<p>...</p> <p>b) Ensure that the built form relates well to its <u>surrounding</u> <del>natural</del> environment, including by:</p> <p>i. <del>Reflecting natural features such as rivers, lakes, wetlands and topography;</del> and</p> <p>ii. <del>Providing for ecological corridors in urban areas;</del> and</p> <p>iii. <del>Protecting areas of indigenous biodiversity and habitat for indigenous fauna;</del> and</p> <p>iv. <del>Encouraging use of low impact design techniques;</del> and</p> <p>v. <del>Encouraging construction of warmer buildings</del> ; and</p> <p>..."</p>	<ul style="list-style-type: none"> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend a) as follows: "a) <del>Maximising</del> Optimising passive solar gain; and"	No reason given.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend as follows: "Design <u>and maintain</u> public spaces, including streets and open spaces, to <u>provide for a range of uses and</u> meeting the reasonable access and mobility needs of all sectors within the community, <del>including the young and those with mobility impairments.</del> "	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	<p>Amend as follows:</p> <p>"Policy 3.8.1 <del>Managing</del> <u>Providing</u> for urban growth <del>Manage</del> <u>Provide for</u> urban growth and creation of new urban land in a strategic and co-ordinated way, by:</p> <p>a) <u>Understanding demand and supply of</u> <del>Ensuring there is sufficient</del> residential, commercial and industrial <u>zoned</u> land capacity, <del>to</del> <u>and catering for that</u> demand <del>for such land, projected over at least the next 10 years;</del> and</p> <p>b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to:</p> <p>i. Provide infrastructure in an efficient and effective way; and</p> <p>ii. <del>Avoid</del> <u>Discouraging</u> additional costs <u>on the public</u> that arise from unplanned infrastructure expansion; and</p> <p>c) Identifying future growth areas that:</p> <p>i. Minimise <u>significant</u> adverse effects on <del>rural the</del> <u>productivity of the rural and tourism</u> sectors, <del>including loss of highly valued soils or creating competing urban demand for water and other resources;</del> and</p> <p>ii. <u>Can be developed without resulting in significant adverse effects on any matter of</u></p>	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community.</li> <li>• Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS.</li> <li>• "Considering the need for urban growth boundaries" should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential methods.</li> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><del>national importance or national significance</del>  <del>Maintain or enhance significant biodiversity, landscape or natural character values; and</del>  <del>iii. Maintain important cultural or heritage values; and</del>  <del>iv- iii. Avoid land with significant risk from natural hazards which cannot be remedied or mitigated; and</del>  d) Considering the need for urban growth boundaries to control <del>potentially inappropriate</del> urban expansion; and  e) Ensuring efficient use of land; and  f) Requiring the use of low or no-emission heating systems in buildings, <del>when</del> <u>where</u> ambient air quality <del>in or near the growth area</del> is:  i. Below standards for human health; or  ii. Vulnerable to degradation given the local climatic and geographical context; and  g) Giving effect to the principles of good urban design <del>as detailed in Schedule 6;</del> and  h) Giving effect to the principles of crime prevention through environmental design</p>	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	Delete the policy.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS:</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend as follows: "Manage subdivision, use and development of rural land, to: a) Avoid <u>inappropriate</u> development or fragmentation of land <u>particularly</u> which undermines or forecloses the potential of rural land: i. For primary production <u>or tourism</u> ; or ... b) Have particular regard to whether the proposal will result in a loss of the productive potential of <u>regionally significant</u> <del>highly versatile</del> soils, unless: i. The land adjoins an existing urban area and there is no other land suitable for urban expansion <u>, or there is a shortage of land available for urban development</u> ; and ii. <del>There highly versatile soils are needed for urban expansion</del> any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and iii. reverse sensitivity effects on rural productive activities can be <u>satisfactorily</u> avoided; and c) Avoid unplanned demand for provision of <u>public infrastructure investment</u> , including domestic water supply and waste disposal; and d) Avoid creating <u>significant</u> competing demand for water <del>or other</del> resources."	<ul style="list-style-type: none"> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk</u> <del>harm</del> human health or the quality of the environment <del>in Otago</del> ".	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend c) as follows: "c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and".	No reason given.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Amend a) as follows: "a) Prior to subdivision or development of potentially contaminated land, <u>requiring</u> <del>ensuring</del> a site investigation is undertaken to determine the nature or extent of any contamination; and"	No reason given.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Amend as follows: "Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably degrade natural values</u> ".	<ul style="list-style-type: none"> <li>• Avoiding the creation of new contaminated land may not always be appropriate or practical: in remediating contaminated land it may be appropriate to move soil to another location depending on where it is situated and how that land is to be used.</li> <li>• The emphasis should be on avoiding risks to human health or the environment.</li> </ul>
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	<ul style="list-style-type: none"> <li>• Add the following objective: "Significant industry activities and physical resources are provided for".</li> </ul>	Regionally Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Add the following policy: "Recognising and providing for significant industry activities and physical resources Recognising and providing for significant industry activities and physical resources, by: a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety; b) Protecting significant industry activities from inappropriate subdivision, use, and development; c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated."</li> <li>• Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to: a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and cultural well-being; b) Protect significant industry activities from inappropriate subdivision, use, and development; c) Enable significant industry activities and development that does not have a significant adverse effect on the environment; d) Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance."</li> </ul>	
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Amend	Amend as follows: " <del>Sometimes, e</del> Existing businesses may be placed at risk by pressure to change - activities are susceptible to reverse sensitivity effects, particularly when land use changes - to activities that may compete or conflict, creating reverse sensitivities."	No reason given.
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows: "Many <del>natural and physical</del> resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users."	No reason given.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend as follows: "Maintain and <del>where possible,</del> enhance public access to the natural environment, including to the coast, lakes, rivers and their margins, and areas of cultural or historic significance, unless restricting access is necessary to:	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				... b) Protect the <del>natural heritage and ecosystem</del> values of sensitive natural areas or habitats; or..."	
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: " <u>Significant h</u> Historic heritage resources are recognised and contribute to the region's character and sense of identity".	No reason given.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: " <u>Manage historic heritage values to p</u> Protect <del>and enhance</del> the values of places and areas of historic heritage <u>from inappropriate development</u> , by: ... c) Avoiding <u>, remedying or mitigating</u> adverse effects on those values which contribute to the area or place being of regional or national significance; and <del>d) Avoiding significant adverse effects on other values of areas and places of historic heritage; and</del> e) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> f) <del>Remediating, when adverse effects on other values cannot be avoided; and</del> g) <del>Mitigating when adverse effects on other values cannot be avoided or remediated; and</del> h) ..."	<ul style="list-style-type: none"> <li>• The PRPS does not correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows: " <del>Managing for rural</del> <u>Protecting regionally significant industry activities from inappropriate subdivision, use and development</u> Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling <u>regionally significant industry activities</u> , <del>farming and other rural activities that support the rural economy</del> ; and b) Minimising the loss of <u>regionally significant soils</u> <del>highly valued for their versatility for primary production</del> ; and c) Restricting the establishment of activities <del>in rural areas</del> that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u> ; and d) <del>Minimising</del> <u>Restricting</u> the subdivision of productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and e) Providing for other activities that have a functional need to locate in rural areas <del>including tourism and recreational activities that are of a nature and scale compatible with rural activities.</del> "	<ul style="list-style-type: none"> <li>• Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.</li> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> </ul>
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Amend	Amend as follows: "Recognising <u>and providing for</u> the values of Otago's central business districts Recognise <u>and provide for</u> the values of	No reason given.

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				Otago's central business districts, including as the primary focal point for social, cultural and economic activities within a community."	
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	Amend as follows: "Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of <del>the</del> <u>Otago's</u> central business districts and support local commercial needs, by: a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and ... c) Avoiding unplanned extension of commercial activities that has significant adverse effects on <del>the</del> <u>a</u> central business district, including on the efficient use of infrastructure, employment and services; and ..."	No reason given.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	Amend as follows: "Manage the finite nature of land suitable and available for industrial activities, by: a) Providing specific areas to accommodate <del>the effects of</del> industrial activities; and b) Providing a range of land suitable for different industrial activities <del>, including land extensive activities</del> ; and c) Restricting the establishment of activities in industrial areas that may result in: i. Reverse sensitivity effects <u>on industrial activities</u> ; or ii. Inefficient use of industrial land or infrastructure."	No reason given.
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend as follows: "Managing locational needs for mineral and gas exploration, extraction and processing Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Giving preference to avoiding their location in</del> <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> : i. ... b) Restricting the establishment of <del>these</del> activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities</u> ."	No reason given.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in</u>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>significant adverse effect on <del>Giving preference to avoiding their location in:</del></p> <p>...</p> <p><del>e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and,</del></p> <p>...</p> <p>g) Considering the use of offsetting, or compensatory measures, <del>to address</del> <u>for</u> residual adverse effects <u>on the environment</u>; and</p> <p>..."</p>	
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	<p>Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values <del>only</del> when:</p> <p>a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and</p> <p>b) Those <u>adverse</u> effects cannot be avoided, remedied or mitigated; and</p> <p>c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."</p>	<ul style="list-style-type: none"> <li>The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection.</li> <li>Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	<p>Amend as follows:</p> <p><del>"Providing for o</del>Offsetting <del>for</del> <u>from adverse effects on</u> indigenous biodiversity</p> <p>Provide for offsetting <del>for</del> <u>from adverse effects</u> on indigenous biodiversity, when <del>it is enabled,</del> <u>by ensuring that:</u></p> <p>a) The offset achieves no net loss <del>and preferably a net gain</del> in indigenous biodiversity values; and</p> <p>b) The offset is undertaken close to the location of development <del>, where this will result in the best ecological outcome; and...</del>"</p>	No reason given.
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	<p>Add the following method: "1.1.4 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</p>	No reason given.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<ul style="list-style-type: none"> <li>Amend Method 1.2.1 as follows: "Identify <del>and protect</del> <u>from inappropriate subdivision, use and development</u>, places, areas or landscapes of cultural, spiritual or traditional significance to them;"</li> <li>Amend Method 1.2.2 as follows: "Identify, and protect <u>from inappropriate subdivision, use and development</u>, the values that contribute to their significance;"</li> <li>Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</li> </ul>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Oppose	Delete Method 1.4.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
186	Method 2 - Regional, City and	Method 2.2 - Establishing	Oppose	Delete Method 2.2	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	District Council Relationships	processes to address cross-boundary issues			<ul style="list-style-type: none"> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Oppose	Delete Method 2.3.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting <u>from inappropriate subdivision, use and development</u> , historic heritage places <u>or</u> areas <u>or</u> landscapes located in the beds of rivers, lakes and wetlands or the coastal marine area;"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.12.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7.	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>Unnecessary or ambiguous ("may").</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend Method 4.2.1 as follows: "City or district councils will implement Policies 3.2.2 and 3.2.3 <u>to the extent applicable</u> when undertaking natural hazard assessments".	No reason given.
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend Method 6.1.2 as follows: "Regional, city and district councils, in their areas of responsibility, will identify: ... -d) Special amenity landscapes; ..."	<ul style="list-style-type: none"> <li>Concerned about introducing the term of Special Amenity Landscapes.</li> <li>Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> <li>Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. Too high a level of</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<u>g) Regionally significant soil resources;</u> <u>h) Significant infrastructure.</u> "	protection could have adverse effects on the economic and social wellbeing of communities. • Significant infrastructure should be defined, recognised and provided for.
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Oppose	Delete Method 7.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
211	Method 8 - Education and Information	Method 8.1.1 - Information from regional, district and city councils - optional	Oppose	Delete Method.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
214	Method 8 - Education and Information	Method 8.1.4 - Information from city and district councils - optional	Oppose	Delete Method.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
215	Method 9 - Funding	Method 9 - Funding	Oppose	Delete Method.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
220	Method 11 - Advocacy and Facilitation	Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional	Oppose	Delete Methods.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Amend d) as follows: "d) Facilitate coordination between <del>lifeline utilities - significant infrastructure and significant community facilities used</del> for emergency management, including by: i) Recognising the interconnections between significant infrastructure <del>lifeline utilities</del> ..."	No reason given.
225	Method 11 - Advocacy and Facilitation	Method 11.2.3 - Facilitation by regional, city and district councils - optional	Oppose	Delete Method.	• Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
248	Appendices	Appendices - general	Oppose	• Delete Appendix 1. • Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS.	• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and • Is not required by RMA S62 or is not an active directive.
249	Glossaries	Glossary	Amend	• Add the following definitions: • Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance; • Significant Community Facility - include facilities that provide essential community services; • Urban; • Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS; • Regionally Significant Industry Activity - include any activity associated with tourism or primary production; • Hard mitigation measures; • Amend definition of Kai Tahu to clarify if has the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning documents outside Otago.	To reduce ambiguity and enable more efficient implementation of the PRPS.
250	Glossaries	Glossary of Te Reo terms	Oppose	Delete and include these terms in the Glossary.	Unnecessary to have 2 separate glossaries.

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256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Delete or amend text that: <ul style="list-style-type: none"> <li>• Is duplicated;</li> <li>• Is vague or ambiguous;</li> <li>• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation;</li> <li>• Is not required by RMA S62 or is not an active directive; and</li> <li>• Delete all "need" statements.</li> </ul>	<ul style="list-style-type: none"> <li>• Efficiency gains in removing unnecessary provisions.</li> <li>• Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>• "Need" statements are not required by RMA S62 or is not an active directive.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	<ul style="list-style-type: none"> <li>• Any consequential or other amendments required to give effect, or like effect, to any matter raised in the submission.</li> </ul>	No reason given.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	<ul style="list-style-type: none"> <li>• Retention of all provisions as notified, except as requested in the submission.</li> </ul>	No reason given.
6	Overall approach	Schedule 3 - Significance threshold	Oppose	<ul style="list-style-type: none"> <li>• Delete; or</li> <li>• Amend so it is consistent with case law and insert new criteria to reflect the need to consider offsetting or compensation and to reflect environmental/planning context on a case-by-case basis, e.g.: <ul style="list-style-type: none"> <li>• 11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly offset or otherwise compensated, and consequently reducing the significance of the effect.</li> <li>• 12. Environmental Context: The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</li> <li>• 13. Matters of national importance and national significance: The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA. The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS."</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• The S32 report does not evaluate Schedule 3.</li> <li>• Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant.</li> <li>• Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.</li> </ul>
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Amend	Amend as follows: "The principles of Te Tiriti o Waitangi are <u>identified and</u> taken into account in resource management decisions".	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	Amend as follows: "Policy 1.1.2 <u>Identifying and</u> taking the principles of Te Tiriti o Waitangi into account Ensure that local authorities <del>exercise their functions and powers, to</del> <u>take into account the principles of Te Tiriti o Waitangi identified in Appendix 1A by:</u> a) <u>Providing</u> Accord- Kai Tahu a status distinct from that of interest groups and members of the	Use wording of RMA Part 2.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				public, consistent with their position as a Treaty partner; and, b) <del>Involvement</del> <u>Involving</u> Kai Tahu in resource management decision-making processes and implementation; and c) <del>Take</del> <u>Taking</u> into account Kai Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taoka ; and d) <del>Ensure</del> <u>Ensuring</u> Kai Tahu have the prerogative to: i. <del>Identify</del> <u>Identifying</u> their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and ii. <del>Determine</del> <u>Determining</u> how best to express that relationship; and e) <del>Ensure</del> <u>Ensuring</u> Kai Tahu are able to exercise kaitiakitaka; and f) <del>Ensure</del> <u>Ensuring</u> that district and regional plans: i. <del>Give</del> <u>Giving</u> effect to the Ngai Tahu Claims Settlement Act 1998; and ii. <del>Recognise</del> <u>Recognising</u> and <del>provide</del> <u>providing</u> for statutory acknowledgement areas, as detailed in Schedule 2; and iii. <del>Provide</del> <u>Providing</u> for other areas in Otago that are recognised as significant to Kai Tahu in a manner similar to that prescribed for statutory acknowledgement areas."	
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Objective 1.2 Kai Tahu values, rights and interests and customary resources are <u>identified and</u> sustained."	No reason given.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) Ensuring <u>sustainable management of</u> resources supports <del>their</del> customary uses and cultural values (as detailed in Schedules 1A and B); and"	No reason given.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> , on those values and sites <del>, as detailed in Schedule 3</del> ; and"	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• <u>Schedule 3 criteria are inadequate (see submission on Schedule 3).</u></li> </ul>
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<ul style="list-style-type: none"> <li>• Amend b) as follows: "b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and"</li> <li>• Delete c).</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• <u>Schedule 3 criteria are inadequate (see submission on Schedule 3).</u></li> </ul>
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Specify or identify "other cultural values" referred to in other parts of the RPS in Schedule 1A.	No reason given.
25	Objectives on high quality natural	Issue 2.1 - Degradation of	Amend	Amend Issue as follows: "Degradation of	Regional issues include natural resource management issues.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	resources	Otago's natural resources		<u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time <del>will</del> <u>can</u> cause serious damage."	
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected <u>from inappropriate subdivision, use and development</u> ."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <del>Natural</del> <u>Environmental</u> systems <u>and resources</u> are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely affects the <u>environmental</u> value of another..."	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural <del>and physical</del> resources are recognised, <u>and protected from inappropriate subdivision, use and development</u> , <del>maintained and enhanced</del> ."	<ul style="list-style-type: none"> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to: ... c) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... j) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and k) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and l) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ... b) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and ... g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.

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				h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and..."	
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... g) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and h) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend b) as follows: "b)Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those soils</u> , to: ... f) <del>Retain</del> Ensure the primary use of regionally significant soil resources <u>is</u> for primary production <u>purposes</u> ; and g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and ... k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>The PRPS should be focused on resource management issues of regional significance.</li> <li>Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Amend c) iii. as follows: "iii. Historical <del>and heritage</del> associations".	No reason given.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>As applies to all landscape assessments, including for "Special Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued	Amend	Add the following new policy: "Managing cross boundary landscape effects	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries, which would benefit from a regionally integrated</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		natural resources		<u>Promote alignment of District Plans and integrated assessments of environmental effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries.</u> "	approach. <ul style="list-style-type: none"> <li>• This proposed policy would be as effective as the provisions on Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: " <u>Protect and enhance Manage subdivision, use and development that affects</u> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects <del>on those values which contribute</del> <u>which will result in</u> to the area or habitat <del>losing its being</del> significant status ; and b) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on other values of the area or habitat; and <del>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and ..."</del>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes <del>, using the attributes as detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• These attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• Schedule 4 should be deleted</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: " <u>Protect, enhance and restore Manage subdivision, use and development that affects</u> the values of outstanding natural features, landscapes and seascapes, by: a) Avoiding adverse effects <del>on those values which contribute to</del> <u>which will result in</u> the <del>loss of the</del> significance of the natural feature, landscape or seascape; and ... <del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and ...</del> <u>g) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values</u> <u>(h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate</u> ".	<ul style="list-style-type: none"> <li>• Could disrupt the balance of the values of outstanding natural landscapes and features and other important values.</li> <li>• For example, ski fields are appropriate to locate in alpine environments that may be considered outstanding natural landscapes.</li> <li>• Ensuring such businesses can continue to operate and provide an important recreational and economic resource to Otago should be borne in mind.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding <del>, using the attributes detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of different criteria being used in current or proposed district plans, and hence, creating inefficiencies and potentially slowing down forthcoming district plan reviews. These concerns also relation to Schedule 4.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social wellbeing of communities.
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Amend as follows: " <del>Protect or enhance the values of. <u>Manage</u> special amenity landscapes and highly valued natural features, by:</del> a) <del>Avoiding, <u>remedying or mitigating</u> significant</del> adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and and <del>b) <u>Avoiding, remedying or mitigating other adverse effects on other values;</u> and</del> c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> ... <u>g) Recognising and providing for the use of such resources including as places where productive activities, tourism, recreation, infrastructure, homes and work places are located.</u> h) <u>Allowing values to adapt over time as communities and economies change.</u> "	<ul style="list-style-type: none"> <li>• Level of protection not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it.</li> <li>• Better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category.</li> <li>• The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend as follows: "Preserve or enhance the natural character values of the coastal environment, by: a) <del>Avoiding adverse effects of activities on natural character in areas of the coastal environment with</del> <u>on those values which contribute to the</u> outstanding natural character of an area; and b) <del>Avoiding significant adverse effects <u>and avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment</u></del> <u>on those values which contribute to the high natural character values of an area; and</u> c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> d) <del>Avoiding, remedying or mitigating other adverse effects on other values; and...</del> "	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend as follows: " <del>Protect</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding water bodies and wetlands by: a) <del>Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u></del> , including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and and ... <del>c) <u>Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</u></del> ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	Amend as follows: "Policy 2.2.14 Identifying <del>highly valued</del>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<del>regionally significant</del> soil resources Identify areas and values of <del>highly valued</del> <del>regionally significant</del> soil resources, using the following criteria: ... "	
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Amend as follows: "Policy 2.2.15 Managing <del>highly valued</del> <del>regionally significant</del> soil resources Protect the values of <del>areas of highly valued</del> <del>regionally significant</del> soil resources, by: a) Avoiding significant adverse effects <del>from</del> <del>inappropriate subdivision, use and development</del> on those values which contribute to the soil being <del>highly valued</del> <del>regionally significant</del> ; and ... <del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> d) Recognising that <del>loss of regionally significant soils to urban expansion development</del> may be appropriate <del>near</del> <del>due to location and proximity to existing urban development and infrastructure</del> <del>particularly when there is a lack of supply of land available for urban development</del> ."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend as follows: " <del>Natural resource s</del> Systems and their interdependencies are recognised"	No reason given.
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Add the following policy: " <u>Applying an integrated management approach for significant infrastructure and activities that affect significant infrastructure</u> <u>Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure, by:</u> a) <u>Promoting consistent corridor management throughout the region.</u> "	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>• Amend a) as follows: "a) Taking into account the impacts of management of one resource on the <u>environmental</u> values of another, or on the environment in general; and"</li> <li>• Add the following clauses: " <u>c) Ensuring that resource objectives are complementary across administrative boundaries; and</u> <u>d) Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete policy.	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
66	Objectives on resilience, health	Issue 3.1 - Risk of overreaching	Amend	Amend as follows: "Activities that <u>utilise</u>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	and safety	the environment's carrying capacity		<del>resources</del> -are undertaken- without regard to their local- environmental values. -are at greater risk inappropriately compromising -of overreaching that- the environment's ability to sustain the activity."	
70	Objectives on resilience, health and safety	Issue 3.5 - Importance of infrastructure of regional or national significance	Amend	Amend as follows: " <u>It is important to recognise and provide for Significant Infrastructure</u> -of regional and national significance- <u>even though it</u> may result in local- adverse environmental effects -impacts, or adversely affect other nationally important values..."	Significant infrastructure should be defined, recognised and provided for.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of -natural and physical resources recognises environmental constraints".	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising <del>natural and physical</del> environmental constraints Recognise the <del>natural and physical</del> environmental constraints of <u>resources</u> -an area-, the <u>environmental</u> effects of those constraints on activities <u>utilising those resources</u> , and the <u>environmental</u> effects of those activities on those constraints, <del>including with particular recognition of</del> : ... c) The sensitivity of <del>the natural and physical</del> resources to adverse effects from the proposed activity/land use; and ..."	No reason given.
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Amend Objective 3.2 as follows: " <u>Inappropriate</u> risk that natural hazards pose to Otago's communities are minimised"	Designing to a 100 year level may be appropriate, but it would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities <del>including hazards of low likelihood and high consequence</del> ."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows: "Manage natural hazard risk, <del>including</del> with <u>particular</u> regard to: a) The risk <del>they</del> posed, considering the likelihood and consequences of natural hazard events; and ..."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend 1st sentence as follows: "Assess activities <u>in areas known to be subject to an identified</u> <del>for</del> natural hazard risk, by considering:..."	No reason given.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Policy 3.2.6 Avoiding increased natural hazard risk <u>from inappropriate subdivision, use and development</u> Avoid <u>remedy or mitigate increased</u> <del>increasing</del> natural hazard risk <u>from inappropriate subdivision, use and development</u> , including by:..."	<ul style="list-style-type: none"> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• It would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend 1st sentence as follows: "Reduce existing natural hazard risk, <del>including particularly</del> by:".	No reason given.
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) There is significant <del>public or environmental</del> benefit in doing so; or b) The work relates to the functioning ability of <u>significant infrastructure, a lifeline utility, or facility used for essential or emergency services</u> <del>or a significant community facility</del> ."	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ... b) Designing infrastructure to take into account: ... iv. <del>Natural and physical</del> Resource constraints; and v. Effects on the values of natural and physical resources; and ... c) Managing urban growth <u>in a coordinated manner to ensure</u> : i. <del>Within areas that have</del> sufficient infrastructure <u>services are provided</u> <del>capacity</del> ; or ii. <del>Where infrastructure services can be upgraded or extended</del> efficiently and effectively ; and d) <del>Co-ordinating the design and development of infrastructure with the staging of land use change, including with:</del> i. <del>Structural design and release of land for new urban development;</del> or ii. <del>Structural redesign and redevelopment within existing urban areas</del> ."	<ul style="list-style-type: none"> <li>• Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community costs than benefits in high growth areas.</li> <li>• Regulation of the release of land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend as follows: "Manage infrastructure activities, to: ... b) <del>Reduce</del> <u>Avoid, remedy or mitigate</u> adverse effects of those activities, including cumulative adverse effects on <del>natural and physical</del> resources; and c) Support economic, social and community <u>needs</u> <del>activities</del> ; and d) Improve efficiency of use of <del>natural</del> resources; and e) Protect infrastructure corridors <u>from inappropriate subdivision, uses and development</u> <del>for infrastructure needs, now and for the future</del> ; and ... g) Protect the functioning of <u>significant infrastructure, lifeline utilities</u> <del>and essential or emergency services</del> ."	Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend as follows: "Policy 3.4.3 Designing <del>lifeline utilities</del> <u>significant infrastructure</u> and facilities for essential or emergency services Design <del>lifeline utilities</del> <u>significant infrastructure</u> , and facilities for essential or emergency services, to:..."	No reason given.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, <del>lifeline utilities</del> , <u>significant infrastructure</u> , and essential and emergency services".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend as follows: " <u>Significant</u> Infrastructure of national and regional significance is <u>recognised and provided for</u> managed in a sustainable way."	Significant infrastructure should be defined, recognised and provided for.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend as follows: "Policy 3.5.1 Recognising <u>and providing for</u> national and regional- significance of infrastructure Recognise <u>and provide for</u> the national and regional- significance of the following infrastructure: a) Renewable electricity generation facilities ; where they supply the national electricity grid and local distribution network; and ... f) Structures for transportation by rail <u>and tourism activities</u> ."	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The PRPS does not give enough recognition of and provision for the tourism sector.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend as follows: "Policy 3.5.2 Managing adverse effects of <u>significant</u> infrastructure <del>that has national or regional significance</del> <del>Minimise</del> <u>Avoid, remedy or mitigate</u> adverse effects from <u>significant</u> infrastructure <del>that has national or regional significance</del> , by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in:</del> ... b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding</del> <u>minimising</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and ... d) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> e) <del>Considering</del> <u>Enabling infrastructure providers to employ</u> the use of offsetting ; or other compensatory measures <u>to address</u> ; for residual adverse effects on <u>the environment indigenous biodiversity</u> ."	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Protecting <u>significant</u> infrastructure <del>of national or regional significance</del>".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	<p>Amend as follows:</p> <p>"Policy 3.6.2 Promoting small <u>and community</u> scale renewable electricity generation</p> <p>Promote small <u>and community</u> scale renewable electricity generation activities that :</p> <p>a) <del>Increase the local community's resilience and security of energy supply; and</del></p> <p>b) <del>Avoid, remedy or mitigate adverse effects from that activity."</del></p>	No reason given.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	<ul style="list-style-type: none"> <li>Amend 1st sentence as follows: "Protect the generation capacity of <u>nationally or regionally significant</u> renewable electricity generation activities, by..."</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	<p>Amend as follows:</p> <ul style="list-style-type: none"> <li>Delete d).</li> <li>"e) Protecting <del>existing</del> distribution corridors for infrastructure needs, now and for the future."</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	<p>Amend as follows: "Encourage the use of good urban design principles in subdivision and development in urban areas <del>as detailed in Schedule 6</del>, to:</p> <p>...</p> <p>b) Ensure that the built form relates well to its <u>surrounding</u> <del>natural</del> environment <del>, including by:</del></p> <p>i. <del>Reflecting natural features such as rivers, lakes, wetlands and topography; and</del></p> <p>ii. <del>Providing for ecological corridors in urban areas; and</del></p> <p>iii. <del>Protecting areas of indigenous biodiversity and habitat for indigenous fauna; and</del></p> <p>iv. <del>Encouraging use of low impact design techniques; and</del></p> <p>v. <del>Encouraging construction of warmer buildings</del> ; and</p> <p>..."</p>	<ul style="list-style-type: none"> <li>Schedule 6 not assessed in S32 report.</li> <li>Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>May be to the detriment of good urban design for specific sites.</li> </ul>
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>Schedule 6 not assessed in S32 report.</li> <li>Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>May be to the detriment of good urban design for specific sites.</li> </ul>
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend a) as follows: "a) <del>Maximising</del> <u>Optimising</u> passive solar gain; and"	No reason given.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend as follows: "Design <u>and maintain</u> public spaces, including streets and open spaces, to <u>provide for a range of uses and</u> <del>meeting</del> the reasonable access and mobility needs of all sectors within the community <del>, including the young and those with mobility impairments."</del>	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("including").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	<p>Amend as follows:  <del>"Policy 3.8.1 - Managing -</del> <u>Providing</u> for urban growth  <del>-Manage- Provide for</del> urban growth and creation of new urban land in a strategic and co-ordinated way, by:</p> <p>a) <u>Understanding demand and supply of</u> <del>Ensuring there is sufficient</del> residential, commercial and industrial <u>zoned</u> land <del>capacity, to</del> <u>and catering for that demand for</u> such land, <del>projected over at least the next 10 years-</del>; and</p> <p>b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to:</p> <p>i. Provide infrastructure in an efficient and effective way; and</p> <p>ii. <del>Avoid - Discouraging</del> additional costs <u>on the public</u> that arise from unplanned infrastructure expansion; and</p> <p>c) Identifying future growth areas that:</p> <p>i. Minimise <u>significant</u> adverse effects on <del>rural the</del> <u>productivity of the rural and tourism sectors</u>, <del>-including loss of highly valued soils or creating competing urban demand for water and other resources-</del>; and</p> <p>ii. <u>Can be developed without resulting in significant adverse effects on any matter of national importance or national significance</u> <del>Maintain or enhance significant biodiversity, landscape or natural character values;</del> <u>and</u></p> <p>iii. <u>Maintain important cultural or heritage values;</u> <del>and</del></p> <p><del>iv-</del> <u>iii.</u> Avoid land with significant risk from natural hazards <u>which cannot be remedied or mitigated</u>; and</p> <p>d) Considering the need for urban growth boundaries to control <u>potentially inappropriate</u> urban expansion; and</p> <p>e) Ensuring efficient use of land; and</p> <p>f) Requiring the use of low or no-emission heating systems in buildings, <del>when</del> <u>where</u> ambient air quality <del>in or near the growth area</del> is:</p> <p>i. Below standards for human health; or</p> <p>ii. Vulnerable to degradation given the local climatic and geographical context; and</p> <p>g) Giving effect to the principles of good urban design <del>as detailed in Schedule 6;</del> and</p> <p>h) Giving effect to the principles of crime prevention through environmental design</p>	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community.</li> <li>• Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS.</li> <li>• "Considering the need for urban growth boundaries" should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential methods.</li> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	Delete the policy.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>become embroiled in urban growth management at a local level.</p> <ul style="list-style-type: none"> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<p>Amend as follows: "Manage subdivision, use and development of rural land, to:</p> <p>a) Avoid <u>inappropriate</u> development or fragmentation of land <u>, particularly</u> which undermines or forecloses the potential of rural land:</p> <p>i. For primary production <u>or tourism</u>; or</p> <p>...</p> <p>b) Have particular regard to whether the proposal will result in a loss of the productive potential of <u>regionally significant, highly versatile</u> soils, unless:</p> <p>i. The land adjoins an existing urban area and there is no other land suitable for urban expansion <u>, or there is a shortage of land available for urban development</u>; and</p> <p>ii. <del>There highly versatile soils are needed for urban expansion,</del> any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and</p> <p>iii. reverse sensitivity effects on rural productive activities can be <u>satisfactorily</u> avoided; and</p> <p>c) Avoid unplanned demand for provision of <u>public infrastructure investment</u>, including</p>	<ul style="list-style-type: none"> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				domestic water supply and waste disposal; and d) Avoid creating <u>significant</u> competing demand for water <del>or other</del> resources."	
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk</u> <del>harm</del> human health or the quality of the environment <del>in Otago</del> ".	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend c) as follows: "c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and".	No reason given.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Amend a) as follows: "a) Prior to subdivision or development of potentially contaminated land, <u>requiring</u> <del>ensuring</del> a site investigation is undertaken to determine the nature or extent of any contamination; and"	No reason given.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Amend as follows: "Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably degrade natural values</u> ".	<ul style="list-style-type: none"> <li>• Avoiding the creation of new contaminated land may not always be appropriate or practical: in remediating contaminated land it may be appropriate to move soil to another location depending on where it is situated and how that land is to be used.</li> <li>• The emphasis should be on avoiding risks to human health or the environment.</li> </ul>
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	<ul style="list-style-type: none"> <li>• Add the following objective: "Significant industry activities and physical resources are provided for".</li> <li>• Add the following policy: "Recognising and providing for significant industry activities and physical resources Recognising and providing for significant industry activities and physical resources, by: a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety; b) Protecting significant industry activities from inappropriate subdivision, use, and development; c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated."</li> <li>• Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to: a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and cultural well-being;</li> </ul>	Regionally Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				b) Protect significant industry activities from inappropriate subdivision, use, and development; c) Enable significant industry activities and development that does not have a significant adverse effect on the environment; d) Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance."	
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Amend	Amend as follows: " <del>Sometimes, e</del> Existing businesses may be placed at risk by pressure to change activities are susceptible to reverse sensitivity effects, particularly when land use changes to activities that may compete or conflict, creating reverse sensitivities."	No reason given.
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows: "Many <del>natural and physical</del> resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users."	No reason given.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend as follows: "Maintain and <del>where possible,</del> enhance public access to the natural environment, including to the coast, lakes, rivers and their margins, and areas of cultural or historic significance, unless restricting access is necessary to: ... b) Protect the <del>natural heritage and ecosystem</del> values of sensitive natural areas or habitats; or..."	No reason given.
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: " <del>Significant h</del> Historic heritage resources are recognised and contribute to the region's character and sense of identity".	No reason given.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: " <del>Manage historic heritage values to p</del> Protect and enhance the values of places and areas of historic heritage <del>from inappropriate development</del> , by: ... c) Avoiding <del>remedying or mitigating</del> adverse effects on those values which contribute to the area or place being of regional or national significance; and d) <del>Avoiding significant adverse effects on other values of areas and places of historic heritage;</del> and e) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> f) <del>Remediating, when adverse effects on other values cannot be avoided; and</del> g) <del>Mitigating when adverse effects on other values cannot be avoided or remediated; and</del> h) ..."	<ul style="list-style-type: none"> <li>• The PRPS does not correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
155	Land management for economic	Policy 4.3.1 - Managing for rural	Amend	Amend as follows:	• Significant Industry Activities (tourism and primary production)

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	production	activities		<p><del>"Managing for rural- Protecting regionally significant industry activities from inappropriate subdivision, use and development</del></p> <p>Manage activities in rural areas, to support the region's economy and communities, by:</p> <p>a) Enabling <u>regionally significant industry activities</u> <del>, farming and other rural activities that support the rural economy;</del> and</p> <p>b) Minimising the loss of <u>regionally significant soils</u> <del>highly valued for their versatility for primary production;</del> and</p> <p>c) Restricting the establishment of activities <del>in rural areas</del> that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u>; and</p> <p>d) <del>Minimising</del> <u>Restricting</u> the subdivision of productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and</p> <p>e) Providing for other activities that have a functional need to locate in rural areas <del>, including tourism and recreational activities that are of a nature and scale compatible with rural activities.</del>"</p>	<p>should be defined, recognised and provided for.</p> <ul style="list-style-type: none"> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> </ul>
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Amend	<p>Amend as follows:</p> <p>"Recognising <u>and providing for</u> the values of Otago's central business districts</p> <p>Recognise <u>and provide for</u> the values of Otago's central business districts, including as the primary focal point for social, cultural and economic activities within a community."</p>	No reason given.
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	<p>Amend as follows: "Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of <del>the Otago's</del> central business districts and support local commercial needs, by:</p> <p>a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and</p> <p>...</p> <p>c) Avoiding unplanned extension of commercial activities that has significant adverse effects on <del>the a</del> central business district, including on the efficient use of infrastructure, employment and services; and</p> <p>..."</p>	No reason given.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	<p>Amend as follows: "Manage the finite nature of land suitable and available for industrial activities, by:</p> <p>a) Providing specific areas to accommodate <del>the effects of</del> industrial activities; and</p> <p>b) Providing a range of land suitable for different industrial activities <del>, including land extensive activities;</del> and</p> <p>c) Restricting the establishment of activities in industrial areas that may result in:</p>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				i. Reverse sensitivity effects <u>on industrial activities</u> ; or ii. Inefficient use of industrial land or infrastructure."	
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend as follows: "Managing locational needs for mineral and gas exploration, extraction and processing Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Giving preference to avoiding their location in-</del> <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on:</u> i. ... b) Restricting the establishment of <del>those</del> activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities.</u> "	No reason given.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in-</del> ... <del>e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and,</del> ... g) Considering the use of offsetting, or compensatory measures, <u>to address</u> <del>for</del> residual adverse effects <u>on the environment</u> ; and ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values <del>only</del> when: a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and b) Those <u>adverse</u> effects cannot be avoided, remedied or mitigated; and c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."	<ul style="list-style-type: none"> <li>• The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection.</li> <li>• Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Amend as follows: " <del>Providing for o</del> Offsetting <del>for</del> <u>from adverse effects on</u> indigenous biodiversity Provide for offsetting <del>for</del> <u>from adverse effects</u> on indigenous biodiversity, when <del>it is enabled,</del> <u>by ensuring that:</u>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				a) The offset achieves no net loss <del>and preferably a net gain</del> in indigenous biodiversity values; and b) The offset is undertaken close to the location of development <del>, where this will result in the best ecological outcome</del> ; and..."	
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	Add the following method: "1.1.4 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."	No reason given.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<ul style="list-style-type: none"> <li>Amend Method 1.2.1 as follows: "Identify <del>and protect from inappropriate subdivision, use and development</del>, places, areas or landscapes of cultural, spiritual or traditional significance to them;"</li> <li>Amend Method 1.2.2 as follows: "Identify, and protect <del>from inappropriate subdivision, use and development</del>, the values that contribute to their significance;"</li> <li>Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</li> </ul>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Oppose	Delete Method 1.4.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Oppose	Delete Method 2.2	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Oppose	Delete Method 2.3.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting <del>from inappropriate subdivision, use and development</del> , historic heritage places <del>or</del> <del>areas</del> <del>or</del> <del>landscapes</del> located in the beds of rivers, lakes and wetlands or the coastal marine area;"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.12.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7.	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>Unnecessary or ambiguous ("may").</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing	Amend	Amend Method 4.2.1 as follows:	No reason given.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		district plans		"City or district councils will implement Policies 3.2.2 and 3.2.3 <u>to the extent applicable</u> when undertaking natural hazard assessments".	
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend Method 6.1.2 as follows: "Regional, city and district councils, in their areas of responsibility, will identify: ... <del>d) Special amenity landscapes;</del> ... <u>g) Regionally significant soil resources;</u> <u>h) Significant infrastructure;</u> "	<ul style="list-style-type: none"> <li>Concerned about introducing the term of Special Amenity Landscapes.</li> <li>Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> <li>Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. Too high a level of protection could have adverse effects on the economic and social wellbeing of communities.</li> <li>Significant infrastructure should be defined, recognised and provided for.</li> </ul>
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Oppose	Delete Method 7.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
211	Method 8 - Education and Information	Method 8.1.1 - Information from regional, district and city councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
214	Method 8 - Education and Information	Method 8.1.4 - Information from city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
215	Method 9 - Funding	Method 9 - Funding	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
220	Method 11 - Advocacy and Facilitation	Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional	Oppose	Delete Methods.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Amend d) as follows: "d) Facilitate coordination between <del>lifeline utilities</del> <u>significant infrastructure and significant community facilities used</u> for emergency management, including by: i) Recognising the interconnections between <u>significant infrastructure</u> , <del>lifeline utilities</del> ..."	No reason given.
225	Method 11 - Advocacy and Facilitation	Method 11.2.3 - Facilitation by regional, city and district councils	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction,</li> </ul>

Ref	Issue	Provision - optional	Position	Decision Requested	Reason for Decision Requested
248	Appendices	Appendices - general	Oppose	<ul style="list-style-type: none"> <li>Delete Appendix 1.</li> <li>Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS.</li> </ul>	<p>strengthen the PRPS &amp; result in efficiency gains.</p> <ul style="list-style-type: none"> <li>Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and</li> <li>Is not required by RMA S62 or is not an active directive.</li> </ul>
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>Add the following definitions: <ul style="list-style-type: none"> <li>Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance;</li> <li>Significant Community Facility - include facilities that provide essential community services; <ul style="list-style-type: none"> <li>Urban;</li> </ul> </li> <li>Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS;</li> <li>Regionally Significant Industry Activity - include any activity associated with tourism or primary production; <ul style="list-style-type: none"> <li>Hard mitigation measures;</li> </ul> </li> </ul> </li> <li>Amend definition of Kai Tahu to clarify if has the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning documents outside Otago.</li> </ul>	To reduce ambiguity and enable more efficient implementation of the PRPS.
250	Glossaries	Glossary of Te Reo terms	Oppose	Delete and include these terms in the Glossary.	Unnecessary to have 2 separate glossaries.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Delete or amend text that: <ul style="list-style-type: none"> <li>Is duplicated;</li> <li>Is vague or ambiguous;</li> <li>Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation;</li> <li>Is not required by RMA S62 or is not an active directive; and</li> <li>Delete all "need" statements.</li> </ul>	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>"Need" statements are not required by RMA S62 or is not an active directive.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	Any consequential or other amendments required to give effect, or like effect, to any matter raised in the submission.	No reason given.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Retention of all provisions as notified, except as requested in the submission.	No reason given.
6	Overall approach	Schedule 3 - Significance threshold	Oppose	<ul style="list-style-type: none"> <li>Delete; or</li> <li>Amend so it is consistent with case law and insert new criteria to reflect the need to consider offsetting or compensation and to reflect environmental/planning context on a case-by-case basis, e.g.: <ul style="list-style-type: none"> <li>"11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly offset or otherwise compensated, and</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>The S32 report does not evaluate Schedule 3.</li> <li>Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant.</li> <li>Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>consequently reducing the significance of the effect.</p> <ul style="list-style-type: none"> <li>• 12. Environmental Context: The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</li> <li>• 13. Matters of national importance and national significance: The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA. The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS." </li></ul>	
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Amend	Amend as follows: "The principles of Te Tiriti o Waitangi are <u>identified and</u> taken into account in resource management decisions".	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	<p>Amend as follows: "Policy 1.1.2 <u>Identifying and</u> <del>F</del>aking the principles of Te Tiriti o Waitangi into account</p> <p>Ensure that local authorities <del>exercise their functions and powers, to</del> <u>take into account the principles of Te Tiriti o Waitangi identified in Appendix 1A by:</u></p> <ul style="list-style-type: none"> <li>a) <u>Providing</u> <del>Accord</del> Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,</li> <li>b) <del>Involve</del> <u>Involving</u> Kai Tahu in resource management decision-making processes and implementation; and</li> <li>c) <del>Take</del> <u>Taking</u> into account Kai Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taoka ; and</li> <li>d) <del>Ensure</del> <u>Ensuring</u> Kai Tahu have the prerogative to: <ul style="list-style-type: none"> <li>i. <del>Identify</del> <u>Identifying</u> their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and</li> <li>ii. <del>Determine</del> <u>Determining</u> how best to express that relationship; and</li> </ul> </li> <li>e) <del>Ensure</del> <u>Ensuring</u> Kai Tahu are able to exercise kaitiakitaka; and</li> <li>f) <del>Ensure</del> <u>Ensuring</u> that district and regional plans: <ul style="list-style-type: none"> <li>i. <del>Give</del> <u>Giving</u> effect to the Ngai Tahu Claims Settlement Act 1998; and</li> <li>ii. <del>Recognise</del> <u>Recognising</u> and <del>provide</del> <u>providing</u> for statutory acknowledgement areas, as detailed in Schedule 2; and</li> <li>iii. <del>Provide</del> <u>Providing</u> for other areas in Otago that are recognised as significant to Kai</li> </ul> </li> </ul>	Use wording of RMA Part 2.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Tahu in a manner similar to that prescribed for statutory acknowledgement areas."	
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Objective 1.2 Kai Tahu values, rights and interests and customary resources are <u>identified and</u> sustained."	No reason given.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) Ensuring <u>sustainable management of</u> resources supports <del>their</del> customary uses and cultural values (as detailed in Schedules 1A and B); and"	No reason given.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> , on those values and sites <del>, as detailed in Schedule 3</del> ; and"	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<ul style="list-style-type: none"> <li>• Amend b) as follows: "b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and"</li> <li>• Delete c).</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Specify or identify "other cultural values" referred to in other parts of the RPS in Schedule 1A.	No reason given.
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	Amend Issue as follows: "Degradation of <u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time <del>will</del> <u>can</u> cause serious damage."	Regional issues include natural resource management issues.
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected <u>from inappropriate subdivision, use and development</u> ."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <del>Natural</del> <u>Environmental systems and resources</u> are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely affects the <u>environmental</u> value of another..."	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural <del>and physical</del> resources are recognised, <u>and protected from inappropriate subdivision, use and development</u> , <del>maintained and enhanced</del> ."	<ul style="list-style-type: none"> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to:	• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>...</p> <p>c) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u>; and</p> <p>d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u>, unless detrimental to indigenous biodiversity; and</p> <p>...</p> <p>j) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u>; and</p> <p>k) Provide for other cultural values <u>as identified in Schedule 1A</u>; and</p> <p>l) Protect important recreation values <u>from inappropriate subdivision, use and development</u>; and</p> <p>..."</p>	<ul style="list-style-type: none"> <li>• The PRPS should be focused on resource management issues of regional significance.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	<p>Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to:</p> <p>...</p> <p>b) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u>; and</p> <p>...</p> <p>g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u>; and</p> <p>h) Provide for other cultural values <u>as identified in Schedule 1A</u>; and..."</p>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	<p>Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to:</p> <p>...</p> <p>c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u>, unless detrimental to indigenous biodiversity; and</p> <p>...</p> <p>g) Provide for other cultural values <u>as identified in Schedule 1A</u>; and</p> <p>h) Protect important recreation values <u>from inappropriate subdivision, use and development</u>; and</p> <p>..."</p>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend b) as follows: "b)Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	<p>Amend as follows: "Recognise soil values <u>that are of a regional significance</u>, and manage <u>those</u> soils, to:</p> <p>...</p> <p>f) <del>Retain</del> <u>Ensure the primary use of regionally significant soil resources is</u> for primary production purposes; and</p> <p>g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u>; and</p> <p>h) Provide for other cultural values <u>as</u></p>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				identified in Schedule 1A; and ... k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u> ; and ..."	
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Amend c) iii. as follows: "iii. Historical <del>and</del> <del>heritage-</del> associations".	No reason given.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• As applies to all landscape assessments, including for "Special Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Add the following new policy: <u>"Managing cross boundary landscape effects Promote alignment of District Plans and integrated assessments of environmental effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries."</u>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries, which would benefit from a regionally integrated approach.</li> <li>• This proposed policy would be as effective as the provisions on Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: " <del>Protect and enhance</del> <u>Manage subdivision, use and development that affects</u> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects <del>on those values which contribute</del> <u>which will result in</u> to the area or habitat <u>losing its being significant status</u> ; and b) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on other values of the area or habitat; and <del>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and ..."</del>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend as follows: " <del>Identify areas and values of outstanding natural features, landscapes and seascapes</del> <u>using the attributes as detailed in Schedule 4.</u> "	<ul style="list-style-type: none"> <li>• These attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• Schedule 4 should be deleted</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: " <del>Protect, enhance and restore</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding natural features, landscapes and seascapes, by:	<ul style="list-style-type: none"> <li>• Could disrupt the balance of the values of outstanding natural landscapes and features and other important values.</li> <li>• For example, ski fields are appropriate to locate in alpine environments that may be considered outstanding natural landscapes.</li> <li>• Ensuring such businesses can continue to operate and provide an</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>a) Avoiding adverse effects <del>on those values which contribute to, which will result in the loss of the</del> significance of the natural feature, landscape or seascape; and</p> <p>...</p> <p><del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del></p> <p>...</p> <p><u>g) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values</u></p> <p><u>(h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate</u>".</p>	<p>important recreational and economic resource to Otago should be borne in mind.</p> <ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding <del>, using the attributes detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of different criteria being used in current or proposed district plans, and hence, creating inefficiencies and potentially slowing down forthcoming district plan reviews. These concerns also relation to Schedule 4.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social wellbeing of communities.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Amend as follows: " <del>Protect or enhance the values of: <u>Manage</u>, special amenity landscapes and highly valued natural features, by:</del>	<ul style="list-style-type: none"> <li>• Level of protection not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it.</li> <li>• Better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category.</li> <li>• The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend as follows: "Preserve or enhance the natural character values of the coastal environment, by:	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><del>contribute to the outstanding natural character of an area; and</del>            b) Avoiding significant adverse effects <u>and avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment</u> <del>on those values which contribute to the high natural character values of an area; and</del>            c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del>            d) <del>Avoiding, remedying or mitigating other adverse effects on other values; and...</del>"</p>	
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	<p>Amend as follows: "<u>Protect, Manage subdivision, use and development that affects the values of outstanding water bodies and wetlands by:</u>            a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> , including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and            ...            -e) <del>Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> ..."</p>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	<p>Amend as follows:            "Policy 2.2.14 Identifying <del>highly valued</del> <u>regionally significant</u> soil resources            Identify areas and values of <del>highly valued</del> <u>regionally significant</u> soil resources, using the following criteria:            ..."</p>	No reason given.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	<p>Amend as follows:            "Policy 2.2.15 Managing <del>highly valued</del> <u>regionally significant</u> soil resources            Protect the values of <del>areas of highly valued</del> <u>regionally significant</u> soil resources, by:            a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on those values which contribute to the soil being <del>highly valued</del> <u>regionally significant</u>; and            ...            -e) <del>Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del>            d) Recognising that <u>loss of regionally significant soils to urban expansion development</u> may be appropriate <u>near</u> <del>due to location and proximity to</del> existing urban development, <u>and infrastructure particularly when there is a lack of supply of land available for urban development.</u>"</p>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	<p>Amend as follows: "<del>Natural resource</del>sSystems and their interdependencies are recognised"</p>	No reason given.
59	Natural systems and	Policy suite 2.3 - Natural	Amend	Add the following policy:	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	interdependencies	resource systems and their interdependencies are recognised		<u>"Applying an integrated management approach for significant infrastructure and activities that affect significant infrastructure</u> <u>Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure, by:</u> <u>a) Promoting consistent corridor management throughout the region."</u>	boundaries and would therefore benefit from a regionally integrated approach. • Amendments sought to improve the management of cross boundary issues and resources.
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>• Amend a) as follows: "a) Taking into account the impacts of management of one resource on the <u>environmental</u> values of another, or on the environment in general; and"</li> <li>• Add the following clauses: " c) <u>Ensuring that resource objectives are complementary across administrative boundaries; and</u> d) <u>Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units."</u></li> </ul>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete policy.	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
66	Objectives on resilience, health and safety	Issue 3.1 - Risk of overreaching the environment's carrying capacity	Amend	Amend as follows: "Activities that <u>utilise resources</u> <del>are undertaken</del> without regard to <del>their local</del> <u>environmental values</u> <del>are at greater risk</del> <u>inappropriately compromising</u> <del>of overreaching that</del> <u>the</u> environment's ability to sustain the activity."	No reason given.
70	Objectives on resilience, health and safety	Issue 3.5 - Importance of infrastructure of regional or national significance	Amend	Amend as follows: " <u>It is important to recognise and provide for Significant Infrastructure of regional and national significance</u> <del>even though it may result in local</del> <u>adverse environmental effects</u> <del>impacts, or adversely affect other nationally important values...</del> "	Significant infrastructure should be defined, recognised and provided for.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of <del>natural and physical</del> resources recognises environmental constraints".	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising <del>natural and physical</del> environmental constraints Recognise the <del>natural and physical</del> environmental constraints of <u>resources</u> <del>an area</del> , the <u>environmental</u> effects of those constraints on activities <u>utilising those resources</u> , and the <u>environmental</u> effects of those activities on those constraints, <del>including with particular recognition of</del> : ... c) The sensitivity of <del>the natural and physical</del> resources to adverse effects from the proposed activity/land use; and	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				...	
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Amend Objective 3.2 as follows: " <u>Inappropriate</u> risk that natural hazards pose to Otago's communities are minimised"	Designing to a 100 year level may be appropriate, but it would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities <del>including hazards of low likelihood and high consequence.</del> "	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows: "Manage natural hazard risk, <del>including</del> with <u>particular</u> regard to: a) The risk <del>they</del> posed, considering the likelihood and consequences of natural hazard events; and ..."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend 1st sentence as follows: "Assess activities <u>in areas known to be subject to an identified</u> <del>for</del> natural hazard risk, by considering:..."	No reason given.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Policy 3.2.6 Avoiding increased natural hazard risk <u>from inappropriate subdivision, use and development</u> Avoid <u>remedy or mitigate increased</u> <del>increasing</del> natural hazard risk <u>from inappropriate subdivision, use and development</u> , including by:..."	<ul style="list-style-type: none"> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• It would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).</li> </ul>
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend 1st sentence as follows: "Reduce existing natural hazard risk, <del>including particularly by:</del> "	No reason given.
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) There is significant <del>public or environmental</del> benefit in doing so; or b) The work relates to the functioning ability of <u>significant infrastructure, a lifeline utility, or facility used</u> for essential or emergency services <u>, or a significant community facility.</u> "	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ... b) Designing infrastructure to take into account: ... iv. <del>Natural and physical</del> Resource constraints; and v. Effects on the values of natural and physical resources; and ... c) Managing urban growth <u>in a coordinated manner to ensure</u> : i. <del>Within areas that have</del> sufficient infrastructure <u>services are provided</u> <del>capacity</del> ; or ii. <del>Where infrastructure services can be upgraded or extended</del> efficiently and effectively	<ul style="list-style-type: none"> <li>• Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community costs than benefits in high growth areas.</li> <li>• Regulation of the release of land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>;- and</p> <p>d) Co-ordinating the design and development of infrastructure with the staging of land use change, including with:</p> <p>i. Structural design and release of land for new urban development; or</p> <p>ii. Structural redesign and redevelopment within existing urban areas."</p>	
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	<p>Amend as follows: "Manage infrastructure activities, to:</p> <p>...</p> <p>b) <del>Reduce</del> <u>Avoid, remedy or mitigate</u> adverse effects of those activities, including cumulative adverse effects on <del>natural and physical</del> resources; and</p> <p>c) Support economic, social and community <u>needs</u> activities; and</p> <p>d) Improve efficiency of use of <del>natural</del> resources; and</p> <p>e) Protect infrastructure corridors <u>from inappropriate subdivision, uses and development</u>, for infrastructure needs, now and for the future; and</p> <p>...</p> <p>g) Protect the functioning of <u>significant infrastructure</u>, <del>lifeline utilities</del> and essential or emergency services."</p>	Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	<p>Amend as follows:</p> <p>"Policy 3.4.3 Designing <del>lifeline utilities</del> <u>significant infrastructure</u> and facilities for essential or emergency services</p> <p>Design <del>lifeline utilities</del> <u>significant infrastructure</u>, and facilities for essential or emergency services, to..."</p>	No reason given.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, <del>lifeline utilities</del>, <u>significant infrastructure</u>, and essential and emergency services".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	<p>Amend as follows: "<u>Significant</u> Infrastructure of <del>national and regional significance</del> is <u>recognised and provided for</u>, <del>managed in a sustainable way</del>."</p>	Significant infrastructure should be defined, recognised and provided for.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	<p>Amend as follows:</p> <p>"Policy 3.5.1 Recognising <u>and providing for</u> <del>national and regional</del> significance of infrastructure</p> <p>Recognise <u>and provide for</u> the <del>national and regional</del> significance of the following infrastructure:</p> <p>a) Renewable electricity generation facilities <del>where they supply the national electricity grid and local distribution network</del>; and</p> <p>...</p> <p>f) Structures for transportation by rail <u>and tourism activities</u>."</p>	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The PRPS does not give enough recognition of and provision for the tourism sector.</li> </ul>

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105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend as follows: "Policy 3.5.2 Managing adverse effects of <u>significant</u> infrastructure <del>that has national or regional significance</del> <del>Minimise</del> <u>Avoid, remedy or mitigate</u> adverse effects from <u>significant</u> infrastructure <del>that has national or regional significance</del> , by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in:</del> ... b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding</del> <u>minimising</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and ... <del>d) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> e) <del>Considering</del> <u>Enabling infrastructure providers to employ</u> the use of offsetting <del>or</del> other compensatory measures <u>to address</u> <del>for</del> residual adverse effects on <u>the environment indigenous biodiversity</u> ."	<ul style="list-style-type: none"> <li>• Significant infrastructure should be defined, recognised and provided for.</li> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<ul style="list-style-type: none"> <li>• Amend header as follows: "Protecting <u>significant</u> infrastructure <del>of national or regional significance</del>".</li> <li>• Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>• Significant infrastructure should be defined, recognised and provided for.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	Amend as follows: "Policy 3.6.2 Promoting small <u>and community</u> scale renewable electricity generation Promote small <u>and community</u> scale renewable electricity generation activities that : a) <del>Increase the local community's resilience and security of energy supply; and</del> b) <del>Avoid, remedy or mitigate adverse effects from that activity."</del>	No reason given.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	<ul style="list-style-type: none"> <li>• Amend 1st sentence as follows: "Protect the generation capacity of <u>nationally or regionally significant</u> renewable electricity generation activities, by..."</li> <li>• Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	Amend as follows: <ul style="list-style-type: none"> <li>• Delete d).</li> <li>• "e) Protecting <del>existing</del> distribution corridors for infrastructure needs, now and for the future."</li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	Amend as follows: "Encourage the use of good urban design principles in subdivision and development in urban areas <del>as detailed in Schedule 6</del> , to: ... b) Ensure that the built form relates well to its	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><del>surrounding</del> -natural environment -including by:</p> <p>i. <del>Reflecting natural features such as rivers, lakes, wetlands and topography; and</del></p> <p>ii. <del>Providing for ecological corridors in urban areas; and</del></p> <p>iii. <del>Protecting areas of indigenous biodiversity and habitat for indigenous fauna; and</del></p> <p>iv. <del>Encouraging use of low impact design techniques; and</del></p> <p>v. <del>Encouraging construction of warmer buildings ; and</del></p> <p>...</p>	
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend a) as follows: "a) <del>Maximising</del> <u>Optimising</u> passive solar gain; and"	No reason given.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend as follows: "Design <u>and maintain</u> public spaces, including streets and open spaces, to <u>provide for a range of uses and</u> meeting the reasonable access and mobility needs of all sectors within the community <del>including the young and those with mobility impairments.</del> "	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	<p>Amend as follows:</p> <p>"Policy 3.8.1 <del>Managing</del> <u>Providing</u> for urban growth</p> <p><del>Manage</del> <u>Provide for</u> urban growth and creation of new urban land in a strategic and co-ordinated way, by:</p> <p>a) <u>Understanding demand and supply of</u> <del>Ensuring there is sufficient</del> residential, commercial and industrial <u>zoned</u> land capacity, <del>to</del> <u>and catering for that</u> demand <del>for such land, projected over at least the next 10 years;</del> and</p> <p>b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to:</p> <p>i. Provide infrastructure in an efficient and effective way; and</p> <p>ii. <del>Avoid</del> <u>Discouraging</u> additional costs <u>on the public</u> that arise from unplanned infrastructure expansion; and</p> <p>c) Identifying future growth areas that:</p> <p>i. Minimise <u>significant</u> adverse effects on <del>rural the</del> productivity of the rural and tourism sectors <del>including loss of highly-valued soils or creating competing urban demand for water and other resources;</del> and</p> <p>ii. <u>Can be developed without resulting in significant adverse effects on any matter of national importance or national significance</u> <del>Maintain or enhance significant biodiversity.</del></p>	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community.</li> <li>• Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS.</li> <li>• "Considering the need for urban growth boundaries" should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential methods.</li> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><del>landscape or natural character values; and</del>  <del>iii. Maintain important cultural or heritage values; and</del>  <del>iv. iii. Avoid land with significant risk from natural hazards which cannot be remedied or mitigated; and</del>  d) Considering the need for urban growth boundaries to control <del>potentially inappropriate</del> urban expansion; and  e) Ensuring efficient use of land; and  f) Requiring the use of low or no-emission heating systems in buildings, <del>when</del> <u>where</u> ambient air quality <del>in or near the growth area</del> is:  i. Below standards for human health; or  ii. Vulnerable to degradation given the local climatic and geographical context; and  g) Giving effect to the principles of good urban design <del>, as detailed in Schedule 6;</del> and  h) Giving effect to the principles of crime prevention through environmental design</p>	<p>design protocol &amp; matters set out in District Plans) for little added benefits.  • May be to the detriment of good urban design for specific sites.</p>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	Delete the policy.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> </ul>

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					<ul style="list-style-type: none"> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<p>Amend as follows: "Manage subdivision, use and development of rural land, to:</p> <p>a) Avoid <u>inappropriate</u> development or fragmentation of land, <u>particularly</u> which undermines or forecloses the potential of rural land:</p> <p>i. For primary production <u>or tourism</u>; or</p> <p>...</p> <p>b) Have particular regard to whether the proposal will result in a loss of the productive potential of <u>regionally significant</u> <del>highly versatile</del> soils, unless:</p> <p>i. The land adjoins an existing urban area and there is no other land suitable for urban expansion, <u>or there is a shortage of land available for urban development</u>; and</p> <p>ii. <del>There highly versatile soils are needed for urban expansion,</del> any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and</p> <p>iii. reverse sensitivity effects on rural productive activities can be <u>satisfactorily</u> avoided; and</p> <p>c) Avoid unplanned demand for provision of <u>public infrastructure investment</u>, including domestic water supply and waste disposal; and</p> <p>d) Avoid creating <u>significant</u> competing demand for water <del>or other</del> resources."</p>	<ul style="list-style-type: none"> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	<p>Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk</u> <del>harm</del> human health or the quality of the environment <del>in Otago</del>".</p>	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	<p>Amend c) as follows: "c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and".</p>	No reason given.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	<p>Amend a) as follows: "a) Prior to subdivision or development of potentially contaminated land, <del>requiring</del> <u>ensuring</u> a site investigation is undertaken to determine the nature or extent of any contamination; and"</p>	No reason given.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	<p>Amend as follows: "Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably degrade natural values</u>".</p>	<ul style="list-style-type: none"> <li>• Avoiding the creation of new contaminated land may not always be appropriate or practical: in remediating contaminated land it may be appropriate to move soil to another location depending on where it is situated and how that land is to be used.</li> <li>• The emphasis should be on avoiding risks to human health or the environment.</li> </ul>
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	<ul style="list-style-type: none"> <li>• Add the following objective: "Significant industry activities and physical resources are provided for".</li> <li>• Add the following policy: "Recognising and providing for significant</li> </ul>	Regionally Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>industry activities and physical resources            Recognising and providing for significant industry activities and physical resources, by:</p> <p>a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety;</p> <p>b) Protecting significant industry activities from inappropriate subdivision, use, and development;</p> <p>c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated."</p> <p>• Add the following Method:            "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to:</p> <p>a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and cultural well-being;</p> <p>b) Protect significant industry activities from inappropriate subdivision, use, and development;</p> <p>c) Enable significant industry activities and development that does not have a significant adverse effect on the environment;</p> <p>d) Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance."</p>	
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Amend	Amend as follows: " <del>Sometimes, existing businesses may be placed at risk by pressure to change- activities are susceptible to reverse sensitivity effects, particularly when land use changes -to activities that may compete or conflict, creating reverse sensitivities.</del> "	No reason given.
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows: " <del>Many natural and physical resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users.</del> "	No reason given.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend as follows: "Maintain and <del>where possible,</del> enhance public access to the natural environment, including to the coast, lakes, rivers and their margins, and areas of cultural or historic significance, unless restricting access is necessary to: ... b) Protect the <del>natural heritage and ecosystem</del>	No reason given.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				values of sensitive natural areas or habitats; or..."	
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: " <u>Significant h</u> Historic heritage resources are recognised and contribute to the region's character and sense of identity".	No reason given.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: " <u>Manage historic heritage values to p</u> Protect and enhance the values of places and areas of historic heritage <u>from inappropriate development</u> , by: ... c) Avoiding <u>remedying or mitigating</u> adverse effects on those values which contribute to the area or place being of regional or national significance; and -d) <u>Avoiding significant adverse effects on other values of areas and places of historic heritage</u> ; and e) <u>Assessing the significance of adverse effects on those values, as detailed in Schedule 3</u> ; and f) <u>Remediating, when adverse effects on other values cannot be avoided</u> ; and g) <u>Mitigating when adverse effects on other values cannot be avoided or remediated</u> ; and h) ..."	<ul style="list-style-type: none"> <li>• The PRPS does not correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows: " <u>Managing for rural- Protecting regionally significant industry activities from inappropriate subdivision, use and development</u> Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling <u>regionally significant industry activities</u> , <u>farming and other rural activities that support the rural economy</u> ; and b) Minimising the loss of <u>regionally significant soils -highly valued for their versatility for primary production</u> ; and c) Restricting the establishment of activities <u>in rural areas</u> that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u> ; and d) <u>Minimising- Restricting</u> the subdivision of productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and e) Providing for other activities that have a functional need to locate in rural areas <u>including tourism and recreational activities that are of a nature and scale compatible with rural activities</u> ."	<ul style="list-style-type: none"> <li>• Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.</li> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> </ul>
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Amend	Amend as follows: "Recognising <u>and providing for</u> the values of Otago's central business districts Recognise <u>and provide for</u> the values of Otago's central business districts, including as the primary focal point for social, cultural and	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	economic activities within a community." Amend as follows: "Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of <del>the</del> <u>Otago's</u> central business districts and support local commercial needs, by: a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and ... c) Avoiding unplanned extension of commercial activities that has significant adverse effects on <del>the</del> <u>a</u> central business district, including on the efficient use of infrastructure, employment and services; and ..."	No reason given.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	Amend as follows: "Manage the finite nature of land suitable and available for industrial activities, by: a) Providing specific areas to accommodate <del>the effects of</del> industrial activities; and b) Providing a range of land suitable for different industrial activities, <del>including land extensive activities</del> ; and c) Restricting the establishment of activities in industrial areas that may result in: i. Reverse sensitivity effects <u>on industrial activities</u> ; or ii. Inefficient use of industrial land or infrastructure."	No reason given.
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend as follows: "Managing locational needs for mineral and gas exploration, extraction and processing Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Giving preference to avoiding their location in</del> <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> : i. ... b) Restricting the establishment of <del>these</del> activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities</u> ."	No reason given.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in</del> :"	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				... e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and, ... g) Considering the use of offsetting, or compensatory measures, <u>to address</u> <del>for</del> residual adverse effects <u>on the environment</u> ; and ..."	
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values <del>only</del> when: a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and b) Those <u>adverse</u> effects cannot be avoided, remedied or mitigated; and c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."	<ul style="list-style-type: none"> <li>The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection.</li> <li>Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Amend as follows: " <del>Providing for o</del> Offsetting <del>for</del> <u>from adverse effects on</u> indigenous biodiversity Provide for offsetting <del>for</del> <u>from adverse effects</u> on indigenous biodiversity, when <del>it is enabled</del> , by ensuring that: a) The offset achieves no net loss <del>and preferably a net gain</del> in indigenous biodiversity values; and b) The offset is undertaken close to the location of development <del>where this will result in the best ecological outcome</del> ; and..."	No reason given.
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	Add the following method: "1.1.4 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."	No reason given.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<ul style="list-style-type: none"> <li>Amend Method 1.2.1 as follows: "Identify <u>and protect from inappropriate subdivision, use and development</u> places, areas or landscapes of cultural, spiritual or traditional significance to them;"</li> <li>Amend Method 1.2.2 as follows: "Identify, and protect <u>from inappropriate subdivision, use and development</u>, the values that contribute to their significance;"</li> <li>Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</li> </ul>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Oppose	Delete Method 1.4.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Oppose	Delete Method 2.2	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Oppose	Delete Method 2.3.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting <u>from inappropriate subdivision, use and development</u> , historic heritage places <u>or</u> areas <del>or landscapes</del> located in the beds of rivers, lakes and wetlands or the coastal marine area;"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.12.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7.	<ul style="list-style-type: none"> <li>• Efficiency gains in removing unnecessary provisions.</li> <li>• Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>• Unnecessary or ambiguous ("may").</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend Method 4.2.1 as follows: "City or district councils will implement Policies 3.2.2 and 3.2.3 <u>to the extent applicable</u> when undertaking natural hazard assessments".	No reason given.
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend Method 6.1.2 as follows: "Regional, city and district councils, in their areas of responsibility, will identify: ... d) <u>Special amenity landscapes</u> ; ... q) <u>Regionally significant soil resources</u> ; h) <u>Significant infrastructure</u> ;"	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. Too high a level of protection could have adverse effects on the economic and social wellbeing of communities.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> </ul>
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Oppose	Delete Method 7.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
211	Method 8 - Education and Information	Method 8.1.1 - Information from regional, district and city councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
214	Method 8 - Education and Information	Method 8.1.4 - Information from city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
215	Method 9 - Funding	Method 9 - Funding	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
220	Method 11 - Advocacy and Facilitation	Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional	Oppose	Delete Methods.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Amend d) as follows: "d) Facilitate coordination between <del>lifeline utilities</del> <u>significant infrastructure and significant community facilities used</u> for emergency management, including by: i) Recognising the interconnections between <u>significant infrastructure</u> , <del>lifeline utilities</del> ;..."	No reason given.
225	Method 11 - Advocacy and Facilitation	Method 11.2.3 - Facilitation by regional, city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
248	Appendices	Appendices - general	Oppose	<ul style="list-style-type: none"> <li>Delete Appendix 1.</li> <li>Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS.</li> </ul>	<ul style="list-style-type: none"> <li>Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and</li> <li>Is not required by RMA S62 or is not an active directive.</li> </ul>
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>Add the following definitions: <ul style="list-style-type: none"> <li>Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance;</li> <li>Significant Community Facility - include facilities that provide essential community services; <ul style="list-style-type: none"> <li>Urban;</li> </ul> </li> <li>Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS;</li> <li>Regionally Significant Industry Activity - include any activity associated with tourism or primary production; <ul style="list-style-type: none"> <li>Hard mitigation measures;</li> </ul> </li> </ul> </li> <li>Amend definition of Kai Tahu to clarify if has the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning documents outside Otago.</li> </ul>	To reduce ambiguity and enable more efficient implementation of the PRPS.
250	Glossaries	Glossary of Te Reo terms	Oppose	Delete and include these terms in the Glossary.	Unnecessary to have 2 separate glossaries.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Delete or amend text that: <ul style="list-style-type: none"> <li>Is duplicated;</li> </ul>	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Is vague or ambiguous;</li> <li>• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation;</li> <li>• Is not required by RMA S62 or is not an active directive; and</li> <li>• Delete all "need" statements.</li> </ul>	strengthen the PRPS. <ul style="list-style-type: none"> <li>• "Need" statements are not required by RMA S62 or is not an active directive.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	<ul style="list-style-type: none"> <li>• Any consequential or other amendments required to give effect, or like effect, to any matter raised in the submission.</li> </ul>	No reason given.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	<ul style="list-style-type: none"> <li>• Retention of all provisions as notified, except as requested in the submission.</li> </ul>	No reason given.
6	Overall approach	Schedule 3 - Significance threshold	Oppose	<ul style="list-style-type: none"> <li>• Delete; or</li> <li>• Amend so it is consistent with case law and insert new criteria to reflect the need to consider offsetting or compensation and to reflect environmental/planning context on a case-by-case basis, e.g.:               <ul style="list-style-type: none"> <li>• 11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly offset or otherwise compensated, and consequently reducing the significance of the effect.</li> <li>• 12. Environmental Context: The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</li> <li>• 13. Matters of national importance and national significance: The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA. The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS."</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• The S32 report does not evaluate Schedule 3.</li> <li>• Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant.</li> <li>• Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.</li> </ul>
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Amend	Amend as follows: "The principles of Te Tiriti o Waitangi are <u>identified and</u> taken into account in resource management decisions".	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	Amend as follows: "Policy 1.1.2 <u>Identifying and</u> <del>t</del> Faking the principles of Te Tiriti o Waitangi into account Ensure that local authorities <del>exercise their functions and powers, to-</del> <u>take into account the principles of Te Tiriti o Waitangi identified in Appendix 1A by:</u> a) <u>Providing</u> <del>Accord-</del> Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,	Use wording of RMA Part 2.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>b) <del>Involvement</del> <u>Involving</u> Kai Tahu in resource management decision-making processes and implementation; and</p> <p>c) <del>Take</del> <u>Taking</u> into account Kai Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taoka ; and</p> <p>d) <del>Ensure</del> <u>Ensuring</u> Kai Tahu have the prerogative to:</p> <p>i. <del>Identify</del> <u>Identifying</u> their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and</p> <p>ii. <del>Determine</del> <u>Determining</u> how best to express that relationship; and</p> <p>e) <del>Ensure</del> <u>Ensuring</u> Kai Tahu are able to exercise kaitiakitaka; and</p> <p>f) <del>Ensure</del> <u>Ensuring</u> that district and regional plans:</p> <p>i. <del>Give</del> <u>Giving</u> effect to the Ngai Tahu Claims Settlement Act 1998; and</p> <p>ii. <del>Recognise</del> <u>Recognising</u> and <del>provide</del> <u>providing</u> for statutory acknowledgement areas, as detailed in Schedule 2; and</p> <p>iii. <del>Provide</del> <u>Providing</u> for other areas in Otago that are recognised as significant to Kai Tahu in a manner similar to that prescribed for statutory acknowledgement areas."</p>	
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Objective 1.2 Kai Tahu values, rights and interests and customary resources are <u>identified and</u> sustained."	No reason given.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) Ensuring <u>sustainable management of</u> resources supports <del>their</del> customary uses and cultural values (as detailed in Schedules 1A and B); and"	No reason given.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> , on those values and sites , <del>as detailed in Schedule 3</del> ; and"	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<ul style="list-style-type: none"> <li>• Amend b) as follows: "b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and"</li> <li>• Delete c).</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Specify or identify "other cultural values" referred to in other parts of the RPS in Schedule 1A.	No reason given.
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	Amend Issue as follows: "Degradation of <u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life	Regional issues include natural resource management issues.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time <del>will</del> <u>can</u> cause serious damage."	
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected <u>from inappropriate subdivision, use and development</u> ."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <del>Natural</del> <u>Environmental</u> systems <u>and resources</u> are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely affects the <u>environmental</u> value of another..."	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural <del>and physical</del> resources are recognised, <u>and protected from inappropriate subdivision, use and development</u> <del>maintained and enhanced</del> ."	<ul style="list-style-type: none"> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to: ... c) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... j) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and k) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and l) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ... b) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and ... g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... g) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and h) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend b) as follows: "b)Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those soils</u> , to: ... f) <del>Retain</del> <u>Ensure the primary use of regionally significant soil resources is for primary production purposes</u> ; and g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and ... k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Amend c) iii. as follows: "iii. Historical <del>and heritage</del> associations".	No reason given.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• As applies to all landscape assessments, including for "Special Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Add the following new policy: <u>"Managing cross boundary landscape effects Promote alignment of District Plans and integrated assessments of environmental</u>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries, which would benefit from a regionally integrated approach.</li> <li>• This proposed policy would be as effective as the provisions on</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<u>effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries.</u> "	Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters.
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: " <del>Protect and enhance</del> <u>Manage subdivision, use and development that affects</u> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects <del>on those values which contribute</del> <u>which will result in</u> to the area or habitat <del>losing its being</del> significant <u>status</u> ; and b) Avoiding significant adverse effects <del>from inappropriate subdivision, use and development on other values of the area or habitat; and</del> <del>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes <del>, using the attributes as detailed in Schedule 4.</del> ."	<ul style="list-style-type: none"> <li>• These attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• Schedule 4 should be deleted</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: " <del>Protect, enhance and restore.</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding natural features, landscapes and seascapes, by: a) Avoiding adverse effects <del>on those values which contribute to</del> <u>which will result in</u> the <del>loss of the</del> significance of the natural feature, landscape or seascape; and ... <del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> ... ... <u>g) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values</u> <u>(h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate</u> ."	<ul style="list-style-type: none"> <li>• Could disrupt the balance of the values of outstanding natural landscapes and features and other important values.</li> <li>• For example, ski fields are appropriate to locate in alpine environments that may be considered outstanding natural landscapes.</li> <li>• Ensuring such businesses can continue to operate and provide an important recreational and economic resource to Otago should be borne in mind.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding <del>, using the attributes detailed in Schedule 4.</del> ."	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of different criteria being used in current or proposed district plans, and hence, creating inefficiencies and potentially slowing down forthcoming district plan reviews. These concerns also relation to Schedule 4.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Amend as follows: " <del>Protect or enhance the values of. <u>Manage</u> special amenity landscapes and highly valued natural features, by:</del> a) <del>Avoiding, <u>remediating or mitigating</u> significant</del> adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and <del>b) <u>Avoiding, remediating or mitigating other adverse effects on other values;</u> and</del> c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> ... <u>d) Recognising and providing for the use of such resources including as places where productive activities, tourism, recreation, infrastructure, homes and work places are located.</u> e) <u>Allowing values to adapt over time as communities and economies change.</u> "	wellbeing of communities. <ul style="list-style-type: none"> <li>Level of protection not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it.</li> <li>Better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment.</li> <li>Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category.</li> <li>The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely affected.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend as follows: "Preserve or enhance the natural character values of the coastal environment, by: a) <u>Avoiding adverse effects of activities on natural character in areas of the coastal environment with</u> <del>on those values which contribute to the</del> outstanding natural character of an area; and b) <u>Avoiding significant adverse effects and avoiding, remediating or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment</u> <del>on those values which contribute to the high natural character values of an area;</del> and c) <u>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</u> d) <u>Avoiding, remediating or mitigating other adverse effects on other values; and...</u> "	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend as follows: " <del>Protect. <u>Manage</u> subdivision, use and development that affects the values of outstanding water bodies and wetlands by:</del> a) <u>Avoiding significant adverse effects from inappropriate subdivision, use and development</u> , including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and ... c) <u>Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</u> ..."	<ul style="list-style-type: none"> <li>Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	Amend as follows: "Policy 2.2.14 Identifying <del>highly valued</del> <u>regionally significant</u> soil resources Identify areas and values of <del>highly valued</del>	No reason given.

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				regionally significant soil resources, using the following criteria: ..."	
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Amend as follows: "Policy 2.2.15 Managing <del>highly valued</del> <u>regionally significant</u> soil resources Protect the values of <del>areas of highly valued</del> <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on those values which contribute to the soil being <del>highly valued</del> <u>regionally significant</u> ; and ... -e) <del>Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> d) Recognising that <u>loss of regionally significant soils to urban expansion development</u> may be appropriate <u>near</u> <del>due to location and proximity to</del> existing urban development <del>and infrastructure</del> <u>particularly when there is a lack of supply of land available for urban development</u> ."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend as follows: " <del>Natural resource s</del> Systems and their interdependencies are recognised"	No reason given.
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Add the following policy: " <u>Applying an integrated management approach for significant infrastructure and activities that affect significant infrastructure</u> <u>Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure, by:</u> a) <u>Promoting consistent corridor management throughout the region.</u> "	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>• Amend a) as follows: "a) Taking into account the impacts of management of one resource on the <u>environmental</u> values of another, or on the environment in general; and"</li> <li>• Add the following clauses: "<u>c) Ensuring that resource objectives are complementary across administrative boundaries; and</u> <u>d) Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete policy.	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
66	Objectives on resilience, health and safety	Issue 3.1 - Risk of overreaching the environment's carrying capacity	Amend	Amend as follows: "Activities that <u>utilise resources</u> <del>are undertaken</del> without regard to <del>their local</del> environmental values <del>are at greater</del>	No reason given.

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				risk <del>inappropriately compromising</del> <del>of</del> <del>overreaching that</del> <del>the</del> environment's ability to sustain the activity."	
70	Objectives on resilience, health and safety	Issue 3.5 - Importance of infrastructure of regional or national significance	Amend	Amend as follows: " <u>It is important to recognise and provide for Significant Infrastructure of regional and national significance even though it may result in local adverse environmental effects impacts, or adversely affect other nationally important values...</u> "	Significant infrastructure should be defined, recognised and provided for.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of <del>natural and physical</del> resources recognises environmental constraints".	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising <del>natural and physical</del> environmental constraints Recognise the <del>natural and physical</del> environmental constraints of <u>resources</u> <del>an</del> <u>area</u> , the <u>environmental</u> effects of those constraints on activities <u>utilising those resources</u> , and the <u>environmental</u> effects of those activities on those constraints, <del>including</del> <u>with particular recognition of</u> : ... c) The sensitivity of <del>the natural and physical</del> resources to adverse effects from the proposed activity/land use; and ..."	No reason given.
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Amend Objective 3.2 as follows: " <u>Inappropriate</u> risk that natural hazards pose to Otago's communities are minimised"	Designing to a 100 year level may be appropriate, but it would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities ; <del>including hazards of low likelihood and high consequence.</del> "	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows: "Manage natural hazard risk, <del>including</del> with <u>particular</u> regard to: a) The risk <del>they</del> posed, considering the likelihood and consequences of natural hazard events; and ..."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend 1st sentence as follows: "Assess activities <u>in areas known to be subject to an identified</u> <del>for</del> natural hazard risk, by considering..."	No reason given.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Policy 3.2.6 Avoiding increased natural hazard risk <u>from inappropriate subdivision, use and development</u> Avoid <u>remedy or mitigate increased</u> <del>increasing</del> natural hazard risk <u>from inappropriate subdivision, use and development</u> , including by:..."	<ul style="list-style-type: none"> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• It would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).</li> </ul>
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend 1st sentence as follows: "Reduce existing natural hazard risk, <del>including</del>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) There is significant <del>public or environmental</del> benefit in doing so; or b) The work relates to the functioning ability of <u>significant infrastructure, a lifeline utility, or facility used for essential or emergency services, or a significant community facility.</u> "	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ... b) Designing infrastructure to take into account: ... iv. <del>Natural and physical</del> Resource constraints; and v. Effects on the values of natural and physical resources; and ... c) Managing urban growth <u>in a coordinated manner to ensure</u> : i. <del>Within areas that have</del> sufficient infrastructure <u>services are provided</u> <del>capacity</del> ; or ii. <del>Where infrastructure services can be upgraded or extended</del> efficiently and effectively ; and d) <del>Co-ordinating the design and development of infrastructure with the staging of land use change, including with:</del> i. <del>Structural design and release of land for new urban development;</del> or ii. <del>Structural redesign and redevelopment within existing urban areas.</del> "	<ul style="list-style-type: none"> <li>• Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community costs than benefits in high growth areas.</li> <li>• Regulation of the release of land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend as follows: "Manage infrastructure activities, to: ... b) <del>Reduce</del> <u>Avoid, remedy or mitigate</u> adverse effects of those activities, including cumulative adverse effects on <del>natural and physical</del> resources; and c) Support economic, social and community <u>needs</u> <del>activities</del> ; and d) Improve efficiency of use of <del>natural</del> resources; and e) Protect infrastructure corridors <u>from inappropriate subdivision, uses and development</u> <del>for infrastructure needs, now and for the future</del> ; and ... g) Protect the functioning of <u>significant infrastructure</u> <del>lifeline utilities</del> and essential or emergency services."	Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential	Amend	Amend as follows: "Policy 3.4.3 Designing <del>lifeline utilities</del>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		or emergency services		<u>significant infrastructure</u> and facilities for essential or emergency services Design <del>lifeline utilities</del> <u>significant infrastructure</u> , and facilities for essential or emergency services, to..."	
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, <del>lifeline utilities</del>, <u>significant infrastructure</u>, and essential and emergency services".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend as follows: " <u>Significant</u> Infrastructure of national and regional significance <del>is recognised and provided for</del> <u>managed in a sustainable way</u> ."	Significant infrastructure should be defined, recognised and provided for.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	<p>Amend as follows:</p> <p>"Policy 3.5.1 Recognising <u>and providing for</u> national and regional significance of infrastructure</p> <p>Recognise <u>and provide for</u> the national and regional significance of the following infrastructure:</p> <p>a) Renewable electricity generation facilities <del>where they supply the national electricity grid and local distribution network</del>; and</p> <p>...</p> <p>f) Structures for transportation by rail <u>and tourism activities</u>."</p>	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The PRPS does not give enough recognition of and provision for the tourism sector.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	<p>Amend as follows:</p> <p>"Policy 3.5.2 Managing adverse effects of <u>significant</u> infrastructure <del>that has national or regional significance</del></p> <p><del>Minimise</del> <u>Avoid, remedy or mitigate</u> adverse effects from <u>significant</u> infrastructure <del>that has national or regional significance</del>, by:</p> <p>a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in</del>:</p> <p>...</p> <p>b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding</del> <u>minimising</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and</p> <p>...</p> <p>d) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del></p> <p>e) <del>Considering</del> <u>Enabling infrastructure providers to employ</u> the use of offsetting <del>or</del> other compensatory measures <u>to address</u> <del>for</del> residual adverse effects on <u>the environment indigenous biodiversity</u>."</p>	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Protecting <u>significant</u> infrastructure <del>of national or regional</del></li> </ul>	Significant infrastructure should be defined, recognised and provided for.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		regional significance		significance". • Delete d).	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	Amend as follows: "Policy 3.6.2 Promoting small <u>and community</u> scale renewable electricity generation Promote small <u>and community</u> scale renewable electricity generation activities that : a) <del>Increase the local community's resilience and security of energy supply;</del> and b) <del>Avoid, remedy or mitigate adverse effects from that activity."</del>	No reason given.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	• Amend 1st sentence as follows: "Protect the generation capacity of <u>nationally or regionally significant</u> renewable electricity generation activities, by..." • Delete d).	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	Amend as follows: • Delete d). • "e) Protecting <del>existing</del> distribution corridors for infrastructure needs, now and for the future."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	Amend as follows: "Encourage the use of good urban design principles in subdivision and development in urban areas <del>as detailed in Schedule 6</del> , to: ... b) Ensure that the built form relates well to its <u>surrounding natural</u> environment <del>including by:</del> i. <del>Reflecting natural features such as rivers, lakes, wetlands and topography;</del> and ii. <del>Providing for ecological corridors in urban areas;</del> and iii. <del>Protecting areas of indigenous biodiversity and habitat for indigenous fauna;</del> and iv. <del>Encouraging use of low impact design techniques;</del> and v. <del>Encouraging construction of warmer buildings</del> ; and ..."	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend a) as follows: "a) <del>Maximising</del> <u>Optimising</u> passive solar gain; and"	No reason given.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend as follows: "Design <u>and maintain</u> public spaces, including streets and open spaces, to <u>provide for a range of uses and</u> meeting the reasonable access and mobility needs of all sectors within the community <del>including the young and those with mobility impairments</del> ."	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Amend as follows: "Policy 3.8.1 <del>Managing</del> <u>Providing</u> for urban	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>growth</p> <p><del>Manage</del> <u>Provide for</u> urban growth and creation of new urban land in a strategic and co-ordinated way, by:</p> <p>a) <del>Understanding demand and supply of</del> <u>Ensuring there is sufficient</u> residential, commercial and industrial <u>zoned</u> land capacity, <del>to</del> <u>and catering for that demand for</u> such land, <del>projected over at least the next 10 years</del>; and</p> <p>b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to:</p> <p>i. Provide infrastructure in an efficient and effective way; and</p> <p>ii. <del>Avoid</del> <u>Discouraging</u> additional costs <u>on the public</u> that arise from unplanned infrastructure expansion; and</p> <p>c) Identifying future growth areas that:</p> <p>i. Minimise <u>significant</u> adverse effects on <del>rural</del> <u>the productivity of the rural and tourism sectors</u>, <del>including loss of highly valued soils or creating competing urban demand for water and other resources</del>; and</p> <p>ii. <u>Can be developed without resulting in significant adverse effects on any matter of national importance or national significance</u> <u>Maintain or enhance significant biodiversity, landscape or natural character values</u>; and</p> <p><del>iii. Maintain important cultural or heritage values</del>; and</p> <p><del>iv.</del> <u>iii.</u> Avoid land with significant risk from natural hazards <u>which cannot be remedied or mitigated</u>; and</p> <p>d) Considering the need for urban growth boundaries to control <u>potentially inappropriate</u> urban expansion; and</p> <p>e) Ensuring efficient use of land; and</p> <p>f) Requiring the use of low or no-emission heating systems in buildings, <del>when</del> <u>where</u> ambient air quality <del>in or near the growth area</del> is:</p> <p>i. Below standards for human health; or</p> <p>ii. Vulnerable to degradation given the local climatic and geographical context; and</p> <p>g) Giving effect to the principles of good urban design <del>as detailed in Schedule 6</del>; and</p> <p>h) Giving effect to the principles of crime prevention through environmental design</p>	<ul style="list-style-type: none"> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• The rationale for “10 years” of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community.</li> <li>• Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS.</li> <li>• “Considering the need for urban growth boundaries” should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential methods.</li> <li>• “Avoidance” of natural hazards needs to be widened to “avoid, remedy or mitigate”, which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	Delete the policy.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The PRPS does not adequately address the issue of the shortage of</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>zoned land supply, particularly in Queenstown.</p> <ul style="list-style-type: none"> <li>Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<p>Amend as follows: "Manage subdivision, use and development of rural land, to:</p> <p>a) Avoid <u>inappropriate</u> development or fragmentation of land <u>, particularly</u> which undermines or forecloses the potential of rural land:</p> <p>i. For primary production <u>or tourism</u>; or</p> <p>...</p> <p>b) Have particular regard to whether the proposal will result in a loss of the productive potential of <u>regionally significant</u> <del>highly versatile</del> soils, unless:</p> <p>i. The land adjoins an existing urban area and there is no other land suitable for urban expansion <u>, or there is a shortage of land available for urban development</u>; and</p> <p>ii. <del>There highly versatile soils are needed for urban expansion,</del> any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and</p> <p>iii. reverse sensitivity effects on rural productive activities can be <u>satisfactorily</u> avoided; and</p> <p>c) Avoid unplanned demand for provision of <u>public infrastructure investment</u>, including domestic water supply and waste disposal; and</p> <p>d) Avoid creating <u>significant</u> competing</p>	<ul style="list-style-type: none"> <li>The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> <li>The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				demand for water <del>or other</del> resources."	
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk</u> <del>harm</del> human health or the quality of the environment <del>in Otago</del> ".	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend c) as follows: "c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and".	No reason given.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Amend a) as follows: "a) Prior to subdivision or development of potentially contaminated land, <u>requiring</u> <del>ensuring</del> a site investigation is undertaken to determine the nature or extent of any contamination; and"	No reason given.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Amend as follows: "Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably degrade natural values</u> ".	<ul style="list-style-type: none"> <li>• Avoiding the creation of new contaminated land may not always be appropriate or practical: in remediating contaminated land it may be appropriate to move soil to another location depending on where it is situated and how that land is to be used.</li> <li>• The emphasis should be on avoiding risks to human health or the environment.</li> </ul>
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	<ul style="list-style-type: none"> <li>• Add the following objective: "Significant industry activities and physical resources are provided for".</li> <li>• Add the following policy: "Recognising and providing for significant industry activities and physical resources Recognising and providing for significant industry activities and physical resources, by: a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety; b) Protecting significant industry activities from inappropriate subdivision, use, and development; c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated."</li> <li>• Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to: a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and cultural well-being; b) Protect significant industry activities from inappropriate subdivision, use, and</li> </ul>	Regionally Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				development; c) Enable significant industry activities and development that does not have a significant adverse effect on the environment; d) Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance."	
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Amend	Amend as follows: " <del>Sometimes, e</del> Existing businesses may be placed at risk by pressure to change activities are susceptible to reverse sensitivity effects, particularly when land use changes to activities that may compete or conflict, creating reverse sensitivities."	No reason given.
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows: "Many natural and physical resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users."	No reason given.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend as follows: "Maintain and <del>where possible,</del> enhance public access to the natural environment, including to the coast, lakes, rivers and their margins, and areas of cultural or historic significance, unless restricting access is necessary to: ... b) Protect the <del>natural heritage and ecosystem</del> values of sensitive natural areas or habitats; or..."	No reason given.
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: " <u>Significant h</u> Historic heritage resources are recognised and contribute to the region's character and sense of identity".	No reason given.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: " <u>Manage historic heritage values to p</u> Protect <del>and enhance</del> the values of places and areas of historic heritage <u>from inappropriate development</u> , by: ... c) Avoiding <u>remedying or mitigating</u> adverse effects on those values which contribute to the area or place being of regional or national significance; and <del>d) Avoiding significant adverse effects on other values of areas and places of historic heritage; and</del> e) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> f) <del>Remediating, when adverse effects on other values cannot be avoided; and</del> g) <del>Mitigating when adverse effects on other values cannot be avoided or remediated; and</del> h) ..."	<ul style="list-style-type: none"> <li>• The PRPS does not correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows: <del>"Managing for rural</del> <u>Protecting regionally significant industry</u> activities <del>from inappropriate</del>	<ul style="list-style-type: none"> <li>• Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.</li> <li>• The PRPS is too focused on recognising and providing for the</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><del>subdivision, use and development</del>            Manage activities in rural areas, to support the region's economy and communities, by:</p> <p>a) Enabling <u>regionally significant industry activities</u>, <del>farming and other rural activities that support the rural economy</del>; and</p> <p>b) Minimising the loss of <u>regionally significant soils highly valued for their versatility for primary production</u>; and</p> <p>c) Restricting the establishment of activities <del>in rural areas</del> that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u>; and</p> <p>d) <del>Minimising</del> <u>Restricting</u> the subdivision of productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and</p> <p>e) Providing for other activities that have a functional need to locate in rural areas <del>including tourism and recreational activities that are of a nature and scale compatible with rural activities.</del>"</p>	primary production sector, with not enough recognition of and provision for the tourism sector.
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Amend	<p>Amend as follows:            "Recognising <u>and providing for</u> the values of Otago's central business districts            Recognise <u>and provide for</u> the values of Otago's central business districts, including as the primary focal point for social, cultural and economic activities within a community."</p>	No reason given.
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	<p>Amend as follows: "Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of <del>the Otago's</del> central business districts and support local commercial needs, by:</p> <p>a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and</p> <p>...</p> <p>c) Avoiding unplanned extension of commercial activities that has significant adverse effects on <del>the a</del> central business district, including on the efficient use of infrastructure, employment and services; and</p> <p>..."</p>	No reason given.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	<p>Amend as follows: "Manage the finite nature of land suitable and available for industrial activities, by:</p> <p>a) Providing specific areas to accommodate <del>the effects of</del> industrial activities; and</p> <p>b) Providing a range of land suitable for different industrial activities <del>including land extensive activities</del>; and</p> <p>c) Restricting the establishment of activities in industrial areas that may result in:</p> <p>i. Reverse sensitivity effects <u>on industrial activities</u>; or</p>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				ii. Inefficient use of industrial land or infrastructure."	
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend as follows: "Managing locational needs for mineral and gas exploration, extraction and processing Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Giving preference to avoiding their location in-</del> <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on :</u> i. ... b) Restricting the establishment of <del>these</del> activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities.</u> "	No reason given.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in-</del> ... e) <u>Assessing the significance of adverse effects on those values, as detailed in Schedule 3;</u> and, ... g) Considering the use of offsetting, or compensatory measures, <u>to address</u> <del>for</del> residual adverse effects <u>on the environment;</u> and ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values <del>only</del> when: a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and b) Those <u>adverse</u> effects cannot be avoided, remedied or mitigated; and c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."	<ul style="list-style-type: none"> <li>• The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection.</li> <li>• Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Amend as follows: " <u>Providing for</u> <del>Offsetting for</del> <u>from adverse effects on</u> indigenous biodiversity Provide for offsetting <del>for</del> <u>from adverse effects</u> on indigenous biodiversity, when <del>it is enabled,</del> <u>by ensuring that:</u> a) The offset achieves no net loss <del>and preferably a net gain</del> in indigenous biodiversity	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				values; and b) The offset is undertaken close to the location of development <del>where this will result in the best ecological outcome; and...</del>	
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	Add the following method: "1.1.4 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."	No reason given.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<ul style="list-style-type: none"> <li>Amend Method 1.2.1 as follows: "Identify <del>and protect from inappropriate subdivision, use and development</del> places, areas or landscapes of cultural, spiritual or traditional significance to them;"</li> <li>Amend Method 1.2.2 as follows: "Identify, and protect <del>from inappropriate subdivision, use and development</del> the values that contribute to their significance;"</li> <li>Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</li> </ul>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Oppose	Delete Method 1.4.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Oppose	Delete Method 2.2	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Oppose	Delete Method 2.3.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting <del>from inappropriate subdivision, use and development</del> , historic heritage places <del>or</del> areas <del>or</del> landscapes located in the beds of rivers, lakes and wetlands or the coastal marine area;"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.12.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7.	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>Unnecessary or ambiguous ("may").</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend Method 4.2.1 as follows: "City or district councils will implement Policies 3.2.2 and 3.2.3 <del>to the extent applicable</del> when	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				undertaking natural hazard assessments".	
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend Method 6.1.2 as follows: "Regional, city and district councils, in their areas of responsibility, will identify: ... d) <u>Special amenity landscapes;</u> ... g) <u>Regionally significant soil resources;</u> h) <u>Significant infrastructure;</u> "	<ul style="list-style-type: none"> <li>Concerned about introducing the term of Special Amenity Landscapes.</li> <li>Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> <li>Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. Too high a level of protection could have adverse effects on the economic and social wellbeing of communities.</li> <li>Significant infrastructure should be defined, recognised and provided for.</li> </ul>
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Oppose	Delete Method 7.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
211	Method 8 - Education and Information	Method 8.1.1 - Information from regional, district and city councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
214	Method 8 - Education and Information	Method 8.1.4 - Information from city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
215	Method 9 - Funding	Method 9 - Funding	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
220	Method 11 - Advocacy and Facilitation	Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional	Oppose	Delete Methods.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Amend d) as follows: "d) Facilitate coordination between <del>lifeline utilities - significant infrastructure and significant community facilities used</del> for emergency management, including by: i) Recognising the interconnections between <u>significant infrastructure, lifeline utilities;</u> ..."	No reason given.
225	Method 11 - Advocacy and Facilitation	Method 11.2.3 - Facilitation by regional, city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
248	Appendices	Appendices - general	Oppose	Delete Appendix 1.	<ul style="list-style-type: none"> <li>Duplicates the RMA or other statutory documents, including any</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS.</li> </ul>	<p>provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and</p> <ul style="list-style-type: none"> <li>Is not required by RMA S62 or is not an active directive.</li> </ul>
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>Add the following definitions: <ul style="list-style-type: none"> <li>Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance;</li> <li>Significant Community Facility - include facilities that provide essential community services; <ul style="list-style-type: none"> <li>Urban;</li> </ul> </li> <li>Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS;</li> <li>Regionally Significant Industry Activity - include any activity associated with tourism or primary production; <ul style="list-style-type: none"> <li>Hard mitigation measures;</li> </ul> </li> </ul> </li> <li>Amend definition of Kai Tahu to clarify if has the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning documents outside Otago.</li> </ul>	To reduce ambiguity and enable more efficient implementation of the PRPS.
250	Glossaries	Glossary of Te Reo terms	Oppose	Delete and include these terms in the Glossary.	Unnecessary to have 2 separate glossaries.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Delete or amend text that: <ul style="list-style-type: none"> <li>Is duplicated;</li> <li>Is vague or ambiguous;</li> <li>Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation;</li> <li>Is not required by RMA S62 or is not an active directive; and</li> <li>Delete all "need" statements.</li> </ul>	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>"Need" statements are not required by RMA S62 or is not an active directive.S</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	<ul style="list-style-type: none"> <li>Any consequential or other amendments required to give effect, or like effect, to any matter raised in the submission.</li> </ul>	No reason given.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	<ul style="list-style-type: none"> <li>Retention of all provisions as notified, except as requested in the submission.</li> </ul>	No reason given.
6	Overall approach	Schedule 3 - Significance threshold	Oppose	<ul style="list-style-type: none"> <li>Delete; or</li> <li>Amend so it is consistent with case law and insert new criteria to reflect the need to consider offsetting or compensation and to reflect environmental/planning context on a case-by-case basis, e.g.: <ul style="list-style-type: none"> <li>"11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly offset or otherwise compensated, and consequently reducing the significance of the effect.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>The S32 report does not evaluate Schedule 3.</li> <li>Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant.</li> <li>Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• 12. Environmental Context: The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</li> <li>• 13. Matters of national importance and national significance: The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA. The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS."</li> </ul>	
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Amend	Amend as follows: "The principles of Te Tiriti o Waitangi are <u>identified and</u> taken into account in resource management decisions".	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	<p>Amend as follows: "Policy 1.1.2 <u>Identifying and</u> <del>Faking</del> the principles of Te Tiriti o Waitangi into account</p> <p>Ensure that local authorities <del>exercise their functions and powers, to</del> <u>take into account the principles of Te Tiriti o Waitangi identified in Appendix 1A by:</u></p> <p>a) <u>Providing</u> <del>Accord</del> Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,</p> <p>b) <del>Involve</del> <u>Involving</u> Kai Tahu in resource management decision-making processes and implementation; and</p> <p>c) <del>Take</del> <u>Taking</u> into account Kai Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taoka ; and</p> <p>d) <del>Ensure</del> <u>Ensuring</u> Kai Tahu have the prerogative to:</p> <p>i. <del>Identify</del> <u>Identifying</u> their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and</p> <p>ii. <del>Determine</del> <u>Determining</u> how best to express that relationship; and</p> <p>e) <del>Ensure</del> <u>Ensuring</u> Kai Tahu are able to exercise kaitiakitaka; and</p> <p>f) <del>Ensure</del> <u>Ensuring</u> that district and regional plans:</p> <p>i. <del>Give</del> <u>Giving</u> effect to the Ngai Tahu Claims Settlement Act 1998; and</p> <p>ii. <del>Recognise</del> <u>Recognising</u> and <del>provide</del> <u>providing</u> for statutory acknowledgement areas, as detailed in Schedule 2; and</p> <p>iii. <del>Provide</del> <u>Providing</u> for other areas in Otago that are recognised as significant to Kai Tahu in a manner similar to that prescribed for statutory acknowledgement areas."</p>	Use wording of RMA Part 2.

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16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Objective 1.2 Kai Tahu values, rights and interests and customary resources are <u>identified and sustained</u> ."	No reason given.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) Ensuring <u>sustainable management of</u> resources supports <del>their</del> customary uses and cultural values (as detailed in Schedules 1A and B); and"	No reason given.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> , on those values and sites <del>as detailed in Schedule 3</del> ; and"	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<ul style="list-style-type: none"> <li>• Amend b) as follows: "b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and"</li> <li>• Delete c).</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Specify or identify "other cultural values" referred to in other parts of the RPS in Schedule 1A.	No reason given.
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	Amend Issue as follows: "Degradation of <u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time <del>will</del> <u>can</u> cause serious damage."	Regional issues include natural resource management issues.
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected <u>from inappropriate subdivision, use and development</u> ."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <del>Natural</del> <u>Environmental</u> systems <u>and resources</u> are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely affects the <u>environmental</u> value of another..."	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural <del>and physical</del> resources are recognised, <u>and protected from inappropriate subdivision, use and development</u> <del>maintained and enhanced</del> ."	<ul style="list-style-type: none"> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to: ... c) Protect <u>outstanding water bodies</u> and	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				wetlands <u>from inappropriate subdivision, use and development</u> ; and d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... j) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and k) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and l) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ... b) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and ... g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... g) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and h) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend b) as follows: "b)Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those</u> soils, to: ... f) <del>Retain</del> <u>Ensure the primary use of regionally significant soil resources is</u> for primary production <u>purposes</u> ; and g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u> ; and ..."	
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Amend c) iii. as follows: "iii. Historical <del>and heritage</del> - associations".	No reason given.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• As applies to all landscape assessments, including for "Special Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Add the following new policy: " <u>Managing cross boundary landscape effects</u> <u>Promote alignment of District Plans and integrated assessments of environmental effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries.</u> "	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries, which would benefit from a regionally integrated approach.</li> <li>• This proposed policy would be as effective as the provisions on Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: " <del>Protect and enhance</del> <u>Manage subdivision, use and development that affects</u> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects <del>on these values which contribute</del> <u>which will result in</u> to the area or habitat <u>losing its</u> <del>being</del> significant <u>status</u> ; and b) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on other values of the area or habitat; and <del>c) Assessing the significance of adverse effects on these values, as detailed in Schedule 3; and</del> ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes <del>, using the attributes as detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• These attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• Schedule 4 should be deleted</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: " <del>Protect, enhance and restore</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding natural features, landscapes and seascapes, by: a) Avoiding adverse effects <del>on these values which contribute to</del> <u>which will result in</u> the	<ul style="list-style-type: none"> <li>• Could disrupt the balance of the values of outstanding natural landscapes and features and other important values.</li> <li>• For example, ski fields are appropriate to locate in alpine environments that may be considered outstanding natural landscapes.</li> <li>• Ensuring such businesses can continue to operate and provide an important recreational and economic resource to Otago should be borne in mind.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>loss of the significance of the natural feature, landscape or seascape; and</p> <p>...</p> <p><del>e) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del></p> <p>...</p> <p><u>g) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values</u></p> <p><u>(h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate".</u></p>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding <del>using the attributes detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of different criteria being used in current or proposed district plans, and hence, creating inefficiencies and potentially slowing down forthcoming district plan reviews. These concerns also relation to Schedule 4.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social wellbeing of communities.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Amend as follows: " <del>Protect or enhance the values of: Manage special amenity landscapes and highly valued natural features, by:</del>	<ul style="list-style-type: none"> <li>• Level of protection not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it.</li> <li>• Better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category.</li> <li>• The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend as follows: "Preserve or enhance the natural character values of the coastal environment, by:	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				b) Avoiding significant adverse effects <u>and avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment</u> <del>on</del> those values which contribute to the high natural character values of an area; and c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and d) <u>Avoiding, remedying or mitigating other adverse effects on other values</u> ; and..."	
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend as follows: " <del>Protect</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding water bodies and wetlands by: a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> , including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and ... c) <u>Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</u> ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	Amend as follows: "Policy 2.2.14 Identifying <del>highly valued</del> <u>regionally significant</u> soil resources Identify areas and values of <del>highly valued</del> <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Amend as follows: "Policy 2.2.15 Managing <del>highly valued</del> <u>regionally significant</u> soil resources Protect the values of <del>areas of highly valued</del> <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on those values which contribute to the soil being <del>highly valued</del> <u>regionally significant</u> ; and ... c) <u>Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</u> d) Recognising that <u>loss of regionally significant soils to urban expansion development</u> may be appropriate <u>near</u> <del>due to</del> location and proximity to existing urban development <del>and infrastructure</del> <u>particularly when there is a lack of supply of land available for urban development</u> ."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend as follows: " <del>Natural resource s</del> Systems and their interdependencies are recognised"	No reason given.
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are	Amend	Add the following policy: " <u>Applying an integrated management approach for significant infrastructure and activities that</u>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		recognised		<u>affect significant infrastructure</u> <u>Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure, by:</u> a) <u>Promoting consistent corridor management throughout the region.</u> "	<ul style="list-style-type: none"> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>• Amend a) as follows: "a) Taking into account the impacts of management of one resource on the <u>environmental</u> values of another, or on the environment in general; and".</li> <li>• Add the following clauses: " <u>c) Ensuring that resource objectives are complementary across administrative boundaries; and</u> <u>d) Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units.</u> "</li> </ul>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete policy.	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
66	Objectives on resilience, health and safety	Issue 3.1 - Risk of overreaching the environment's carrying capacity	Amend	Amend as follows: "Activities that <u>utilise resources</u> <del>-are undertaken-</del> without regard to their <del>local-</del> <u>environmental values</u> <del>-are at greater risk inappropriately compromising -of overreaching that-</del> the environment's ability to sustain the activity."	No reason given.
70	Objectives on resilience, health and safety	Issue 3.5 - Importance of infrastructure of regional or national significance	Amend	Amend as follows: " <u>It is important to recognise and provide for Significant Infrastructure</u> <del>-of regional and national significance-</del> <u>even though it may result in local adverse environmental effects</u> <del>-impacts, or adversely affect other nationally important values-...</del> "	Significant infrastructure should be defined, recognised and provided for.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of <del>-natural and physical</del> resources recognises environmental constraints".	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising <del>-natural and physical</del> environmental constraints Recognise the <del>-natural and physical</del> environmental constraints of <u>resources</u> <del>-an area-</del> , the <u>environmental</u> effects of those constraints on activities <u>utilising those resources</u> , and the <u>environmental</u> effects of those activities on those constraints, <del>-including with particular recognition of :</del> ... c) The sensitivity of <del>-the natural and physical</del> resources to adverse effects from the proposed activity/land use; and ..."	No reason given.
79	Objectives on resilience, health	Objective 3.2 - Risk that natural	Amend	Amend Objective 3.2 as follows: " <u>Inappropriate</u>	Designing to a 100 year level may be appropriate, but it would often



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	and safety	hazards pose to Otago's communities are minimised		risk that natural hazards pose to Otago's communities are minimised"	not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities <del>including hazards of low likelihood and high consequence.</del> "	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows: "Manage natural hazard risk, <del>including</del> with particular regard to: a) The risk <del>they</del> posed, considering the likelihood and consequences of natural hazard events; and ..."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend 1st sentence as follows: "Assess activities <u>in areas known to be subject to an identified</u> <del>for</del> natural hazard risk, by considering:..."	No reason given.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Policy 3.2.6 Avoiding increased natural hazard risk <u>from inappropriate subdivision, use and development</u> Avoid <u>remedy or mitigate increased</u> <del>increasing</del> natural hazard risk <u>from inappropriate subdivision, use and development</u> , including by:..."	<ul style="list-style-type: none"> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• It would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).</li> </ul>
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend 1st sentence as follows: "Reduce existing natural hazard risk, <del>including particularly by</del> :"	No reason given.
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) There is significant <del>public or environmental</del> benefit in doing so; or b) The work relates to the functioning ability of <u>significant infrastructure, a lifeline utility, or facility used</u> for essential or emergency services <u>or a significant community facility</u> ."	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ... b) Designing infrastructure to take into account: ... iv. <del>Natural and physical</del> Resource constraints; and v. Effects on the values of natural and physical resources; and ... c) Managing urban growth <u>in a coordinated manner to ensure</u> : i. <del>Within areas that have</del> sufficient infrastructure <u>services are provided</u> <del>capacity</del> ; or ii. <del>Where infrastructure services can be upgraded or extended</del> efficiently and effectively ; and d) <del>Co-ordinating the design and development of</del>	<ul style="list-style-type: none"> <li>• Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community costs than benefits in high growth areas.</li> <li>• Regulation of the release of land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> </ul>

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				infrastructure with the staging of land use change, including with: i. Structural design and release of land for new urban development; or ii. Structural redesign and redevelopment within existing urban areas."	
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend as follows: "Manage infrastructure activities, to: ... b) <del>Reduce</del> Avoid, remedy or mitigate adverse effects of those activities, including cumulative adverse effects on <del>natural and physical</del> resources; and c) Support economic, social and community <del>needs</del> activities; and d) Improve efficiency of use of <del>natural</del> resources; and e) Protect infrastructure corridors <del>from inappropriate subdivision, uses and development</del> for infrastructure needs, now and for the future; and ... g) Protect the functioning of <u>significant infrastructure</u> , <del>lifeline utilities</del> and essential or emergency services."	Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend as follows: "Policy 3.4.3 Designing <del>lifeline utilities</del> <u>significant infrastructure</u> and facilities for essential or emergency services Design <del>lifeline utilities</del> <u>significant infrastructure</u> , and facilities for essential or emergency services, to:..."	No reason given.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	• Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, <del>lifeline utilities</del> , <u>significant infrastructure</u> , and essential and emergency services". • Delete d).	• The practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend as follows: " <u>Significant</u> Infrastructure of <del>national and regional significance</del> is <u>recognised and provided for</u> managed in a sustainable way."	Significant infrastructure should be defined, recognised and provided for.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend as follows: "Policy 3.5.1 <u>Recognising and providing for</u> national and regional- significance of infrastructure Recognise <u>and provide for</u> the <del>national and regional</del> significance of the following infrastructure: a) Renewable electricity generation facilities <del>where they supply the national electricity grid and local distribution network</del> ; and ... f) Structures for transportation by rail <u>and tourism activities</u> ."	• Significant infrastructure should be defined, recognised and provided for. • The PRPS does not give enough recognition of and provision for the tourism sector.
105	Infrastructure of national or	Policy 3.5.2 - Managing adverse	Amend	Amend as follows:	• Significant infrastructure should be defined, recognised and provided

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	regional significance	effects of infrastructure that has national or regional significance		"Policy 3.5.2 Managing adverse effects of <del>significant</del> infrastructure <del>that has national or regional significance</del> <del>Minimise</del> <u>Avoid, remedy or mitigate</u> adverse effects from <del>significant</del> infrastructure <del>that has national or regional significance</del> , by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in:</del> ... b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding</del> <u>minimising</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and ... <del>d) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> e) <del>Considering</del> <u>Enabling infrastructure providers to employ</u> the use of offsetting <del>or</del> other compensatory measures <u>to address</u> <del>for</del> residual adverse effects on <u>the environment indigenous biodiversity</u> ."	for. • Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32. • The practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	• Amend header as follows: "Protecting <del>significant</del> infrastructure <del>of national or regional significance</del> ". • Delete d).	• Significant infrastructure should be defined, recognised and provided for. • The practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	Amend as follows: "Policy 3.6.2 Promoting small <u>and community</u> scale renewable electricity generation Promote small <u>and community</u> scale renewable electricity generation activities that : a) <u>Increase the local community's resilience and security of energy supply;</u> and b) <u>Avoid, remedy or mitigate adverse effects from that activity.</u> "	No reason given.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	• Amend 1st sentence as follows: "Protect the generation capacity of <u>nationally or regionally significant</u> renewable electricity generation activities, by...". • Delete d).	• The practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	Amend as follows: • Delete d). • "e) Protecting <del>existing</del> distribution corridors for infrastructure needs, now and for the future."	• The practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	Amend as follows: "Encourage the use of good urban design principles in subdivision and development in urban areas <del>as detailed in Schedule 6</del> , to: ... b) Ensure that the built form relates well to its <del>surrounding natural</del> environment <del>including</del>	• Schedule 6 not assessed in S32 report. • Likely that will add to existing assessment requirements (urban design protocol & matters set out in District Plans) for little added benefits. • May be to the detriment of good urban design for specific sites.

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				by: i. <del>Reflecting natural features such as rivers, lakes, wetlands and topography; and</del> ii. <del>Providing for ecological corridors in urban areas; and</del> iii. <del>Protecting areas of indigenous biodiversity and habitat for indigenous fauna; and</del> iv. <del>Encouraging use of low impact design techniques; and</del> v. <del>Encouraging construction of warmer buildings ; and</del> ..."	
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend a) as follows: "a) <del>Maximising</del> <u>Optimising</u> passive solar gain; and"	No reason given.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend as follows: "Design <u>and maintain</u> public spaces, including streets and open spaces, to <u>provide for a range of uses and</u> meeting the reasonable access and mobility needs of all sectors within the community <del>including the young and those with mobility impairments.</del> "	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Amend as follows: "Policy 3.8.1 <del>Managing</del> <u>Providing</u> for urban growth <del>Manage</del> <u>Provide for</u> urban growth and creation of new urban land in a strategic and co-ordinated way, by: a) <u>Understanding demand and supply of</u> <del>Ensuring there is sufficient</del> residential, commercial and industrial <u>zoned</u> land capacity, <del>to</del> <u>and catering for that</u> demand <del>for such land, projected over at least the next 10 years;</del> and b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to: i. Provide infrastructure in an efficient and effective way; and ii. <del>Avoid</del> <u>Discouraging</u> additional costs <u>on the public</u> that arise from unplanned infrastructure expansion; and c) Identifying future growth areas that: i. Minimise <u>significant</u> adverse effects on <del>rural the productivity of the rural and tourism sectors,</del> <u>including loss of highly valued soils or creating competing urban demand for water and other resources;</u> and ii. <u>Can be developed without resulting in significant adverse effects on any matter of national importance or national significance</u> <del>Maintain or enhance significant biodiversity, landscape or natural character values ; and</del>	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community.</li> <li>• Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS.</li> <li>• "Considering the need for urban growth boundaries" should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential methods.</li> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added</li> </ul>

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				<p><del>iii. Maintain important cultural or heritage values; and</del>  <del>iv. iii. Avoid land with significant risk from natural hazards which cannot be remedied or mitigated; and</del>  d) Considering the need for urban growth boundaries to control <u>potentially inappropriate</u> urban expansion; and  e) Ensuring efficient use of land; and  f) Requiring the use of low or no-emission heating systems in buildings, <del>when</del> <u>where</u> ambient air quality <del>in or near the growth area</del> is:  i. Below standards for human health; or  ii. Vulnerable to degradation given the local climatic and geographical context; and  g) Giving effect to the principles of good urban design <del>, as detailed in Schedule 6;</del> and  h) Giving effect to the principles of crime prevention through environmental design</p>	<p>benefits.  • May be to the detriment of good urban design for specific sites.</p>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	Delete the policy.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend as follows: "Manage subdivision, use and development of rural land, to: a) Avoid <u>inappropriate</u> development or fragmentation of land <u>particularly</u> which undermines or forecloses the potential of rural land: i. For primary production <u>or tourism</u> ; or ... b) Have particular regard to whether the proposal will result in a loss of the productive potential of <u>regionally significant, highly versatile</u> soils, unless: i. The land adjoins an existing urban area and there is no other land suitable for urban expansion <u>, or there is a shortage of land available for urban development</u> ; and ii. <del>There highly versatile soils are needed for urban expansion,</del> any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and iii. reverse sensitivity effects on rural productive activities can be <u>satisfactorily</u> avoided; and c) Avoid unplanned demand for provision of <u>public infrastructure investment</u> , including domestic water supply and waste disposal; and d) Avoid creating <u>significant</u> competing demand for water <del>or other</del> resources."	are as defined in a District Plan. • The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector. • The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. • Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk</u> <del>harm</del> human health or the quality of the environment <del>in Otago</del> ".	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend c) as follows: "c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and".	No reason given.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Amend a) as follows: "a) Prior to subdivision or development of potentially contaminated land, <u>requiring</u> <del>ensuring</del> a site investigation is undertaken to determine the nature or extent of any contamination; and"	No reason given.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Amend as follows: "Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably degrade natural values</u> ".	• Avoiding the creation of new contaminated land may not always be appropriate or practical: in remediating contaminated land it may be appropriate to move soil to another location depending on where it is situated and how that land is to be used. • The emphasis should be on avoiding risks to human health or the environment.
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	• Add the following objective: "Significant industry activities and physical resources are provided for". • Add the following policy: "Recognising and providing for significant industry activities and physical resources	Regionally Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.

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				<p>Recognising and providing for significant industry activities and physical resources, by:</p> <p>a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety;</p> <p>b) Protecting significant industry activities from inappropriate subdivision, use, and development;</p> <p>c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated."</p> <p>• Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to:</p> <p>a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and cultural well-being;</p> <p>b) Protect significant industry activities from inappropriate subdivision, use, and development;</p> <p>c) Enable significant industry activities and development that does not have a significant adverse effect on the environment;</p> <p>d) Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance."</p>	
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Amend	Amend as follows: " <del>Sometimes, existing businesses may be placed at risk by pressure to change - activities are susceptible to reverse sensitivity effects, particularly when land use changes - to activities that may compete or conflict, creating reverse sensitivities.</del> "	No reason given.
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows: "Many <del>natural and physical</del> resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users."	No reason given.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend as follows: "Maintain and <del>where possible,</del> enhance public access to the natural environment, including to the coast, lakes, rivers and their margins, and areas of cultural or historic significance, unless restricting access is necessary to: ... b) Protect the <del>natural heritage and ecosystem</del> values of sensitive natural areas or habitats;	No reason given.

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147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: " <del>Significant h</del> Historic heritage resources are recognised and contribute to the region's character and sense of identity".	No reason given.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: " <del>Manage historic heritage values to p</del> Protect and enhance the values of places and areas of historic heritage <del>from inappropriate development</del> , by: ... c) Avoiding <del>remedying or mitigating</del> adverse effects on those values which contribute to the area or place being of regional or national significance; and -d) Avoiding significant adverse effects on other values of areas and places of historic heritage; and e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and f) Remediating, when adverse effects on other values cannot be avoided; and g) Mitigating when adverse effects on other values cannot be avoided or remediated; and h) ..."	<ul style="list-style-type: none"> <li>• The PRPS does not correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows: " <del>Managing for rural</del> <u>Protecting regionally significant industry activities from inappropriate subdivision, use and development</u> Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling <u>regionally significant industry activities</u> <del>, farming and other rural activities that support the rural economy</del> ; and b) Minimising the loss of <u>regionally significant soils</u> <del>highly valued for their versatility for primary production</del> ; and c) Restricting the establishment of activities <del>in rural areas</del> that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u> ; and d) <del>Minimising</del> <u>Restricting</u> the subdivision of productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and e) Providing for other activities that have a functional need to locate in rural areas <del>, including tourism and recreational activities that are of a nature and scale compatible with rural activities</del> ."	<ul style="list-style-type: none"> <li>• Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.</li> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> </ul>
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Amend	Amend as follows: "Recognising <u>and providing for</u> the values of Otago's central business districts Recognise <u>and provide for</u> the values of Otago's central business districts, including as the primary focal point for social, cultural and economic activities within a community."	No reason given.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	Amend as follows: "Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of <del>the</del> <u>Otago's</u> central business districts and support local commercial needs, by: a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and ... c) Avoiding unplanned extension of commercial activities that has significant adverse effects on <del>the</del> <u>a</u> central business district, including on the efficient use of infrastructure, employment and services; and ..."	No reason given.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	Amend as follows: "Manage the finite nature of land suitable and available for industrial activities, by: a) Providing specific areas to accommodate <del>the effects of</del> industrial activities; and b) Providing a range of land suitable for different industrial activities <del>, including land extensive activities</del> ; and c) Restricting the establishment of activities in industrial areas that may result in: i. Reverse sensitivity effects <u>on industrial activities</u> ; or ii. Inefficient use of industrial land or infrastructure."	No reason given.
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend as follows: "Managing locational needs for mineral and gas exploration, extraction and processing Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Giving preference to avoiding their location in</del> <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> : i. .... b) Restricting the establishment of <del>those</del> activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities</u> ."	No reason given.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in</del> : ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and;</p> <p>...</p> <p>g) Considering the use of offsetting, or compensatory measures, <u>to address</u> <del>for</del> residual adverse effects <u>on the environment</u>; and</p> <p>..."</p>	
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	<p>Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values <del>only</del> when:</p> <p>a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and</p> <p>b) Those <u>adverse</u> effects cannot be avoided, remedied or mitigated; and</p> <p>c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."</p>	<ul style="list-style-type: none"> <li>The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection.</li> <li>Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	<p>Amend as follows:</p> <p><del>"Providing for o</del>Offsetting <del>for</del> <u>from adverse effects on</u> indigenous biodiversity</p> <p>Provide for offsetting <del>for</del> <u>from adverse effects</u> on indigenous biodiversity, when <del>it is enabled</del>, by ensuring that:</p> <p>a) The offset achieves no net loss <del>and preferably a net gain</del> in indigenous biodiversity values; and</p> <p>b) The offset is undertaken close to the location of development <del>, where this will result in the best ecological outcome</del>; and..."</p>	No reason given.
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	Add the following method: "1.1.4 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."	No reason given.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<ul style="list-style-type: none"> <li>Amend Method 1.2.1 as follows: "Identify <del>and protect</del> <u>from inappropriate subdivision, use and development</u>, places, areas or landscapes of cultural, spiritual or traditional significance to them;"</li> <li>Amend Method 1.2.2 as follows: "Identify, and protect <del>from inappropriate subdivision, use and development</del>, the values that contribute to their significance;"</li> <li>Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</li> </ul>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Oppose	Delete Method 1.4.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Oppose	Delete Method 2.2	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
187	Method 2 - Regional, City and	Method 2.3 - Regional rule for	Oppose	Delete Method 2.3.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	District Council Relationships	extinguishing existing use rights			<ul style="list-style-type: none"> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting <u>from inappropriate subdivision, use and development</u> , historic heritage places <u>or</u> areas <del>or landscapes</del> located in the beds of rivers, lakes and wetlands or the coastal marine area;"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.12.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7.	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>Unnecessary or ambiguous ("may").</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend Method 4.2.1 as follows: "City or district councils will implement Policies 3.2.2 and 3.2.3 <u>to the extent applicable</u> when undertaking natural hazard assessments".	No reason given.
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend Method 6.1.2 as follows: "Regional, city and district councils, in their areas of responsibility, will identify: ... <del>d) Special amenity landscapes;</del> ... <u>g) Regionally significant soil resources;</u> <u>h) Significant infrastructure;</u> "	<ul style="list-style-type: none"> <li>Concerned about introducing the term of Special Amenity Landscapes.</li> <li>Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> <li>Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. Too high a level of protection could have adverse effects on the economic and social wellbeing of communities.</li> <li>Significant infrastructure should be defined, recognised and provided</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Oppose	Delete Method 7.	for. <ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
211	Method 8 - Education and Information	Method 8.1.1 - Information from regional, district and city councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
214	Method 8 - Education and Information	Method 8.1.4 - Information from city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
215	Method 9 - Funding	Method 9 - Funding	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
220	Method 11 - Advocacy and Facilitation	Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional	Oppose	Delete Methods.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Amend d) as follows: "d) Facilitate coordination between <del>lifeline utilities - significant infrastructure and significant community facilities used</del> for emergency management, including by: i) Recognising the interconnections between <del>significant infrastructure - lifeline utilities;...</del> "	No reason given.
225	Method 11 - Advocacy and Facilitation	Method 11.2.3 - Facilitation by regional, city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
248	Appendices	Appendices - general	Oppose	<ul style="list-style-type: none"> <li>• Delete Appendix 1.</li> <li>• Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS.</li> </ul>	<ul style="list-style-type: none"> <li>• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and</li> <li>• Is not required by RMA S62 or is not an active directive.</li> </ul>
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>• Add the following definitions:               <ul style="list-style-type: none"> <li>• Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance;</li> <li>• Significant Community Facility - include facilities that provide essential community services;                   <ul style="list-style-type: none"> <li>• Urban;</li> <li>• Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS;</li> <li>• Regionally Significant Industry Activity - include any activity associated with tourism or primary production;</li> <li>• Hard mitigation measures;</li> </ul> </li> <li>• Amend definition of Kai Tahu to clarify if has the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning documents outside Otago.</li> </ul> </li> </ul>	To reduce ambiguity and enable more efficient implementation of the PRPS.
250	Glossaries	Glossary of Te Reo terms	Oppose	Delete and include these terms in the Glossary.	Unnecessary to have 2 separate glossaries.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Delete or amend text that: <ul style="list-style-type: none"> <li>• Is duplicated;</li> <li>• Is vague or ambiguous;</li> </ul>	<ul style="list-style-type: none"> <li>• Efficiency gains in removing unnecessary provisions.</li> <li>• Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> </ul>

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				<ul style="list-style-type: none"> <li>• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation;</li> <li>• Is not required by RMA S62 or is not an active directive; and</li> <li>• Delete all "need" statements.</li> </ul>	<ul style="list-style-type: none"> <li>• "Need" statements are not required by RMA S62 or is not an active directive.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	<ul style="list-style-type: none"> <li>• Any consequential or other amendments required to give effect, or like effect, to any matter raised in the submission.</li> </ul>	No reason given.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	<ul style="list-style-type: none"> <li>• Retention of all provisions as notified, except as requested in the submission.</li> </ul>	No reason given.
6	Overall approach	Schedule 3 - Significance threshold	Oppose	<ul style="list-style-type: none"> <li>• Delete; or</li> <li>• Amend so it is consistent with case law and insert new criteria to reflect the need to consider offsetting or compensation and to reflect environmental/planning context on a case-by-case basis, e.g.: <ul style="list-style-type: none"> <li>"• 11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly offset or otherwise compensated, and consequently reducing the significance of the effect.</li> <li>• 12. Environmental Context: The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</li> <li>• 13. Matters of national importance and national significance: The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA. The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS."</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• The S32 report does not evaluate Schedule 3.</li> <li>• Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant.</li> <li>• Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.</li> </ul>
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Amend	Amend as follows: "The principles of Te Tiriti o Waitangi are <u>identified and</u> taken into account in resource management decisions".	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	Amend as follows: "Policy 1.1.2 <u>Identifying and</u> taking the principles of Te Tiriti o Waitangi into account Ensure that local authorities <del>exercise their functions and powers, to</del> <u>take into account the principles of Te Tiriti o Waitangi identified in Appendix 1A by:</u> a) <u>Providing</u> <del>Accord</del> Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and, b) <del>Involve</del> <u>Involving</u> Kai Tahu in resource	Use wording of RMA Part 2.

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				management decision-making processes and implementation; and c) <del>Take</del> <u>Taking</u> into account Kai Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taoka; and d) <del>Ensure</del> <u>Ensuring</u> Kai Tahu have the prerogative to: i. <del>Identify</del> <u>Identifying</u> their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and ii. <del>Determine</del> <u>Determining</u> how best to express that relationship; and e) <del>Ensure</del> <u>Ensuring</u> Kai Tahu are able to exercise kaitiakitaka; and f) <del>Ensure</del> <u>Ensuring</u> that district and regional plans: i. <del>Give</del> <u>Giving</u> effect to the Ngai Tahu Claims Settlement Act 1998; and ii. <del>Recognise</del> <u>Recognising</u> and <del>provide</del> <u>providing</u> for statutory acknowledgement areas, as detailed in Schedule 2; and iii. <del>Provide</del> <u>Providing</u> for other areas in Otago that are recognised as significant to Kai Tahu in a manner similar to that prescribed for statutory acknowledgement areas."	
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Objective 1.2 Kai Tahu values, rights and interests and customary resources are <u>identified and</u> sustained."	No reason given.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) Ensuring <u>sustainable management of</u> resources supports <del>their</del> customary uses and cultural values (as detailed in Schedules 1A and B); and"	No reason given.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> on those values and sites <del>as detailed in Schedule 3</del> ; and"	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<ul style="list-style-type: none"> <li>• Amend b) as follows: "b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and"</li> <li>• Delete c).</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Specify or identify "other cultural values" referred to in other parts of the RPS in Schedule 1A.	No reason given.
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	Amend Issue as follows: "Degradation of <u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the	Regional issues include natural resource management issues.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time <del>will</del> <u>can</u> cause serious damage."	
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected <u>from inappropriate subdivision, use and development</u> ."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <del>Natural</del> <u>Environmental</u> systems <u>and resources</u> are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely affects the <u>environmental</u> value of another..."	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural <del>and physical</del> resources are recognised, <u>and protected from inappropriate subdivision, use and development</u> , <del>maintained and enhanced</del> ."	<ul style="list-style-type: none"> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to: ... c) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... j) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and k) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and l) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ... b) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and ... g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... g) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and h) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend b) as follows: "b)Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those soils</u> , to: ... f) <del>Retain</del> <u>Ensure the primary use of regionally significant soil resources is for primary production purposes</u> ; and g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and ... k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Amend c) iii. as follows: "iii. Historical <del>and heritage</del> associations".	No reason given.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• As applies to all landscape assessments, including for "Special Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Add the following new policy: <u>"Managing cross boundary landscape effects Promote alignment of District Plans and integrated assessments of environmental</u>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries, which would benefit from a regionally integrated approach.</li> <li>• This proposed policy would be as effective as the provisions on</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<u>effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries.</u> "	Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters.
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: " <del>Protect and enhance</del> <u>Manage subdivision, use and development that affects</u> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects <del>on those values which contribute</del> <u>which will result in</u> to the area or habitat <del>losing its being</del> <u>significant status</u> ; and b) Avoiding significant adverse effects <del>from inappropriate subdivision, use and development on other values of the area or habitat; and</del> <del>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes <del>, using the attributes as detailed in Schedule 4.</del> ."	<ul style="list-style-type: none"> <li>• These attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• Schedule 4 should be deleted</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: " <del>Protect, enhance and restore.</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding natural features, landscapes and seascapes, by: a) Avoiding adverse effects <del>on those values which contribute to</del> <u>which will result in</u> the <del>loss of the</del> <u>significance of the</u> natural feature, landscape or seascape; and ... <del>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> ... ... <u>g) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values</u> <u>(h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate</u> ."	<ul style="list-style-type: none"> <li>• Could disrupt the balance of the values of outstanding natural landscapes and features and other important values.</li> <li>• For example, ski fields are appropriate to locate in alpine environments that may be considered outstanding natural landscapes.</li> <li>• Ensuring such businesses can continue to operate and provide an important recreational and economic resource to Otago should be borne in mind.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding <del>, using the attributes detailed in Schedule 4.</del> ."	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of different criteria being used in current or proposed district plans, and hence, creating inefficiencies and potentially slowing down forthcoming district plan reviews. These concerns also relation to Schedule 4.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social</li> </ul>

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48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Amend as follows: " <del>Protect or enhance the values of. <u>Manage</u> special amenity landscapes and highly valued natural features, by:</del> a) <del>Avoiding, <u>remediating or mitigating</u> significant</del> adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and <del>b) Avoiding, <u>remediating or mitigating</u> other adverse effects on other values; and</del> c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> ... <u>d) Recognising and providing for the use of such resources including as places where productive activities, tourism, recreation, infrastructure, homes and work places are located.</u> e) <u>Allowing values to adapt over time as communities and economies change.</u> "	wellbeing of communities. <ul style="list-style-type: none"> <li>Level of protection not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it.</li> <li>Better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment.</li> <li>Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category.</li> <li>The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely affected.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend as follows: "Preserve or enhance the natural character values of the coastal environment, by: a) <u>Avoiding adverse effects of activities on natural character in areas of the coastal environment with</u> <del>on those values which contribute to the</del> outstanding natural character of an area; and b) <u>Avoiding significant adverse effects and avoiding, <u>remediating or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment</u></u> <del>on those values which contribute to the high natural character values of an area; and</del> c) <u>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</u> d) <u>Avoiding, <u>remediating or mitigating other adverse effects on other values</u>; and...</u> "	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend as follows: " <del>Protect. <u>Manage</u> subdivision, use and development that affects the values of outstanding water bodies and wetlands by:</del> a) <u>Avoiding significant adverse effects from inappropriate subdivision, use and development</u> , including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and ... c) <u>Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</u> ..."	<ul style="list-style-type: none"> <li>Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	Amend as follows: "Policy 2.2.14 Identifying <del>highly valued</del> <u>regionally significant</u> soil resources Identify areas and values of <del>highly valued</del>	No reason given.

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				regionally significant soil resources, using the following criteria: ..."	
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Amend as follows: "Policy 2.2.15 Managing <del>highly valued</del> <u>regionally significant</u> soil resources Protect the values of <del>areas of highly valued</del> <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on those values which contribute to the soil being <del>highly valued</del> <u>regionally significant</u> ; and ... -e) <del>Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del> d) Recognising that <u>loss of regionally significant soils to urban expansion development</u> may be appropriate <u>near</u> <del>due to location and proximity to</del> existing urban development <del>and infrastructure</del> <u>particularly when there is a lack of supply of land available for urban development</u> ."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend as follows: " <del>Natural resource s</del> Systems and their interdependencies are recognised"	No reason given.
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Add the following policy: " <u>Applying an integrated management approach for significant infrastructure and activities that affect significant infrastructure</u> <u>Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure, by:</u> a) <u>Promoting consistent corridor management throughout the region.</u> "	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>• Amend a) as follows: "a) Taking into account the impacts of management of one resource on the <u>environmental</u> values of another, or on the environment in general; and"</li> <li>• Add the following clauses: "<u>c) Ensuring that resource objectives are complementary across administrative boundaries; and</u> <u>d) Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units.</u>"</li> </ul>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete policy.	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>• Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
66	Objectives on resilience, health and safety	Issue 3.1 - Risk of overreaching the environment's carrying capacity	Amend	Amend as follows: "Activities that <u>utilise resources</u> <del>are undertaken</del> without regard to <del>their local</del> environmental values <del>are at greater</del>	No reason given.

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				risk <del>inappropriately compromising</del> <del>of</del> <del>overreaching that</del> <del>the</del> environment's ability to sustain the activity."	
70	Objectives on resilience, health and safety	Issue 3.5 - Importance of infrastructure of regional or national significance	Amend	Amend as follows: " <u>It is important to recognise and provide for Significant Infrastructure of regional and national significance even though it may result in local adverse environmental effects impacts, or adversely affect other nationally important values...</u> "	Significant infrastructure should be defined, recognised and provided for.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of <del>natural and physical</del> resources recognises environmental constraints".	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising <del>natural and physical</del> environmental constraints Recognise the <del>natural and physical</del> environmental constraints of <u>resources</u> <del>an</del> <u>area</u> , the <u>environmental</u> effects of those constraints on activities <u>utilising those resources</u> , and the <u>environmental</u> effects of those activities on those constraints, <del>including</del> <u>with particular recognition of</u> : ... c) The sensitivity of <del>the natural and physical</del> resources to adverse effects from the proposed activity/land use; and ..."	No reason given.
79	Objectives on resilience, health and safety	Objective 3.2 - Risk that natural hazards pose to Otago's communities are minimised	Amend	Amend Objective 3.2 as follows: " <del>Inappropriate</del> risk that natural hazards pose to Otago's communities are minimised"	Designing to a 100 year level may be appropriate, but it would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities ; <del>including hazards of low likelihood and high consequence.</del> "	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows: "Manage natural hazard risk, <del>including</del> with <u>particular</u> regard to: a) The risk <del>they</del> posed, considering the likelihood and consequences of natural hazard events; and ..."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend 1st sentence as follows: "Assess activities <u>in areas known to be subject to an identified</u> <del>for</del> natural hazard risk, by considering:..."	No reason given.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Policy 3.2.6 Avoiding increased natural hazard risk <u>from inappropriate subdivision, use and development</u> Avoid <u>remedy or mitigate increased</u> <del>increasing</del> natural hazard risk <u>from inappropriate subdivision, use and development</u> <del>including by:...</del> "	<ul style="list-style-type: none"> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• It would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).</li> </ul>
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend 1st sentence as follows: "Reduce existing natural hazard risk, <del>including</del> "	No reason given.

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91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) There is significant <del>public or environmental</del> benefit in doing so; or b) The work relates to the functioning ability of <u>significant infrastructure, a lifeline utility, or facility used for essential or emergency services, or a significant community facility.</u> "	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ... b) Designing infrastructure to take into account: ... iv. <del>Natural and physical</del> Resource constraints; and v. Effects on the values of natural and physical resources; and ... c) Managing urban growth <u>in a coordinated manner to ensure</u> : i. <del>Within areas that have</del> sufficient infrastructure <u>services are provided</u> <del>capacity</del> ; or ii. <del>Where infrastructure services can be upgraded or extended</del> efficiently and effectively ; and d) <del>Co-ordinating the design and development of infrastructure with the staging of land use change, including with:</del> i. <del>Structural design and release of land for new urban development;</del> or ii. <del>Structural redesign and redevelopment within existing urban areas.</del> "	<ul style="list-style-type: none"> <li>• Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community costs than benefits in high growth areas.</li> <li>• Regulation of the release of land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend as follows: "Manage infrastructure activities, to: ... b) <del>Reduce</del> <u>Avoid, remedy or mitigate</u> adverse effects of those activities, including cumulative adverse effects on <del>natural and physical</del> resources; and c) Support economic, social and community <u>needs</u> <del>activities</del> ; and d) Improve efficiency of use of <del>natural</del> resources; and e) Protect infrastructure corridors <u>from inappropriate subdivision, uses and development</u> <del>for infrastructure needs, now and for the future</del> ; and ... g) Protect the functioning of <u>significant infrastructure</u> <del>lifeline utilities</del> and essential or emergency services."	Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential	Amend	Amend as follows: "Policy 3.4.3 Designing <del>lifeline utilities</del>	No reason given.

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		or emergency services		<u>significant infrastructure</u> and facilities for essential or emergency services Design <del>lifeline utilities</del> <u>significant infrastructure</u> , and facilities for essential or emergency services, to:.."	
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, <del>lifeline utilities</del>, <u>significant infrastructure</u>, and essential and emergency services".</li> <li>Delete d).</li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend as follows: " <u>Significant</u> Infrastructure of national and regional significance <del>is recognised and provided for</del> <u>managed in a sustainable way</u> ."	Significant infrastructure should be defined, recognised and provided for.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend as follows: "Policy 3.5.1 Recognising <u>and providing for</u> national and regional significance of infrastructure Recognise <u>and provide for</u> the national and regional significance of the following infrastructure: a) Renewable electricity generation facilities <del>where they supply the national electricity grid and local distribution network</del> ; and ... f) Structures for transportation by rail <u>and tourism activities</u> ."	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>The PRPS does not give enough recognition of and provision for the tourism sector.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Amend as follows: "Policy 3.5.2 Managing adverse effects of <u>significant infrastructure that has national or regional significance</u> <del>Minimise</del> <u>Avoid, remedy or mitigate</u> adverse effects from <u>significant infrastructure that has national or regional significance</u> , by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in</del> : ... b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding</del> <u>minimising</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and ... d) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> e) <del>Considering</del> <u>Enabling infrastructure providers to employ</u> the use of offsetting <del>or</del> other compensatory measures <u>to address</u> <del>for</del> residual adverse effects on <u>the environment indigenous biodiversity</u> ."	<ul style="list-style-type: none"> <li>Significant infrastructure should be defined, recognised and provided for.</li> <li>Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or	Amend	<ul style="list-style-type: none"> <li>Amend header as follows: "Protecting <u>significant infrastructure of national or regional</u></li> </ul>	Significant infrastructure should be defined, recognised and provided for.

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		regional significance		significance". • Delete d).	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	Amend as follows: "Policy 3.6.2 Promoting small <u>and community</u> scale renewable electricity generation Promote small <u>and community</u> scale renewable electricity generation activities that : a) <del>Increase the local community's resilience and security of energy supply;</del> and b) <del>Avoid, remedy or mitigate adverse effects from that activity."</del>	No reason given.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	• Amend 1st sentence as follows: "Protect the generation capacity of <u>nationally or regionally significant</u> renewable electricity generation activities, by..." • Delete d).	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	Amend as follows: • Delete d). • "e) Protecting <del>existing</del> distribution corridors for infrastructure needs, now and for the future."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	Amend as follows: "Encourage the use of good urban design principles in subdivision and development in urban areas <del>as detailed in Schedule 6</del> , to: ... b) Ensure that the built form relates well to its <u>surrounding natural</u> environment <del>including by:</del> i. <del>Reflecting natural features such as rivers, lakes, wetlands and topography;</del> and ii. <del>Providing for ecological corridors in urban areas;</del> and iii. <del>Protecting areas of indigenous biodiversity and habitat for indigenous fauna;</del> and iv. <del>Encouraging use of low impact design techniques;</del> and v. <del>Encouraging construction of warmer buildings</del> ; and ..."	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend a) as follows: "a) <del>Maximising</del> <u>Optimising</u> passive solar gain; and"	No reason given.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend as follows: "Design <u>and maintain</u> public spaces, including streets and open spaces, to <u>provide for a range of uses and</u> meeting the reasonable access and mobility needs of all sectors within the community <del>including the young and those with mobility impairments</del> ."	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Amend as follows: "Policy 3.8.1 <del>Managing</del> <u>Providing</u> for urban	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>growth</p> <p><del>Manage</del> <u>Provide for</u> urban growth and creation of new urban land in a strategic and co-ordinated way, by:</p> <p>a) <del>Understanding demand and supply of</del> <u>Ensuring there is sufficient</u> residential, commercial and industrial <u>zoned</u> land capacity, <del>to and catering for that demand for such land, projected over at least the next 10 years;</del> and</p> <p>b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to:</p> <p>i. Provide infrastructure in an efficient and effective way; and</p> <p>ii. <del>Avoid</del> <u>Discouraging</u> additional costs <u>on the public</u> that arise from unplanned infrastructure expansion; and</p> <p>c) Identifying future growth areas that:</p> <p>i. Minimise <u>significant</u> adverse effects on <del>rural</del> <u>the productivity of the rural and tourism sectors</u>, <del>including loss of highly valued soils or creating competing urban demand for water and other resources;</del> and</p> <p>ii. <u>Can be developed without resulting in significant adverse effects on any matter of national importance or national significance</u> <u>Maintain or enhance significant biodiversity, landscape or natural character values;</u> and <u>iii. Maintain important cultural or heritage values;</u> and</p> <p><del>iv-</del> <u>iii.</u> Avoid land with significant risk from natural hazards <u>which cannot be remedied or mitigated</u>; and</p> <p>d) Considering the need for urban growth boundaries to control <u>potentially inappropriate</u> urban expansion; and</p> <p>e) Ensuring efficient use of land; and</p> <p>f) Requiring the use of low or no-emission heating systems in buildings, <del>when</del> <u>where</u> ambient air quality <del>in or near the growth area</del> is:</p> <p>i. Below standards for human health; or</p> <p>ii. Vulnerable to degradation given the local climatic and geographical context; and</p> <p>g) Giving effect to the principles of good urban design <del>as detailed in Schedule 6;</del> and</p> <p>h) Giving effect to the principles of crime prevention through environmental design</p>	<ul style="list-style-type: none"> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• The rationale for “10 years” of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community.</li> <li>• Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS.</li> <li>• “Considering the need for urban growth boundaries” should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential methods.</li> <li>• “Avoidance” of natural hazards needs to be widened to “avoid, remedy or mitigate”, which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	Delete the policy.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The PRPS does not adequately address the issue of the shortage of</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<p>zoned land supply, particularly in Queenstown.</p> <ul style="list-style-type: none"> <li>Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<p>Amend as follows: "Manage subdivision, use and development of rural land, to:</p> <p>a) Avoid <u>inappropriate</u> development or fragmentation of land <u>, particularly</u> which undermines or forecloses the potential of rural land:</p> <p>i. For primary production <u>or tourism</u>; or</p> <p>...</p> <p>b) Have particular regard to whether the proposal will result in a loss of the productive potential of <u>regionally significant</u> <del>highly versatile</del> soils, unless:</p> <p>i. The land adjoins an existing urban area and there is no other land suitable for urban expansion <u>, or there is a shortage of land available for urban development</u>; and</p> <p>ii. <del>There highly versatile soils are needed for urban expansion,</del> any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and</p> <p>iii. reverse sensitivity effects on rural productive activities can be <u>satisfactorily</u> avoided; and</p> <p>c) Avoid unplanned demand for provision of <u>public infrastructure investment</u>, including domestic water supply and waste disposal; and</p> <p>d) Avoid creating <u>significant</u> competing</p>	<ul style="list-style-type: none"> <li>The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> <li>The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				demand for water <del>or other</del> resources."	
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk</u> <del>harm</del> human health or the quality of the environment <del>in Otago</del> ".	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend c) as follows: "c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and".	No reason given.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Amend a) as follows: "a) Prior to subdivision or development of potentially contaminated land, <u>requiring</u> <del>ensuring</del> a site investigation is undertaken to determine the nature or extent of any contamination; and"	No reason given.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Amend as follows: "Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably degrade natural values</u> ".	<ul style="list-style-type: none"> <li>• Avoiding the creation of new contaminated land may not always be appropriate or practical: in remediating contaminated land it may be appropriate to move soil to another location depending on where it is situated and how that land is to be used.</li> <li>• The emphasis should be on avoiding risks to human health or the environment.</li> </ul>
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	<ul style="list-style-type: none"> <li>• Add the following objective: "Significant industry activities and physical resources are provided for".</li> <li>• Add the following policy: "Recognising and providing for significant industry activities and physical resources Recognising and providing for significant industry activities and physical resources, by: a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety; b) Protecting significant industry activities from inappropriate subdivision, use, and development; c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated."</li> <li>• Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to: a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and cultural well-being; b) Protect significant industry activities from inappropriate subdivision, use, and</li> </ul>	Regionally Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				development; c) Enable significant industry activities and development that does not have a significant adverse effect on the environment; d) Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance."	
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Amend	Amend as follows: " <del>Sometimes, e</del> Existing businesses may be placed at risk by pressure to change activities are susceptible to reverse sensitivity effects, particularly when land use changes to activities that may compete or conflict, creating reverse sensitivities."	No reason given.
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows: "Many natural and physical resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users."	No reason given.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend as follows: "Maintain and <del>where possible,</del> enhance public access to the natural environment, including to the coast, lakes, rivers and their margins, and areas of cultural or historic significance, unless restricting access is necessary to: ... b) Protect the <del>natural heritage and ecosystem</del> values of sensitive natural areas or habitats; or..."	No reason given.
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: " <u>Significant h</u> Historic heritage resources are recognised and contribute to the region's character and sense of identity".	No reason given.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: " <u>Manage historic heritage values to p</u> Protect <del>and enhance</del> the values of places and areas of historic heritage <u>from inappropriate development</u> , by: ... c) Avoiding <u>remedying or mitigating</u> adverse effects on those values which contribute to the area or place being of regional or national significance; and <del>d) Avoiding significant adverse effects on other values of areas and places of historic heritage; and</del> e) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> f) <del>Remediating, when adverse effects on other values cannot be avoided; and</del> g) <del>Mitigating when adverse effects on other values cannot be avoided or remediated; and</del> h) ..."	<ul style="list-style-type: none"> <li>• The PRPS does not correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows: <del>"Managing for rural</del> <u>Protecting regionally significant industry</u> activities <del>from inappropriate</del>	<ul style="list-style-type: none"> <li>• Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.</li> <li>• The PRPS is too focused on recognising and providing for the</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><del>subdivision, use and development</del>            Manage activities in rural areas, to support the region's economy and communities, by:</p> <p>a) Enabling <u>regionally significant industry activities</u>, <del>farming and other rural activities that support the rural economy</del>; and</p> <p>b) Minimising the loss of <u>regionally significant soils highly valued for their versatility for primary production</u>; and</p> <p>c) Restricting the establishment of activities <del>in rural areas</del> that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u>; and</p> <p>d) <del>Minimising</del> <u>Restricting</u> the subdivision of productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and</p> <p>e) Providing for other activities that have a functional need to locate in rural areas <del>including tourism and recreational activities that are of a nature and scale compatible with rural activities.</del>"</p>	primary production sector, with not enough recognition of and provision for the tourism sector.
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Amend	<p>Amend as follows:            "Recognising <u>and providing for</u> the values of Otago's central business districts            Recognise <u>and provide for</u> the values of Otago's central business districts, including as the primary focal point for social, cultural and economic activities within a community."</p>	No reason given.
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	<p>Amend as follows: "Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of <del>the Otago's</del> central business districts and support local commercial needs, by:</p> <p>a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and</p> <p>...</p> <p>c) Avoiding unplanned extension of commercial activities that has significant adverse effects on <del>the a</del> central business district, including on the efficient use of infrastructure, employment and services; and</p> <p>..."</p>	No reason given.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	<p>Amend as follows: "Manage the finite nature of land suitable and available for industrial activities, by:</p> <p>a) Providing specific areas to accommodate <del>the effects of</del> industrial activities; and</p> <p>b) Providing a range of land suitable for different industrial activities <del>including land extensive activities</del>; and</p> <p>c) Restricting the establishment of activities in industrial areas that may result in:</p> <p>i. Reverse sensitivity effects <u>on industrial activities</u>; or</p>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				ii. Inefficient use of industrial land or infrastructure."	
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend as follows: "Managing locational needs for mineral and gas exploration, extraction and processing Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Giving preference to avoiding their location in-</del> <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on :</u> i. ... b) Restricting the establishment of <del>these</del> activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities.</u> "	No reason given.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in-</del> ... e) <u>Assessing the significance of adverse effects on those values, as detailed in Schedule 3;</u> <del>and,</del> ... g) Considering the use of offsetting, or compensatory measures, <u>to address</u> <del>for</del> residual adverse effects <u>on the environment;</u> and ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values <del>only</del> when: a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and b) Those <u>adverse</u> effects cannot be avoided, remedied or mitigated; and c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."	<ul style="list-style-type: none"> <li>• The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection.</li> <li>• Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	Amend as follows: " <u>Providing for</u> <del>Offsetting for</del> <u>from adverse effects on</u> indigenous biodiversity Provide for offsetting <del>for</del> <u>from adverse effects</u> on indigenous biodiversity, when <del>it is enabled,</del> <u>by ensuring that:</u> a) The offset achieves no net loss <del>and preferably a net gain</del> in indigenous biodiversity	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				values; and b) The offset is undertaken close to the location of development <del>where this will result in the best ecological outcome; and...</del>	
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	Add the following method: "1.1.4 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."	No reason given.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<ul style="list-style-type: none"> <li>Amend Method 1.2.1 as follows: "Identify <del>and protect from inappropriate subdivision, use and development</del> places, areas or landscapes of cultural, spiritual or traditional significance to them;"</li> <li>Amend Method 1.2.2 as follows: "Identify, and protect <del>from inappropriate subdivision, use and development</del> the values that contribute to their significance;"</li> <li>Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</li> </ul>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Oppose	Delete Method 1.4.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Oppose	Delete Method 2.2	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Oppose	Delete Method 2.3.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting <del>from inappropriate subdivision, use and development</del> , historic heritage places <del>or</del> areas <del>or</del> landscapes located in the beds of rivers, lakes and wetlands or the coastal marine area;"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.12.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7.	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>Unnecessary or ambiguous ("may").</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend Method 4.2.1 as follows: "City or district councils will implement Policies 3.2.2 and 3.2.3 <del>to the extent applicable</del> when	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				undertaking natural hazard assessments".	
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend Method 6.1.2 as follows: "Regional, city and district councils, in their areas of responsibility, will identify: ... d) <u>Special amenity landscapes;</u> ... g) <u>Regionally significant soil resources;</u> h) <u>Significant infrastructure;</u> "	<ul style="list-style-type: none"> <li>Concerned about introducing the term of Special Amenity Landscapes.</li> <li>Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> <li>Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. Too high a level of protection could have adverse effects on the economic and social wellbeing of communities.</li> <li>Significant infrastructure should be defined, recognised and provided for.</li> </ul>
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Oppose	Delete Method 7.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
211	Method 8 - Education and Information	Method 8.1.1 - Information from regional, district and city councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
214	Method 8 - Education and Information	Method 8.1.4 - Information from city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
215	Method 9 - Funding	Method 9 - Funding	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
220	Method 11 - Advocacy and Facilitation	Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional	Oppose	Delete Methods.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Amend d) as follows: "d) Facilitate coordination between <del>lifeline utilities</del> <u>significant infrastructure and significant community facilities used</u> for emergency management, including by: i) Recognising the interconnections between <u>significant infrastructure</u> <del>lifeline utilities</del> ..."	No reason given.
225	Method 11 - Advocacy and Facilitation	Method 11.2.3 - Facilitation by regional, city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
248	Appendices	Appendices - general	Oppose	Delete Appendix 1.	<ul style="list-style-type: none"> <li>Duplicates the RMA or other statutory documents, including any</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS.</li> </ul>	<p>provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and</p> <ul style="list-style-type: none"> <li>Is not required by RMA S62 or is not an active directive.</li> </ul>
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>Add the following definitions: <ul style="list-style-type: none"> <li>Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance;</li> <li>Significant Community Facility - include facilities that provide essential community services; <ul style="list-style-type: none"> <li>Urban;</li> </ul> </li> <li>Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS;</li> <li>Regionally Significant Industry Activity - include any activity associated with tourism or primary production; <ul style="list-style-type: none"> <li>Hard mitigation measures;</li> </ul> </li> </ul> </li> <li>Amend definition of Kai Tahu to clarify if has the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning documents outside Otago.</li> </ul>	To reduce ambiguity and enable more efficient implementation of the PRPS.
250	Glossaries	Glossary of Te Reo terms	Oppose	Delete and include these terms in the Glossary.	Unnecessary to have 2 separate glossaries.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Delete or amend text that: <ul style="list-style-type: none"> <li>Is duplicated;</li> <li>Is vague or ambiguous;</li> <li>Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation;</li> <li>Is not required by RMA S62 or is not an active directive; and</li> <li>Delete all "need" statements.</li> </ul>	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>"Need" statements are not required by RMA S62 or is not an active directive.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	<ul style="list-style-type: none"> <li>Any consequential or other amendments required to give effect, or like effect, to any matter raised in the submission.</li> </ul>	No reason given.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	<ul style="list-style-type: none"> <li>Retention of all provisions as notified, except as requested in the submission.</li> </ul>	No reason given.
6	Overall approach	Schedule 3 - Significance threshold	Oppose	<ul style="list-style-type: none"> <li>Delete; or</li> <li>Amend so it is consistent with case law and insert new criteria to reflect the need to consider offsetting or compensation and to reflect environmental/planning context on a case-by-case basis, e.g.: <ul style="list-style-type: none"> <li>11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly offset or otherwise compensated, and consequently reducing the significance of the effect.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>The S32 report does not evaluate Schedule 3.</li> <li>Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant.</li> <li>Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• 12. Environmental Context: The degree of change in social, economic, cultural, or ecological conditions, and the extent to which these conditions can absorb that change.</li> <li>• 13. Matters of national importance and national significance: The extent to which the adverse effect changes a value recognised as a matter of a national importance under section 6 of the RMA. The extent to which the adverse effect is provided for, or is contrary to, any matter of national significance specified in a NPS or the NZCPS."</li> </ul>	
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Amend	Amend as follows: "The principles of Te Tiriti o Waitangi are <u>identified and</u> taken into account in resource management decisions".	No reason given.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	<p>Amend as follows: "Policy 1.1.2 <u>Identifying and</u> <del>Faking</del> the principles of Te Tiriti o Waitangi into account</p> <p>Ensure that local authorities <del>exercise their functions and powers, to</del> <u>take into account the principles of Te Tiriti o Waitangi identified in Appendix 1A by:</u></p> <p>a) <u>Providing</u> <del>Accord</del> Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and,</p> <p>b) <del>Involve</del> <u>Involving</u> Kai Tahu in resource management decision-making processes and implementation; and</p> <p>c) <del>Take</del> <u>Taking</u> into account Kai Tahu views in resource management decision-making processes and implementation, particularly regarding the relationship of their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taoka ; and</p> <p>d) <del>Ensure</del> <u>Ensuring</u> Kai Tahu have the prerogative to:</p> <p>i. <del>Identify</del> <u>Identifying</u> their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and</p> <p>ii. <del>Determine</del> <u>Determining</u> how best to express that relationship; and</p> <p>e) <del>Ensure</del> <u>Ensuring</u> Kai Tahu are able to exercise kaitiakitaka; and</p> <p>f) <del>Ensure</del> <u>Ensuring</u> that district and regional plans:</p> <p>i. <del>Give</del> <u>Giving</u> effect to the Ngai Tahu Claims Settlement Act 1998; and</p> <p>ii. <del>Recognise</del> <u>Recognising</u> and <del>provide</del> <u>providing</u> for statutory acknowledgement areas, as detailed in Schedule 2; and</p> <p>iii. <del>Provide</del> <u>Providing</u> for other areas in Otago that are recognised as significant to Kai Tahu in a manner similar to that prescribed for statutory acknowledgement areas."</p>	Use wording of RMA Part 2.

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16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	Amend as follows: "Objective 1.2 Kai Tahu values, rights and interests and customary resources are <u>identified and sustained</u> ."	No reason given.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	Amend a) as follows: "a) Ensuring <u>sustainable management of</u> resources supports <del>their</del> customary uses and cultural values (as detailed in Schedules 1A and B); and"	No reason given.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> , on those values and sites <del>as detailed in Schedule 3</del> ; and"	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<ul style="list-style-type: none"> <li>• Amend b) as follows: "b) Avoiding significant adverse effects <u>from inappropriate development</u> on matters of national importance; and"</li> <li>• Delete c).</li> </ul>	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Specify or identify "other cultural values" referred to in other parts of the RPS in Schedule 1A.	No reason given.
25	Objectives on high quality natural resources	Issue 2.1 - Degradation of Otago's natural resources	Amend	Amend Issue as follows: "Degradation of <u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time <del>will</del> <u>can</u> cause serious damage."	Regional issues include natural resource management issues.
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected <u>from inappropriate subdivision, use and development</u> ."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
27	Objectives on high quality natural resources	Issue 2.3 - Interconnection of natural systems and resource management	Amend	Amend as follows: " <del>Natural</del> <u>Environmental</u> systems <u>and resources</u> are interconnected, complex and difficult to manage in a consistent and effective way. Sometimes, the use of one resource adversely affects the <u>environmental</u> value of another..."	No reason given.
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural <del>and physical</del> resources are recognised, <u>and protected from inappropriate subdivision, use and development</u> , <del>maintained and enhanced</del> ."	<ul style="list-style-type: none"> <li>• Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.</li> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to: ... c) Protect <u>outstanding water bodies</u> and	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				wetlands <u>from inappropriate subdivision, use and development</u> ; and d) Protect migratory patterns of freshwater species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... j) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and k) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and l) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ... b) Protect outstanding water bodies and wetlands <u>from inappropriate subdivision, use and development</u> ; and ... g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and ... g) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and h) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend b) as follows: "b)Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those</u> soils, to: ... f) <del>Retain</del> <u>Ensure the primary use of regionally significant soil resources is</u> for primary production <u>purposes</u> ; and g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values <u>as identified in Schedule 1A</u> ; and ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS should be focused on resource management issues of regional significance.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				k) Avoid contamination of soil <u>from inappropriate subdivision, use and development</u> ; and ..."	
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity <u>from inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	Amend c) iii. as follows: "iii. Historical <del>and heritage</del> - associations".	No reason given.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• As applies to all landscape assessments, including for "Special Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Add the following new policy: " <u>Managing cross boundary landscape effects</u> <u>Promote alignment of District Plans and integrated assessments of environmental effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries.</u> "	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries, which would benefit from a regionally integrated approach.</li> <li>• This proposed policy would be as effective as the provisions on Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend as follows: " <del>Protect and enhance</del> <u>Manage subdivision, use and development that affects</u> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects <del>on these values which contribute</del> <u>which will result in</u> to the area or habitat <u>losing its</u> <del>being</del> significant <u>status</u> ; and b) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on other values of the area or habitat; and <del>c) Assessing the significance of adverse effects on these values, as detailed in Schedule 3; and</del> ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes <del>, using the attributes as detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• These attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</li> <li>• Risk of inefficiencies in case of inconsistency with standard practice.</li> <li>• Schedule 4 should be deleted</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Amend as follows: " <del>Protect, enhance and restore</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding natural features, landscapes and seascapes, by: a) Avoiding adverse effects <del>on these values which contribute to</del> <u>which will result in</u> the	<ul style="list-style-type: none"> <li>• Could disrupt the balance of the values of outstanding natural landscapes and features and other important values.</li> <li>• For example, ski fields are appropriate to locate in alpine environments that may be considered outstanding natural landscapes.</li> <li>• Ensuring such businesses can continue to operate and provide an important recreational and economic resource to Otago should be borne in mind.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>loss of the significance of the natural feature, landscape or seascape; and</p> <p>...</p> <p><del>e) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</del></p> <p>...</p> <p><u>g) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values</u></p> <p><u>(h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate".</u></p>	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	Amend as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding <del>using the attributes detailed in Schedule 4.</del> "	<ul style="list-style-type: none"> <li>• Concerned about introducing the term of Special Amenity Landscapes.</li> <li>• Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of different criteria being used in current or proposed district plans, and hence, creating inefficiencies and potentially slowing down forthcoming district plan reviews. These concerns also relation to Schedule 4.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social wellbeing of communities.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	Amend as follows: " <del>Protect or enhance the values of: Manage special amenity landscapes and highly valued natural features, by:</del> a) <del>Avoiding remedying or mitigating significant adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and</del> <del>b) Avoiding remedying or mitigating other adverse effects on other values; and</del> c) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> ... <u>g) Recognising and providing for the use of such resources including as places where productive activities, tourism, recreation, infrastructure, homes and work places are located.</u> <u>h) Allowing values to adapt over time as communities and economies change.</u> "	<ul style="list-style-type: none"> <li>• Level of protection not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it.</li> <li>• Better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment.</li> <li>• Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category.</li> <li>• The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend as follows: "Preserve or enhance the natural character values of the coastal environment, by: a) <u>Avoiding adverse effects of activities on natural character in areas of the coastal environment with</u> <del>on those values which contribute to the outstanding natural character of an area;</del> and	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>

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				b) Avoiding significant adverse effects <u>and avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment</u> <del>on</del> those values which contribute to the high natural character values of an area; and c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and d) <u>Avoiding, remedying or mitigating other adverse effects on other values</u> ; and..."	
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend as follows: " <del>Protect</del> <u>Manage subdivision, use and development that affects</u> the values of outstanding water bodies and wetlands by: a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> , including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and ... c) <u>Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</u> ..."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	Amend as follows: "Policy 2.2.14 Identifying <del>highly valued</del> <u>regionally significant</u> soil resources Identify areas and values of <del>highly valued</del> <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Amend as follows: "Policy 2.2.15 Managing <del>highly valued</del> <u>regionally significant</u> soil resources Protect the values of <del>areas of highly valued</del> <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on those values which contribute to the soil being <del>highly valued</del> <u>regionally significant</u> ; and ... c) <u>Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</u> d) Recognising that <u>loss of regionally significant soils to urban expansion development</u> may be appropriate <u>near</u> <del>due to</del> location and proximity to existing urban development <del>and infrastructure</del> <u>particularly when there is a lack of supply of land available for urban development</u> ."	<ul style="list-style-type: none"> <li>• Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend as follows: " <del>Natural resource s</del> Systems and their interdependencies are recognised"	No reason given.
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are	Amend	Add the following policy: " <u>Applying an integrated management approach for significant infrastructure and activities that</u>	<ul style="list-style-type: none"> <li>• Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		recognised		<u>affect significant infrastructure</u> <u>Apply an integrated management approach to the management of significant infrastructure and activities that affect significant infrastructure, by:</u> a) Promoting consistent corridor management throughout the region."	<ul style="list-style-type: none"> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>Amend a) as follows: "a) Taking into account the impacts of management of one resource on the <u>environmental</u> values of another, or on the environment in general; and".</li> <li>Add the following clauses: " <u>c) Ensuring that resource objectives are complementary across administrative boundaries; and</u> <u>d) Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units.</u> "</li> </ul>	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management approach within a resource	Oppose	Delete policy.	<ul style="list-style-type: none"> <li>Regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach.</li> <li>Amendments sought to improve the management of cross boundary issues and resources.</li> </ul>
66	Objectives on resilience, health and safety	Issue 3.1 - Risk of overreaching the environment's carrying capacity	Amend	Amend as follows: "Activities that <u>utilise resources</u> <del>-are undertaken-</del> without regard to their <del>local-</del> <u>environmental values</u> <del>-are at greater risk inappropriately compromising</del> <del>-of overreaching that-</del> <u>the</u> environment's ability to sustain the activity."	No reason given.
70	Objectives on resilience, health and safety	Issue 3.5 - Importance of infrastructure of regional or national significance	Amend	Amend as follows: " <u>It is important to recognise and provide for Significant Infrastructure</u> <del>-of regional and national significance-</del> <u>even though it may result in</u> <del>local-</del> adverse environmental <u>effects</u> <del>-impacts, or adversely affect other nationally important values...</del> "	Significant infrastructure should be defined, recognised and provided for.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of <del>-natural and physical</del> resources recognises environmental constraints".	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend as follows: "Policy 3.1.1 Recognising <del>-natural and physical</del> environmental constraints Recognise the <del>-natural and physical</del> environmental constraints of <u>resources</u> <del>-an area-</del> , the <u>environmental</u> effects of those constraints on activities <u>utilising those resources</u> , and the <u>environmental</u> effects of those activities on those constraints, <del>-including with particular recognition of :</del> ... c) The sensitivity of <del>the natural and physical</del> resources to adverse effects from the proposed activity/land use; and ..."	No reason given.
79	Objectives on resilience, health	Objective 3.2 - Risk that natural	Amend	Amend Objective 3.2 as follows: " <u>Inappropriate</u>	Designing to a 100 year level may be appropriate, but it would often

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	and safety	hazards pose to Otago's communities are minimised		risk that natural hazards pose to Otago's communities are minimised"	not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities, including hazards of low likelihood and high consequence."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Amend as follows: "Manage natural hazard risk, including with particular regard to: a) The risk they posed, considering the likelihood and consequences of natural hazard events; and ..."	<ul style="list-style-type: none"> <li>• Unnecessary ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend 1st sentence as follows: "Assess activities in areas known to be subject to an identified, for natural hazard risk, by considering:..."	No reason given.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend as follows: "Policy 3.2.6 Avoiding increased natural hazard risk from inappropriate subdivision, use and development Avoid remedy or mitigate increased increasing natural hazard risk from inappropriate subdivision, use and development, including by:..."	<ul style="list-style-type: none"> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• It would often not be reasonable to design to a 1000 year event or greater (which "avoidance" may imply).</li> </ul>
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Amend 1st sentence as follows: "Reduce existing natural hazard risk, including particularly by:"	No reason given.
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	Amend as follows: "Enable the location of hard mitigation measures or similar engineering interventions on public land only when: a) There is significant public or environmental benefit in doing so; or b) The work relates to the functioning ability of significant infrastructure, a lifeline utility, or facility used for essential or emergency services, or a significant community facility."	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ... b) Designing infrastructure to take into account: ... iv. Natural and physical Resource constraints; and v. Effects on the values of natural and physical resources; and ... c) Managing urban growth in a coordinated manner to ensure : i. Within areas that have sufficient infrastructure services are provided capacity; or ii. Where infrastructure services can be upgraded or extended efficiently and effectively ; and d) Co-ordinating the design and development of	<ul style="list-style-type: none"> <li>• Territorial authorities, who are well attuned to the costs of infrastructure provision, should be well placed to make such assessments without direction from an RPS.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community costs than benefits in high growth areas.</li> <li>• Regulation of the release of land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				infrastructure with the staging of land use change, including with: i. Structural design and release of land for new urban development; or ii. Structural redesign and redevelopment within existing urban areas."	
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Amend as follows: "Manage infrastructure activities, to: ... b) <del>Reduce</del> Avoid, remedy or mitigate adverse effects of those activities, including cumulative adverse effects on <del>natural and physical</del> resources; and c) Support economic, social and community <del>needs</del> activities; and d) Improve efficiency of use of <del>natural</del> resources; and e) Protect infrastructure corridors <del>from inappropriate subdivision, uses and development</del> for infrastructure needs, now and for the future; and ... g) Protect the functioning of <u>significant infrastructure</u> , <del>lifeline utilities</del> and essential or emergency services."	Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32.
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	Amend as follows: "Policy 3.4.3 Designing <del>lifeline utilities</del> <u>significant infrastructure</u> and facilities for essential or emergency services Design <del>lifeline utilities</del> <u>significant infrastructure</u> , and facilities for essential or emergency services, to:..."	No reason given.
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	• Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, <del>lifeline utilities</del> , <u>significant infrastructure</u> , and essential and emergency services". • Delete d).	• The practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	Amend as follows: " <u>Significant</u> Infrastructure of <del>national and regional significance</del> is <u>recognised and provided for</u> managed in a sustainable way."	Significant infrastructure should be defined, recognised and provided for.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend as follows: "Policy 3.5.1 <u>Recognising and providing for</u> national and regional significance of infrastructure Recognise <u>and provide for</u> the <del>national and regional</del> significance of the following infrastructure: a) Renewable electricity generation facilities <del>where they supply the national electricity grid and local distribution network</del> ; and ... f) Structures for transportation by rail <u>and tourism activities</u> ."	• Significant infrastructure should be defined, recognised and provided for. • The PRPS does not give enough recognition of and provision for the tourism sector.
105	Infrastructure of national or	Policy 3.5.2 - Managing adverse	Amend	Amend as follows:	• Significant infrastructure should be defined, recognised and provided

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	regional significance	effects of infrastructure that has national or regional significance		"Policy 3.5.2 Managing adverse effects of <del>significant</del> infrastructure <del>that has national or regional significance</del> <del>Minimise</del> <u>Avoid, remedy or mitigate</u> adverse effects from <del>significant</del> infrastructure <del>that has national or regional significance</del> , by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in:</del> ... b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding</del> <u>minimising</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and ... d) <del>Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</del> e) <del>Considering</del> <u>Enabling infrastructure providers to employ</u> the use of offsetting <del>or</del> other compensatory measures <u>to address</u> <del>for</del> residual adverse effects on <u>the environment indigenous biodiversity</u> ."	for. • Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32. • The practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	• Amend header as follows: "Protecting <del>significant</del> infrastructure <del>of national or regional significance</del> ". • Delete d).	• Significant infrastructure should be defined, recognised and provided for. • The practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	Amend as follows: "Policy 3.6.2 Promoting small <u>and community</u> scale renewable electricity generation Promote small <u>and community</u> scale renewable electricity generation activities that : a) <del>Increase the local community's resilience and security of energy supply; and</del> b) <del>Avoid, remedy or mitigate adverse effects from that activity."</del>	No reason given.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	• Amend 1st sentence as follows: "Protect the generation capacity of <u>nationally or regionally significant</u> renewable electricity generation activities, by...". • Delete d).	• The practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).
113	Energy	Policy 3.6.5 - Protecting electricity distribution infrastructure	Amend	Amend as follows: • Delete d). • "e) Protecting <del>existing</del> distribution corridors for infrastructure needs, now and for the future."	• The practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Amend	Amend as follows: "Encourage the use of good urban design principles in subdivision and development in urban areas <del>as detailed in Schedule 6</del> , to: ... b) Ensure that the built form relates well to its <del>surrounding natural</del> environment <del>including</del>	• Schedule 6 not assessed in S32 report. • Likely that will add to existing assessment requirements (urban design protocol & matters set out in District Plans) for little added benefits. • May be to the detriment of good urban design for specific sites.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				by: i. <del>Reflecting natural features such as rivers, lakes, wetlands and topography; and</del> ii. <del>Providing for ecological corridors in urban areas; and</del> iii. <del>Protecting areas of indigenous biodiversity and habitat for indigenous fauna; and</del> iv. <del>Encouraging use of low impact design techniques; and</del> v. <del>Encouraging construction of warmer buildings ; and</del> ..."	
118	Urban design	Schedule 6 - Urban form and design	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added benefits.</li> <li>• May be to the detriment of good urban design for specific sites.</li> </ul>
120	Urban design	Policy 3.7.3 - Designing for warmer buildings	Amend	Amend a) as follows: "a) <del>Maximising</del> <u>Optimising</u> passive solar gain; and"	No reason given.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Amend as follows: "Design <u>and maintain</u> public spaces, including streets and open spaces, to <u>provide for a range of uses and</u> meeting the reasonable access and mobility needs of all sectors within the community <del>including the young and those with mobility impairments.</del> "	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("including").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	Amend as follows: "Policy 3.8.1 <del>Managing</del> <u>Providing</u> for urban growth <del>Manage</del> <u>Provide for</u> urban growth and creation of new urban land in a strategic and co-ordinated way, by: a) <u>Understanding demand and supply of</u> <del>Ensuring there is sufficient</del> residential, commercial and industrial <u>zoned</u> land capacity, <del>to</del> <u>and catering for that</u> demand <del>for such land, projected over at least the next 10 years;</del> and b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to: i. Provide infrastructure in an efficient and effective way; and ii. <del>Avoid</del> <u>Discouraging</u> additional costs <u>on the public</u> that arise from unplanned infrastructure expansion; and c) Identifying future growth areas that: i. Minimise <u>significant</u> adverse effects on <del>rural the productivity of the rural and tourism sectors,</del> <u>including loss of highly valued soils or creating competing urban demand for water and other resources;</u> and ii. <u>Can be developed without resulting in significant adverse effects on any matter of national importance or national significance</u> <del>Maintain or enhance significant biodiversity, landscape or natural character values ; and</del>	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>• Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.</li> <li>• Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community.</li> <li>• Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS.</li> <li>• "Considering the need for urban growth boundaries" should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential methods.</li> <li>• "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District.</li> <li>• Schedule 6 not assessed in S32 report.</li> <li>• Likely that will add to existing assessment requirements (urban design protocol &amp; matters set out in District Plans) for little added</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><del>iii. Maintain important cultural or heritage values; and</del>  <del>iv. iii. Avoid land with significant risk from natural hazards which cannot be remedied or mitigated; and</del>            d) Considering the need for urban growth boundaries to control <u>potentially inappropriate</u> urban expansion; and            e) Ensuring efficient use of land; and            f) Requiring the use of low or no-emission heating systems in buildings, <del>when</del> <u>where</u> ambient air quality <del>in or near the growth area</del> is:            i. Below standards for human health; or            ii. Vulnerable to degradation given the local climatic and geographical context; and            g) Giving effect to the principles of good urban design <del>as detailed in Schedule 6;</del> and            h) Giving effect to the principles of crime prevention through environmental design</p>	<p>benefits.            • May be to the detriment of good urban design for specific sites.</p>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	Delete the policy.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown.</li> <li>• Referencing to staging the release of land does not reflect the realities of urban development and does not represent an efficient use of resource, nor an effective means of controlling effects.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS:               <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
126	Urban growth	Schedule 8 - Urban Growth Boundaries	Oppose	Delete schedule.	<ul style="list-style-type: none"> <li>• The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>• It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>• Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.</li> <li>• There would be significant inefficiencies in detailing growth boundaries in an RPS:               <ul style="list-style-type: none"> <li>• A private plan change cannot apply to change an RPS.</li> <li>• The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>• Inconsistency with the glossary which states that urban growth areas</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend as follows: "Manage subdivision, use and development of rural land, to: a) Avoid <u>inappropriate</u> development or fragmentation of land <u>particularly</u> which undermines or forecloses the potential of rural land: i. For primary production <u>or tourism</u> ; or ... b) Have particular regard to whether the proposal will result in a loss of the productive potential of <u>regionally significant, highly versatile</u> soils, unless: i. The land adjoins an existing urban area and there is no other land suitable for urban expansion <u>, or there is a shortage of land available for urban development</u> ; and ii. <del>There highly versatile soils are needed for urban expansion,</del> any change of land use from rural activities achieves an appropriate and highly efficient form of urban development; and iii. reverse sensitivity effects on rural productive activities can be <u>satisfactorily</u> avoided; and c) Avoid unplanned demand for provision of <u>public infrastructure investment</u> , including domestic water supply and waste disposal; and d) Avoid creating <u>significant</u> competing demand for water <del>or other</del> resources."	are as defined in a District Plan. • The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector. • The PRPS does not adequately address the issue of the shortage of zoned land supply, particularly in Queenstown. • Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region.
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk</u> <del>harm</del> human health or the quality of the environment <del>in Otago</del> ".	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend c) as follows: "c) Avoiding <u>significant</u> adverse effects of those substances and materials on the health and safety of people, and on other values; and".	No reason given.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Amend a) as follows: "a) Prior to subdivision or development of potentially contaminated land, <u>requiring</u> <del>ensuring</del> a site investigation is undertaken to determine the nature or extent of any contamination; and"	No reason given.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Amend as follows: "Avoid the creation of new contaminated land <u>which would give rise to risks to human health or would measurably degrade natural values</u> ".	• Avoiding the creation of new contaminated land may not always be appropriate or practical: in remediating contaminated land it may be appropriate to move soil to another location depending on where it is situated and how that land is to be used. • The emphasis should be on avoiding risks to human health or the environment.
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	• Add the following objective: "Significant industry activities and physical resources are provided for". • Add the following policy: "Recognising and providing for significant industry activities and physical resources	Regionally Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>Recognising and providing for significant industry activities and physical resources, by:</p> <p>a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety;</p> <p>b) Protecting significant industry activities from inappropriate subdivision, use, and development;</p> <p>c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated."</p> <p>• Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to:</p> <p>a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and cultural well-being;</p> <p>b) Protect significant industry activities from inappropriate subdivision, use, and development;</p> <p>c) Enable significant industry activities and development that does not have a significant adverse effect on the environment;</p> <p>d) Provide for urban development and all other significant industry activities and development that does not have a significant adverse effect on any matter of national importance or national significance."</p>	
140	Objectives on use and enjoyment of natural and built environment	Issue 4.3 - Conflicts between uses	Amend	Amend as follows: " <del>Sometimes, e</del> Existing businesses may be placed at risk by pressure to change - activities are susceptible to reverse sensitivity effects, particularly when land use changes -to activities that may compete or conflict, creating reverse sensitivities-."	No reason given.
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend as follows: "Many <del>natural and physical</del> resources we rely on for economic activity and wellbeing are finite and under pressure from different uses and users."	No reason given.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend as follows: "Maintain and <del>, where possible,</del> enhance public access to the natural environment, including to the coast, lakes, rivers and their margins, and areas of cultural or historic significance, unless restricting access is necessary to: ... b) Protect the <del>natural heritage and ecosystem</del> values of sensitive natural areas or habitats;	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Amend as follows: " <del>Significant h</del> Historic heritage resources are recognised and contribute to the region's character and sense of identity".	No reason given.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend as follows: " <del>Manage historic heritage values to p</del> Protect and enhance the values of places and areas of historic heritage <del>from inappropriate development</del> , by: ... c) Avoiding <del>remedying or mitigating</del> adverse effects on those values which contribute to the area or place being of regional or national significance; and -d) Avoiding significant adverse effects on other values of areas and places of historic heritage; and e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and f) Remediating, when adverse effects on other values cannot be avoided; and g) Mitigating when adverse effects on other values cannot be avoided or remediated; and h) ..."	<ul style="list-style-type: none"> <li>• The PRPS does not correctly provide for subdivision, use and development that may be appropriate even when matters of national importance are adversely affected.</li> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend as follows: " <del>Managing for rural</del> <u>Protecting regionally significant industry activities from inappropriate subdivision, use and development</u> Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling <u>regionally significant industry activities</u> <del>, farming and other rural activities that support the rural economy</del> ; and b) Minimising the loss of <u>regionally significant soils</u> <del>highly valued for their versatility for primary production</del> ; and c) Restricting the establishment of activities <del>in rural areas</del> that may lead to reverse sensitivity effects <u>on regionally significant industry activities</u> ; and d) <del>Minimising</del> <u>Restricting</u> the subdivision of productive rural land into smaller lots that may result in <u>inappropriate</u> rural residential activities; and e) Providing for other activities that have a functional need to locate in rural areas <del>, including tourism and recreational activities that are of a nature and scale compatible with rural activities</del> ."	<ul style="list-style-type: none"> <li>• Significant Industry Activities (tourism and primary production) should be defined, recognised and provided for.</li> <li>• The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector.</li> </ul>
157	Land management for economic production	Policy 4.3.3 - Recognising the values of Otago's central business districts	Amend	Amend as follows: "Recognising <u>and providing for</u> the values of Otago's central business districts Recognise <u>and provide for</u> the values of Otago's central business districts, including as the primary focal point for social, cultural and economic activities within a community."	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	Amend as follows: "Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of <del>the</del> <u>Otago's</u> central business districts and support local commercial needs, by: a) Enabling a wide variety of commercial, social and cultural activities in the central business districts; and ... c) Avoiding unplanned extension of commercial activities that has significant adverse effects on <del>the</del> <u>a</u> central business district, including on the efficient use of infrastructure, employment and services; and ..."	No reason given.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	Amend as follows: "Manage the finite nature of land suitable and available for industrial activities, by: a) Providing specific areas to accommodate <del>the effects of</del> industrial activities; and b) Providing a range of land suitable for different industrial activities <del>, including land extensive activities</del> ; and c) Restricting the establishment of activities in industrial areas that may result in: i. Reverse sensitivity effects <u>on industrial activities</u> ; or ii. Inefficient use of industrial land or infrastructure."	No reason given.
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Amend as follows: "Managing locational needs for mineral and gas exploration, extraction and processing Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Giving preference to avoiding their location in</del> <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> : i. .... b) Restricting the establishment of <del>those</del> activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects <u>on mineral and gas exploration and extraction activities</u> ."	No reason given.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Amend as follows: "Minimise adverse effects from the exploration, extraction and processing of minerals, by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on</u> <del>Giving preference to avoiding their location in</del> : ..."	<ul style="list-style-type: none"> <li>• The practicality of applying Schedule 3 efficiently is very questionable.</li> <li>• Schedule 3 criteria are inadequate (see submission on Schedule 3).</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and;</p> <p>...</p> <p>g) Considering the use of offsetting, or compensatory measures, <u>to address</u> <del>for</del> residual adverse effects <u>on the environment</u>; and</p> <p>..."</p>	
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	<p>Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values <del>only</del> when:</p> <p>a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and</p> <p>b) Those <u>adverse</u> effects cannot be avoided, remedied or mitigated; and</p> <p>c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."</p>	<ul style="list-style-type: none"> <li>The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection.</li> <li>Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	<p>Amend as follows:</p> <p><del>"Providing for o</del>Offsetting <del>for</del> <u>from adverse effects on</u> indigenous biodiversity</p> <p>Provide for offsetting <del>for</del> <u>from adverse effects</u> on indigenous biodiversity, when <del>it is enabled</del>, by ensuring that:</p> <p>a) The offset achieves no net loss <del>and preferably a net gain</del> in indigenous biodiversity values; and</p> <p>b) The offset is undertaken close to the location of development <del>, where this will result in the best ecological outcome</del>; and..."</p>	No reason given.
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	Add the following method: "1.1.4 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."	No reason given.
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<ul style="list-style-type: none"> <li>Amend Method 1.2.1 as follows: "Identify <del>and protect</del> <u>from inappropriate subdivision, use and development</u>, places, areas or landscapes of cultural, spiritual or traditional significance to them;"</li> <li>Amend Method 1.2.2 as follows: "Identify, and protect <del>from inappropriate subdivision, use and development</del>, the values that contribute to their significance;"</li> <li>Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests."</li> </ul>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Oppose	Delete Method 1.4.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Oppose	Delete Method 2.2	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
187	Method 2 - Regional, City and	Method 2.3 - Regional rule for	Oppose	Delete Method 2.3.	<ul style="list-style-type: none"> <li>Unnecessary or ambiguous ("may").</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	District Council Relationships	extinguishing existing use rights			<ul style="list-style-type: none"> <li>Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting <u>from inappropriate subdivision, use and development</u> , historic heritage places <u>or</u> areas <del>or landscapes</del> located in the beds of rivers, lakes and wetlands or the coastal marine area;"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.12.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7.	<ul style="list-style-type: none"> <li>Efficiency gains in removing unnecessary provisions.</li> <li>Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> <li>Unnecessary or ambiguous ("may").</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend Method 4.2.1 as follows: "City or district councils will implement Policies 3.2.2 and 3.2.3 <u>to the extent applicable</u> when undertaking natural hazard assessments".	No reason given.
196	Method 5 - Regional Policy Statement	Method 5 - Regional Policy Statement	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>The section 32 analysis supporting urban growth boundaries is inadequate.</li> <li>It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level.</li> <li>The rationale for "10 years" of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages.</li> <li>There would be significant inefficiencies in detailing growth boundaries in an RPS: <ul style="list-style-type: none"> <li>A private plan change cannot apply to change an RPS.</li> <li>The RPS may not adapt quick enough to accommodate growth.</li> </ul> </li> <li>Inconsistency with the glossary which states that urban growth areas are as defined in a District Plan.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend Method 6.1.2 as follows: "Regional, city and district councils, in their areas of responsibility, will identify: ... <del>d) Special amenity landscapes;</del> ... <u>g) Regionally significant soil resources;</u> <u>h) Significant infrastructure;</u> "	<ul style="list-style-type: none"> <li>Concerned about introducing the term of Special Amenity Landscapes.</li> <li>Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.</li> <li>Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. Too high a level of protection could have adverse effects on the economic and social wellbeing of communities.</li> <li>Significant infrastructure should be defined, recognised and provided</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Oppose	Delete Method 7.	for. <ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
211	Method 8 - Education and Information	Method 8.1.1 - Information from regional, district and city councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
214	Method 8 - Education and Information	Method 8.1.4 - Information from city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
215	Method 9 - Funding	Method 9 - Funding	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
220	Method 11 - Advocacy and Facilitation	Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional	Oppose	Delete Methods.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Amend d) as follows: "d) Facilitate coordination between <del>lifeline utilities - significant infrastructure and significant community facilities used</del> for emergency management, including by: i) Recognising the interconnections between <del>significant infrastructure - lifeline utilities;...</del> "	No reason given.
225	Method 11 - Advocacy and Facilitation	Method 11.2.3 - Facilitation by regional, city and district councils - optional	Oppose	Delete Method.	<ul style="list-style-type: none"> <li>• Unnecessary or ambiguous ("may").</li> <li>• Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS &amp; result in efficiency gains.</li> </ul>
248	Appendices	Appendices - general	Oppose	<ul style="list-style-type: none"> <li>• Delete Appendix 1.</li> <li>• Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that are to be applied when giving effect to the Otago RPS.</li> </ul>	<ul style="list-style-type: none"> <li>• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and</li> <li>• Is not required by RMA S62 or is not an active directive.</li> </ul>
249	Glossaries	Glossary	Amend	<ul style="list-style-type: none"> <li>• Add the following definitions:               <ul style="list-style-type: none"> <li>• Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance;</li> <li>• Significant Community Facility - include facilities that provide essential community services;</li> <li>• Urban;</li> <li>• Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS;</li> <li>• Regionally Significant Industry Activity - include any activity associated with tourism or primary production;</li> <li>• Hard mitigation measures;</li> </ul> </li> <li>• Amend definition of Kai Tahu to clarify if has the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning documents outside Otago.</li> </ul>	To reduce ambiguity and enable more efficient implementation of the PRPS.
250	Glossaries	Glossary of Te Reo terms	Oppose	Delete and include these terms in the Glossary.	Unnecessary to have 2 separate glossaries.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Delete or amend text that: <ul style="list-style-type: none"> <li>• Is duplicated;</li> <li>• Is vague or ambiguous;</li> </ul>	<ul style="list-style-type: none"> <li>• Efficiency gains in removing unnecessary provisions.</li> <li>• Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Duplicates the RMA or other statutory documents, including any provision stated in the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation;</li> <li>• Is not required by RMA S62 or is not an active directive; and</li> <li>• Delete all "need" statements.</li> </ul>	<ul style="list-style-type: none"> <li>• "Need" statements are not required by RMA S62 or is not an active directive.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Amend	<ul style="list-style-type: none"> <li>• Any consequential or other amendments required to give effect, or like effect, to any matter raised in the submission.</li> </ul>	No reason given.

### 139 Surfbreak Protection Society

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
39	Natural resource value management - general	Policy 2.1.8 - Recognising the values of natural character in the coastal environment	Amend	Amend as follows: "Recognise, <u>map and identify</u> , the values of natural character..."	Policy 13 of the NZCPS gives direction to identify and map Natural Character, the recommendation will keep the intent of the proposed RPS consistent with the NZCPS.
52	Highly valued natural resources - the coastal environment	Policy 2.2.10 - Identifying surf breaks of national importance	Amend	<ul style="list-style-type: none"> <li>• Change as follows: "Identifying surf breaks of <del>national</del> <u>regional</u> importance. <del>Recognise the surf breaks of national importance at:</del> a) Karitane; b) Papatowai; c) The Spit; d) Whareakeake. <u>Identify and map regionally significant surf breaks as listed in Schedule xx.</u>"</li> <li>• Create a schedule of regionally significant surfbreaks in the Otago region by means of consultation with local surfers and surfing organisations, as well as SPS that are mapped and identified, along with their swell corridors. It is envisaged that the schedule would be much in line with that already given in the Wavetrack New Zealand Surfing Guide. (Refer to submission).</li> </ul>	<ul style="list-style-type: none"> <li>• The NZCPS already gives protection to the listed nationally significant surfbreaks.</li> <li>• The Board of Inquiry to the NZCPS recognised that the four surfbreaks of national importance, and the other 30 listed in the Wavetrack guide require an equal level of protection (see submission for further details).</li> <li>• Other regions protect regionally significant surfbreaks (Taranaki, Wellington, Auckland).</li> <li>• It is important to retain the existing variety of surf break types to encompass a range of surfing skill level and provide variety in the spectrum of surfing opportunities.</li> <li>• Surf breaks contribute to the amenity values of an area (recreation, pleasantness of a site, enjoyment).</li> <li>• Surf breaks are reliant on a number of natural processes. They can easily become vulnerable and there is no reasonable technology to replicate / replace a surf break.</li> </ul>
53	Highly valued natural resources - the coastal environment	Policy 2.2.11 - Managing surf breaks of national importance	Amend	<ul style="list-style-type: none"> <li>• Amend as follows: "Managing surf breaks of <del>national</del> <u>regional</u> importance. Protect surf breaks of <del>national</del> <u>regional</u> importance, by: ..."</li> <li>• Cover the wider swell corridor and seabed, adjacent land and facilities, as well as the area of the surf break itself.</li> </ul>	<ul style="list-style-type: none"> <li>• See reasons given for recommended changes to policies 2.2.8 and 2.2.10.</li> <li>• A policy on surf breaks needs to address a variety of factor, including access to the surf break, water quality of the surf break and integrated consideration of potential effects on the physical processes that form a surf break.</li> </ul>

### 140 Oceana Gold (New Zealand) Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	<ul style="list-style-type: none"> <li>• Rebalance the provisions to place a greater emphasis on enablement.</li> <li>• Part B Chapter 4 should be about enabling the use of natural and physical resources to the greatest extent possible, consistent with the concept of sustainable management.</li> </ul>	<ul style="list-style-type: none"> <li>• Overall the proposed RPS does not yet achieve the right balance for the sustainable management of Otago's natural and physical resources.</li> <li>• Insufficient emphasis is placed on the need to enable the responsible use and development of our resources.</li> <li>• As presently drafted it appears that the proposed RPS is more</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>Part B Chapter 2 should be about ensuring that as activities are enabled, significant adverse effects are managed (not necessarily avoided) so that the environmental outcomes that result are the use and development of resources to facilitate economic and social wellbeing, while also attending to the matters in Section 5(2)(a)(b) and (c) of the RMA.</li> </ul>	focused on protection than enablement. That is not what the RMA calls for, and not what Otago needs.
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Relating to the use of "avoid, enhance, maintain": Amend and/or ensure that the use of prescriptive terms like "avoid" are what is actually intended.	<ul style="list-style-type: none"> <li>Due to the King Salmon case, drafting of provisions need greater precision.</li> <li>Subordinate plans must give effect to RPS, the use of "avoid" makes it practically impossible for councils to grant consents for certain activities, e.g. Oceana Gold's Coronation expansion and its adverse effects on significant ecological areas.</li> <li>In the case of some policies (eg 2.2.2(a)) the current wording is simply to avoid adverse effects on values which contribute to an area or habitat being significant. This is far too narrow and all such references need to be expanded to include options other than just avoiding adverse effects.</li> <li>Adverse effects may be unavoidable for some activities: it is critical to ensure applicants have options to remedy, mitigate and compensate as well as or instead of avoiding.</li> <li>Provisions of Policy 4.5.6 relating to mineral and gas exploration, extraction and processing do not overcome this difficulty.</li> </ul>
4	Overall approach	Introduction - RPS framework	Amend	Retain "Otago has high quality natural resources and ecosystems." [p.11] and expand by adding: " <u>Otago has significant natural mineral resources which provide important opportunities to promote Otago's economic development</u> ".	Important to recognise society's reliance upon Otago's natural environment and that this sustains our economy. Reference to our economy is supported.
4	Overall approach	Introduction - RPS framework	Amend	Retain "People are able to use and enjoy our natural and built environment" [p.11] and expand text by adding: "...while ensuring that resources <u>(other than mineral resources that are mined or quarried)</u> are sustained."	It is important to recognise that individual and community wellbeing to a large extent is based on the development of natural resources.
6	Overall approach	Schedule 3 - Significance threshold	Amend	Amend to: <ul style="list-style-type: none"> <li>Remove subjectivity and ambiguity</li> <li>Clarify how the schedule is intended to function, in particular weighing/balancing of criteria and threshold for being "significant"</li> <li>Ensure that regard is given to any mitigation proposed in order for the nature of the effect to be properly understood; and</li> <li>Ensure it satisfies the requirements in s32 of the Act.</li> </ul>	<ul style="list-style-type: none"> <li>Inclusion of the Schedule regarded as constructive and promoting transparent decision making</li> <li>Guidance required on how the Schedule is meant to function - e.g. how many matters does it take to become significant?</li> <li>How will the matters interact and be weighed?</li> <li>Some matters are subjective eg "affecting a large area".</li> <li>List is not exhaustive "consider matters including...". How much weight will be attributed to criteria listed in the Schedule as opposed to criteria not listed.</li> <li>Nature of effects needs to be understood having regard to any mitigation proposed, to provide context for the determination of significance.</li> <li>The Schedule has not been evaluated as required by Section 32 of the Act.</li> </ul>
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Amend (a) to read: "(a) Avoiding, <u>remediating or mitigating</u> significant adverse effects on those values and sites as detailed in Schedule 3.	<ul style="list-style-type: none"> <li>There may be circumstances where the tangata whenua are accepting of certain significant adverse effects, or where these effects occur but sustainable management is achieved.</li> <li>Interested in any changes that might be proposed to Method 4.1.11 which implements Policy 1.2.3.</li> </ul>
25	Objectives on high quality natural	Issue 2.1 - Degradation of	Amend	Change to: "Cumulative effects of human	Serious damage is a possible but not certain outcome of cumulative

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	resources	Otago's natural resources		activities on the environment may be difficult to pinpoint initially, but over time will <u>may</u> cause serious damage."	effects of human activities on the environment.
26	Objectives on high quality natural resources	Issue 2.2 - Highly valued natural resources	Amend	Add to the end of the issue: " <u>At the same time, the ability to undertake activities that affect or use these resources is fundamental to Otago's economic wellbeing.</u> "	Otago's significant and highly valued natural resources are a source of the region's development potential and need to be able to be appropriately used. The region's mineral resource is an obvious example of this.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	<ul style="list-style-type: none"> <li>Amend to explain whether there is a priority ranking or how the factors are meant to be balanced against on another.</li> <li>Amend to include a new line item as follows: "<u>g) Protect important economic uses of water</u>".</li> </ul>	<ul style="list-style-type: none"> <li>In light of the King Salmon case, the drafting of policies requires precision.</li> <li>Would like to understand how this policy would be applied in practice. Namely how are all the factors meant to be balanced or is there a priority ranking?</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	<ul style="list-style-type: none"> <li>Include an acknowledgement that some activities such as mining will have unavoidable adverse effects on the beds of rivers, wetlands, and their margins. In these instances adverse effects should be remedied, mitigated or compensated.</li> <li>Amend to explain whether there is a priority ranking or how the factors are meant to be balanced against on another.</li> </ul>	<ul style="list-style-type: none"> <li>Would like clarification on how this policy will actually be applied, namely how are all the factors meant to be balanced, or is there a priority ranking?</li> <li>There is no provision for any degradation of beds of rivers and lakes wetlands and their margins. This policy is not in keeping with sound resource management principles.</li> <li>In some instances activities at Macraes Mine may require the destruction of wetlands (eg creation of a pit or waste rock stack). This policy could preclude those activities.</li> </ul>
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	<ul style="list-style-type: none"> <li>Amend to clarify if there is a ranking or if it is acceptable to comply with one factor but not another.</li> <li>Delete (k), or in the very least amended to say: "<u>k) Avoid, remedy or mitigate any potential contamination of soil;</u>"</li> <li>It would be helpful if the policy were to acknowledge that where soil needs to be disturbed in connection with activities such as mining it should be retained and reused to the extent practicable.</li> </ul>	<ul style="list-style-type: none"> <li>It is not clear in this policy if there is a ranking of factors. When is it acceptable to provide for food production but not soil biodiversity.</li> <li>With this policy in place it is impossible for any mineral extraction industry to take place unless (k) is deleted or amended.</li> <li>Not explicit that disturbed soil should be retained and raised where possible.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	<ul style="list-style-type: none"> <li>Amend to provide for instances where indigenous biodiversity values may not be maintained or enhanced.</li> <li>Amend (a) to refer to indigenous biodiversity "<u>at a regional scale</u>".</li> <li>Also amend (d) to read: "<u>Protect Promote important hydrological services, including...</u>"</li> </ul>	<ul style="list-style-type: none"> <li>Supports a policy that promotes the values of indigenous biodiversity however this policy does not allow for anything other than maintenance or enhancement of indigenous biodiversity. Could preclude some mining activities.</li> <li>Recognises the value of hydrological services and tussock grasslands, but considers there will be some situations where protection is not possible or a sustainable outcome.</li> <li>The policy would not support remediation of tussock grasslands as in the Coronation project.</li> </ul>
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Amend	Amend to clarify how schedule is intended to function, in particular weighting/balancing of criteria, and to ensure it satisfies the requirements of Section 32 of the Act.	<ul style="list-style-type: none"> <li>Inclusion of this Schedule regarded as constructive and promotes transparency of decision making.</li> <li>However, unclear as to how the criteria will be weighed and balanced, as amongst themselves and then as against the "other factors" not identified in the Schedule but may be considered.</li> <li>The Schedule has not been evaluated as required by s32 of the Act.</li> </ul>
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Oppose	Delete	<ul style="list-style-type: none"> <li>Cannot support an objective that states "consumptive use of resources will be directed to areas where adverse effects are more acceptable". This fails to recognise the locationally constrained nature of mining.</li> <li>The RPS needs to recognise in instances where strategically important mineral resources are co-located with regionally important areas of indigenous biodiversity, there is a need to strike a balance.</li> </ul>
43	Highly valued natural resources -	Schedule 5 - Criteria for the	Amend	Amend to include another criteria: " <u>6. Size and</u>	<ul style="list-style-type: none"> <li>Inclusion of this Schedule is regarded as constructive and promotes</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	indigenous biodiversity	assessment of significant indigenous vegetation and habitat of indigenous fauna		Scale." • Clarify what is meant by the note beneath the Schedule. • Ensure it satisfies the requirements in s32 of the Act.	transparency of decision making. • "Size and Scale" of the area of indigenous vegetation or habitat should be included as it is relevant to significance (i.e. population numbers, spatial distribution, the proportion of indigenous species present in percentage terms, size or area in a site-wide and regional context). • It is not clear what the note below the Schedule means for decision makers or plan users. • The Schedule has not been evaluated as required by s32 of the Act.
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	• Amend (a) to read: "a) <u>avoiding, remedying or mitigating</u> adverse effects..." • Amend (b) similarly. • Delete (d) and . • Amend to read: "Protect and enhance <u>Manage effects on</u> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna <u>from the effects on inappropriate activities</u> , by: ... (d) Remediating when adverse effects <u>including significant adverse effects</u> cannot be avoided or remediated; (e) Mitigating where adverse effects <u>including significant adverse effects</u> cannot be avoided or remediated; and" • Clarify that this policy needs to be read subject to Policy 4.5.6	• The term "avoid" in (a) is not appropriate in light of King Salmon. • The relationship with Policy 4.5.6 needs to be clear. • There should not be an explicit hierarchy avoid-remedy-mitigate. This should be considered on a case by case basis.
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	• Amend (a) to read: "a) <u>Avoiding, remedying or mitigating</u> adverse effects..." • Amend (b) similarly. • Delete (d) and (e).	• The term "avoid" in (a) is not appropriate in light of King Salmon. • Coronation project would have been contrary to this Policy. • The relationship with Policy 4.5.6 needs to be clear. • There should not be an explicit hierarchy avoid-remedy-mitigate. This should be considered on a case by case basis.
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Oppose	Delete.	• This policy appears to elevate special amenity landscapes and highly valued natural features by giving them equal protection to outstanding features in Policy 2.2.4. • These "lesser" areas should receive less protection. • There is not acknowledgement of Policy 4.5.6.
54	Highly valued natural resources - outstanding water bodies	Policy 2.2.12 - Identifying outstanding water bodies and wetlands	Amend	• Amend to clarify whether there is a priority ranking and if necessary how many factors must be met to become an outstanding water body. • Add some reference on how "significance" is determined.	• It is not clear how these criteria are ranked, if at all. • Queries whether only meeting one criterion is sufficient to result in a water body being identified as outstanding. • Further (c), (d) and (e) refer to "significant" values, but it is not clear how "significance" will be determined, or by whom.
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend: "a) <u>Avoiding, remedying or mitigating</u> significant..."	Avoiding these effects may not always be possible.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Amend: "a) <u>Avoiding, remedying or mitigating</u> significant..."	Reconsider use of the term "Avoiding". There may be circumstances where effects on these values are justified.
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Support	Support.	No reason given.
76	Objectives on resilience, health	Objective 3.1 - Protection, use	Support	Support.	For mining this means that to sustain the activity there needs to be

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	and safety	and development of natural and physical resources recognises environmental constraints			access to the mineral resource. This in turn means that where the resource coincides with other values such as high landscape or ecological values, an "avoid adverse effects" policy setting such as is included in parts of Part B Chapter 2 is not appropriate.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Add a new b) iii: " <u>Reduction of natural hazard risk to acceptable levels</u> ".	Risks posed by natural hazards such as earthquakes can be appropriately managed by adopting conservative assumptions in the design of structures so they will still function under significant seismic shaking.
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<ul style="list-style-type: none"> <li>• Define what "development" of rural land means.</li> <li>• Limit (c) to infrastructure associated with domestic activities.</li> <li>• Delete (d).</li> </ul>	<ul style="list-style-type: none"> <li>• Major new commercial or industrial development may give rise to infrastructure requirements that are "unplanned" in the sense that they arise at a time outside a council's planning cycle. Policy (c) should not apply to such situations.</li> <li>• New activities may compete for resources. The RMA and the market provide for this. The RPS should be encouraging more efficient use of resources.</li> <li>• Primary production should be defined and include mining.</li> </ul>
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Support	Support.	Support particularly recognition that hazardous substances are essential components of activities such as mining.
130	Hazardous substances and waste	Policy 3.9.1 - Integrating management of hazardous substances and waste	Support	Support.	No reason given.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend c) to say: "c) Avoiding <u>unintended discharges and minimise other adverse effects...</u> "	<ul style="list-style-type: none"> <li>• Queries whether this is necessary and duplicates HSNO requirements.</li> <li>• This policy is overly restrictive, particularly (c). The storage of mine tailings is likely to have some adverse effects on some values, and as currently worded the policy seeks to avoid the activity altogether. This is not appropriate.</li> </ul>
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Support	Support.	No reason given.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Oppose	Delete.	<ul style="list-style-type: none"> <li>• This policy will prohibit many activities on the HAIL list from occurring (e.g. mining, livestock dips, spray irrigation etc.), and as it stands is not practicable.</li> <li>• The adverse effects of land contamination are adequately covered by other objectives and policies.</li> </ul>
143	Objectives on use and enjoyment of natural and built environment	PRAs and explanations - Use and enjoyment of natural and built environment	Amend	Amend [the introduction to Chapter B4 (p. 75)] as follows: "The use of natural and physical resources underpins economic and community activity in Otago. <del>However due to the dynamic and highly interconnected nature of the environment the sustainable management of our resources requires consideration of the adverse effects of resource use on the environment and on other resource users and to promote the economic, social and cultural wellbeing of the people and communities of Otago the use of natural and physical resources should be enabled to the greatest extent consistent with the concept of sustainable management.</del> "	This chapter should focus on enabling use, and provides a much needed balance to the environmental protection focus of Chapter 2.
148	Historic heritage	Policy suite 4.2 - Historic heritage resources are recognised and contribute to the region's	Support	Consider the Heritage New Zealand Pouhere Taonga Act in setting criteria for identifying historic heritage values in Schedule 7 and avoid	<ul style="list-style-type: none"> <li>• Concerned to avoid unnecessary overlap or duplication with Heritage New Zealand processes.</li> <li>• Concerned with RPS (and subordinate plan) requirements that are</li> </ul>



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		character and sense of identity		creating a more onerous or duplicate system.	more onerous than in the Heritage New Zealand Pouhere Taonga Act.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Amend [as follows]: "Protect <u>Manage</u> and enhance... ... c) Avoiding, <u>remedying or mitigating</u> adverse effects... d) Avoiding, <u>remedying or mitigating</u> significant adverse effects..."	<ul style="list-style-type: none"> <li>• There is no need to restrict to just "avoiding" adverse effects. For mining, avoidance is sometimes impossible and the policy needs to provide more flexibility.</li> <li>• This is a more onerous policy than the existing RPS policy on managing historic heritage. Existing policy appears to have been effective, does it need to change?</li> </ul>
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for economic production	Support	Support.	Mining is a highly productive use of land.
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Amend: "b) <u>Minimising Mitigat[ing]</u> the loss..."	"Mitigate" is a well understood RMA term.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	Amend to expressly allow for the continuation of existing industrial activities.	Provision should expressly allow for the continuation of existing industrial activities.
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	<ul style="list-style-type: none"> <li>• Amend (a) to recognise that sometimes mineral deposits and the values in (a) will coincide.</li> <li>• Suggested wording [as follows]: "a) Providing for these activities in sensitive, significant, or outstanding areas, and recognising they are not inappropriate and may give rise to unavoidable adverse effects, but that any such effects need to be remedied, mitigated or compensated for."</li> </ul>	<ul style="list-style-type: none"> <li>• The heading of this policy is encouraging, but the wording largely misses the mark.</li> <li>• The policy does not provide helpful guidance for when mining will coincide with areas identified in a).</li> <li>• Avoiding adverse effects on those values would mean foreclosing on the opportunity to develop the mineral resource and this will not be in the interests of Otago, and is inappropriate.</li> </ul>
161	Objectives on use and enjoyment of natural and built environment	Objective 4.4 - Otago's communities can make the most of the natural and built resources available for use	Support	Support.	No reason given.
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	Add: "e) <u>Where water is used for commercial purposes, giving preference to activities that make the best economic use of water.</u> "	Not all uses of water are of equal value; e.g. ore processing higher value than dairying or cropping. These factors should be relevant considerations when decisions are made about allocation of water and efficient use.
166	Objectives on use and enjoyment of natural and built environment	Objective 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Amend	Replace the word "minimised" with "mitigated".	There are many instances where negative effects from economic activities cannot be avoided or minimised. In such circumstances they could possibly be mitigated.
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Amend	Amend to make provision for instances where objectionable discharges can be mitigated. Amend to say: "Avoiding, <u>remedying or mitigating</u> objectionable discharges Avoid, <u>remedy or mitigate</u> discharges that are objectionable..."	Use of the term "avoid" is prescriptive and could lead to some activities being precluded which are able to be mitigated.
169	Management of adverse effects	Policy 4.5.2 - Applying an adaptive management approach	Support	Support.	This policy is consistent with the way Oceana Gold's existing resource consents are framed.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	<ul style="list-style-type: none"> <li>• Amend: "<u>Minimise Mitigate</u> adverse effects..."</li> <li>• Delete (a) and (b) and replace with: "<u>Providing for these activities in sensitive, significant, or outstanding areas, and recognising they are not inappropriate and may give rise to unavoidable adverse effects, but that any such effects need to be remedied, mitigated or compensated for.</u>"</li> <li>• Amend d) as follows: "d) <u>Avoiding, remedying or mitigating</u>..."</li> <li>• Amend h) as follows: "h) Applying a</li> </ul>	<ul style="list-style-type: none"> <li>• Supports the idea of a specific policy concerning the management of the effects of mineral activities. The relationship of this specific policy to the more general policies, particularly those in Part B Chapter 2, should be explicit and this policy needs to predominate.</li> <li>• Overall objective is not to minimise adverse effects but to ensure adverse effects are mitigated.</li> <li>• Paragraph (a) is inappropriate as the location of minerals is fixed.</li> <li>• Paragraph (b) is not likely to be achievable for large scale developments, need options to remedy, mitigate and compensate.</li> </ul>

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				precautionary approach (including through the use of adaptive management) to assessing the effects..."	
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Oppose	Delete.	This policy is poorly worded and confused. It is not needed in the RPS. Offsetting can be dealt with in plans and consent applications if appropriate.
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Oppose	Delete.	This policy is poorly worded and confused. It is not needed in the RPS. Offsetting can be dealt with in plans and consent applications if appropriate.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Support	Support 4.1.1(c).	<ul style="list-style-type: none"> <li>Submitted on Policy 3.2.6 which is referred to in Method 4.1.1.</li> <li>Oceana Gold supports the use of adaptive management techniques to address natural hazard risk.</li> </ul>
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Retain 4.1.11 but make it clear that restriction of access will not be an appropriate response where adverse effects are capable of being remedied or mitigated.	<ul style="list-style-type: none"> <li>Submitted on Policy 1.2.3 which is referred to in Method 4.1.11.</li> <li>Does not support restriction of access to these areas as an appropriate response if adverse effects cannot be avoided but are capable of being remedied or mitigated.</li> </ul>
226	Anticipated Environmental Results	Anticipated Environmental Results - General	Amend	Add new AER [as follows]: <u>"Otago's highly valued mineral resources, which are a source of regional development, are appropriately used and developed.</u> <u>Indicator:</u> <u>Mineral extraction activities are maintained or increased in Otago.</u> <u>Mineral extraction activities are provided for in sensitive, significant, or outstanding areas, and unavoidable adverse effects are remedied, mitigated or compensated for.</u> <u>How indicators can be measured:</u> <u>The number of consents for mineral extraction activities."</u>	Introduce a new AER that recognises appropriate use and development of Otago's highly valued mineral resources, as a source of the region's development potential.
229	Anticipated Environmental Results	AER 2.1 - The extent of, and values of, significant and highly valued natural resources and heritage in Otago are protected or enhanced	Amend	Retain but make it clear that some natural resources, like minerals, by their very nature are consumptively used and cannot be preserved and "no net loss" cannot be achieved.	<ul style="list-style-type: none"> <li>Does not support an approach that might seek to protect/preserve Otago's mineral resources for future generations.</li> <li>Mining, which forms part of the primary production sector, relies on the quality and quantity of the mineral resource, and the ability to access and extract it economically.</li> <li>Minerals extraction is not an industry where alternatives to extraction such as preservation are practicable. A "no net loss" approach to mineral resources is not possible.</li> </ul>
230	Anticipated Environmental Results	AER 2.2 - Otago's water bodies support healthy ecosystems, are safe for swimming, and maintain their natural form and character	Amend	Retain but make it clear that some activities, like mining, are locationally constrained and may degrade wetlands and in these instances adverse effects can be remedied, mitigated or compensated.	<ul style="list-style-type: none"> <li>There is no provision in the RPS for any degradation of beds of rivers and lakes, wetlands, and their margins. This is not in keeping with sound resource management principles.</li> <li>Eg at Macraes Mine creation of a pit or waste rock stack may require destruction of wetlands, and there may not be overall maintenance or enhancement of the number, extent and health of wetlands.</li> </ul>
233	Anticipated Environmental Results	AER 2.5 - The health and diversity of Otago's ecosystems is maintained or enhanced	Amend	Retain but make it clear that there will be some circumstances where maintenance or enhancement may not be possible.	Not appropriate to require "avoidance" of all adverse effects, therefore it may not be possible to "maintain or enhance" these matters.
245	Anticipated Environmental Results	AER 4.3 - The effects of current human land management do not preclude future economic uses of land	Amend	Retain but delete " <del>Measures to avoid land contamination are promoted</del> ".	<ul style="list-style-type: none"> <li>Submitted that Policy 3.9.5 should be deleted.</li> <li>Does not support reference in this AER to avoiding land contamination.</li> </ul>
249	Glossaries	Glossary	Amend	Add a definition of primary production which includes farming, mining, forestry and fishing	Throughout the RPS it is not clear that mining is included within the description of the primary production sector. Mining is an economically important primary production activity in Otago, and especially in the Waitaki District where Macraes Mine is mostly located. To avoid

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258	Other comments	Consequential amendments & other amendments providing relief	Amend	<ul style="list-style-type: none"> <li>Seeks any similar relief with like effect which addresses the submitter's concerns.</li> <li>Seeks such other relief as may be necessary or consequential upon:               <ol style="list-style-type: none"> <li>the specific relief discussed in the table in the submission</li> <li>the general relief sought at paragraph 9 of the submission.</li> </ol> </li> </ul>	<p>confusion a definition could be added.</p> <p>No reason given.</p>
265	Chapter B2 - High quality natural resources	Outcome 2 and introduction	Amend	Retain [the introduction to Chapter 2 (p. 23)] but [add the following at the end]: " <u>However, it is important to recognise that some economic activities such as mining consumptively use natural resources and by their very nature these resources cannot be preserved for future generations.</u> "	<ul style="list-style-type: none"> <li>Supports recognition that Otago's economy is reliant on natural resources including minerals.</li> <li>Does not support an approach that might seek to protect/preserve Otago's mineral resources for future generations. Mineral extraction is not an industry where alternatives to extraction such as preservation are practicable.</li> <li>Should make it clear that some natural resources, like minerals, by their very nature are consumptively used and cannot be preserved. In many instances inappropriate to protect or preserve them for future generations.</li> </ul>
269	Objectives on high quality natural resources	Introduction to Objective 2.1	Amend	Suggested wording for [the introduction to] Objective 2.1 [p. 26]: "A good quality resource management framework addresses all the values attached to our resources, and identifies those which need protection. <u>A good quality resource management framework also addresses when and where economic development may occur (such as minerals location Policy 4.3.6 and minerals extraction Policy 4.5.6) and where their adverse effects are managed then they should be able to take place in areas where the resources are identified for protection.</u> "	<ul style="list-style-type: none"> <li>Mineral extraction will have unavoidable adverse effects, and some of these effects are in relation to areas or resources of significance.</li> <li>All of the policies implementing Objective 2.1 are focussed on protection with no evidence of the "balancing" mentioned in Objective 2.1.</li> <li>Link to Objective 4.5 and its associated policies required to resolve ambiguity as to whether mineral extraction is permitted to have adverse effects on the environment. Objective 4.5 and its associated policies should override some of these policies.</li> <li>Wording of "avoided" must not apply to effects from mineral extraction, rather, those effects need to be managed, or avoided, remedied or mitigated.</li> </ul>

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6	Overall approach	Schedule 3 - Significance threshold	Support	Adopt as notified.	<ul style="list-style-type: none"> <li>Provides clear direction on determining whether an effect is 'significant' in terms of the Proposed RPS.</li> </ul>
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend as follows: "The values of Otago's natural and physical resources are recognised, maintained and <u>where appropriate</u> , enhanced"	<ul style="list-style-type: none"> <li>Objective 2.1 is a directive provision that is wide-ranging and unjustifiably restrictive.</li> <li>Concern about the potential implications the Objective may have on future regional and district plan development.</li> <li>Objective 2.1 simply refers to the 'values' of natural and physical resources, without placing a qualifier on these values such as 'significant'.</li> <li>Objective 2.1 can be interpreted as requiring that all 'values' be maintained and enhanced. However, only those values of natural and physical resources that are of significance should be maintained and enhanced.</li> <li>Objective 2.1 should be amended to provide for a case-by-case approach.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend as follows: "Recognise freshwater values, and manage freshwater, to: ... f) <u>In accordance with established water objectives, maintain good water quality,</u>	<ul style="list-style-type: none"> <li>Clause 'f' should be linked to 'freshwater management unit targets' associated with the work that is required under the NPSFM.</li> <li>Policy 2.1.1 should be supported by methods that promote extensive consultation (including with industry stakeholders), recognition of community aspirations and the values of various catchments.</li> </ul>

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				including in the coastal marine area, or enhance it where it has been degraded; and ..."	<ul style="list-style-type: none"> <li>Water quality limits should be socially, economically, as well as environmentally, achievable.</li> <li>Method 3: Regional Plans is the most relevant method to achieve Policy 2.1.1</li> </ul>
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend as follows: "Recognise air quality values, and manage air quality, to: a) <del>Maintain good</del> Set ambient air quality standards that supports human health, or enhance air quality where it has been degraded; and b) <del>Maintain air quality in accordance with established air quality standards, or enhance it where it has been degraded; and ..."</del>	<ul style="list-style-type: none"> <li>Policy 2.1.4 provides little in the way of direction around how air quality values are to be recognised, determined or measured. This creates uncertainty in terms of the point at which an enhancement response may be triggered and/or the baseline whereby air quality is considered to be 'good' or 'degraded'.</li> </ul>
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Support	Adopt as notified.	<ul style="list-style-type: none"> <li>Provides high-level policy direction in relation to managing the pressure generated by 'non- productive land use activities' demand for productive land.</li> </ul>
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Support	Adopt as notified.	<ul style="list-style-type: none"> <li>Objective is appropriately balanced. It relates only to 'significant' and 'highly-valued' natural resources as opposed to natural resources in a general sense.</li> <li>Although the term 'highly-valued' is somewhat ambiguous when the Objective is read alone the Objective is supported by a number of policies that either prescribe the criteria, or cross reference to a schedule.</li> </ul>
54	Highly valued natural resources - outstanding water bodies	Policy 2.2.12 - Identifying outstanding water bodies and wetlands	Support	<ul style="list-style-type: none"> <li>Adopt Policy 2.2.12 as notified</li> <li>That policy 2.2.12 be supported by a schedule within the Proposed RPS that provides additional direction around the specific values under each of the six criteria.</li> </ul>	<ul style="list-style-type: none"> <li>The criteria for determining whether a water body (or wetland) is 'outstanding' appear to be appropriate but lack detail, consequently water bodies that are not 'outstanding' may be captured by Policy 2.2.12.</li> <li>The criteria make no specific reference to indigenous biodiversity or water quality values.</li> <li>The Policy would benefit from the inclusion of a supporting schedule that provides additional direction around the specific values under each of the six criteria.</li> <li>The inclusion of a schedule would be consistent with the approach to other matters such as 'historic heritage'. The King Salmon decision promotes this approach whereby the attributes that contribute to the 'outstanding' nature of the waterbody are identified.</li> </ul>
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Support	<ul style="list-style-type: none"> <li>Adopt Policy 2.2.14 as notified</li> <li>That policy 2.2.14 be supported by a schedule within the Proposed RPS that provides additional direction around each of the four criteria listed under Policy 2.2.14.</li> </ul>	<ul style="list-style-type: none"> <li>Supports the direction provided within the Policy to identify areas and values of highly valued soil resources, specifically referring to versatility for primary production as one of the criteria under clause 'a'.</li> <li>The RPS does not provide a set methodology for assessing a given soil resource against the criteria listed in Policy 2.2.14. This creates uncertainty in terms of how effective the Policy might be.</li> <li>There appears to be a gap in the methods for achieving Policy 2.2.14 (Methods 2 and 6) as there is no requirement to identify highly valued soil resources in regional or district plans.</li> </ul>
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	<ul style="list-style-type: none"> <li>Amend as follows: "Protect the values of areas of highly valued soil resources, by:...</li> <li>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</li> <li>d) <del>Recognising that urban expansion may be appropriate due to location and proximity to existing urban development and infrastructure."</del></li> </ul>	<ul style="list-style-type: none"> <li>Supports the direction provided under clauses a) and b).</li> <li>Clause d) does not sit comfortably within the Policy as it seeks to 'recognise' that urban expansion into areas of highly valued soil resource may be appropriate due to proximity to existing urban development and infrastructure. This creates tension and uncertainty within the Policy.</li> <li>The matters sought to be addressed by clause d) are provided for under Policy 3.8.3.</li> </ul>

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				<ul style="list-style-type: none"> <li>• OR as alternative relief, provide for Policy 2.2.15 d) as a standalone policy.</li> </ul>	
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Support	Adopt as notified.	Provides useful guidance and the direction provided is not dissimilar to that provided under Objective C1 of the NPSFM 2014.
62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Amend	Amend as follows: “Apply an integrated management approach to activities in freshwater catchments, by: a) <del>Establishing and u</del> Using consistent freshwater objectives for interconnected water bodies; and ... c) Coordinating the management of land use and freshwater, to: i. Maintain or enhance freshwater values <u>as established by the freshwater objectives; ...”</u>	<ul style="list-style-type: none"> <li>• Clause c) is consistent with clause a) of Policy C2 of the NPSFM 2014, but simply refers to 'values' that are to be maintained or enhanced without providing a point of reference as to what these 'values' are or the means by which they are measured. The freshwater 'values' referred to in clause 'c' should be linked to the freshwater objectives referred to in clause 'a'.</li> <li>• Clause a) should refer to the setting/establishing of freshwater objectives.</li> <li>• Regional Plans are required to give effect to the NPSFM which proscribes the process for setting fresh water objectives.</li> </ul>
64	Natural systems and interdependencies	Policy 2.3.5 - Applying an integrated management approach for airsheds	Amend	Amend as follows: “Apply an integrated management approach to activities that affect air quality, by: a) Setting emission standards for airsheds that take into account foreseeable demographic <u>and associated land use</u> changes, and their effects on cumulative emissions; and b) Co-ordinating the management of land use and air quality, to: i. Maintain or enhance air quality values <u>in accordance with established air quality standards; and</u> ii. Reduce the potential for adverse health and nuisance effects; <u>and</u> iii. <u>Minimise reverse sensitivity effects on established activities.”</u>	<ul style="list-style-type: none"> <li>• Generally supportive of the integrated management approach for air sheds advanced under Policy 2.3.5, which is consistent with the overall integrated resource management approach of the RPS.</li> <li>• The use of the term 'demographic changes' in clause a) is too narrow and should also encapsulate changes in land use in a general sense. Whilst demographic/population changes affect land use patterns, it is the land use change that results in effects.</li> <li>• Policy 2.3.2 provides little in the way of direction around the setting of emission standards.</li> <li>• Co-ordinated management of land use and air quality should take into account potential reverse sensitivity effects on existing lawfully established activities/industries that discharge to the air, in particular where these activities operate in accordance with industry best practice.</li> </ul>
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Support	Adopt as notified.	<ul style="list-style-type: none"> <li>• The objective seeks to manage urban growth in a manner that is efficient (in terms of the use of the existing urban land resource and existing infrastructure) and effectively integrates with adjoining urban and rural environments.</li> <li>• The Proposed RPS identifies that concentrating activities in urban areas can reduce the pressure on productive land.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Support	Adopt as notified.	<ul style="list-style-type: none"> <li>• Supports policy and clause c) i. in particular, as it provides high level policy direction for city and district councils that, in identifying areas for future growth, adverse effects on rural productivity (including high value soils) are to be minimised.</li> <li>• The policy is well-balanced and appropriately addresses the submitter's interests within the region.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend as follows: “Manage subdivision, use and development of rural land, to: ... b) <del>Have particular regard to whether the proposal</del> <u>Avoid development or fragmentation of land that</u> will result in a loss of the productive potential of highly versatile soil, unless: ... ii. <del>Where highly versatile soils are needed for urban expansion, any</del> <u>The</u> change of land use from rural activities achieves an appropriate and	<ul style="list-style-type: none"> <li>• Policy 3.8.3 provides direction on the management of rural land in terms of fragmentation induced by urban expansion or growth and is relevant to submitter's interests in terms of the management of potential pressures on the rural productive land resource associated with urban expansion.</li> <li>• Sub-clause a). sets appropriate direction in terms of development, fragmentation and primary production.</li> <li>• The use of the phrase 'have particular regard to' in clause b) is not sufficiently directive to be effective in terms of managing effects of development and urban expansion on highly valued soil resources.</li> </ul>

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				highly efficient form of urban development; and ..."	<ul style="list-style-type: none"> <li>Sub-clauses b).-iii. provide exceptions where the loss of highly valued soils are not required to be considered. Other development or expansion of land not covered by these exceptions should be required to avoid the loss of soils that have been identified as being highly valued.</li> </ul>
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Amend as follows: Objective 3.9 <del>The effects of</del> Hazardous substances and waste materials <del>do not harm on</del> human health <del>or</del> and the quality of the environment in Otago <u>are appropriately managed.</u>	<ul style="list-style-type: none"> <li>Objective 3.9 could be interpreted as requiring outright avoidance of effects and does not fully reflect the outcomes sought under the RPS as described in the explanation.</li> <li>The explanation identifies that hazardous substances are dangerous but essential components of some activities and seeks to manage the production, use and disposal of the same to avoid creating environmental problems or adversely affecting human health.</li> <li>The RMA is not a 'nil effects' statute.</li> <li>Policy 3.9.2 provides a comprehensive description of what management responses are anticipated under the RPS.</li> </ul>
130	Hazardous substances and waste	Policy 3.9.1 - Integrating management of hazardous substances and waste	Support	Adopt as notified.	Supports the integrated management approach of the RPS
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend as follows: "Policy 3.9.2 Managing the <u>manufacture</u> , use, storage and disposal of hazardous substances, and the storage and disposal of waste materials Manage the <u>manufacture</u> , use, storage, <u>handling</u> and disposal of hazardous substances, and the storage and disposal of waste materials, to avoid accidental spillage or release of those substances and materials, by: ... c) <del>Avoiding</del> <u>Managing</u> adverse effects of those substances and materials on the health and safety of people, and on <del>other values</del> <u>the quality of the Otago environment</u> ; and d) Providing for the development of facilities to safely <u>manufacture</u> , store, transfer, process, handle and dispose of hazardous <del>waste</del> <u>substances</u> and waste materials; ... f) Restricting the location of activities that may result in reverse sensitivity effects near: i. Authorised facilities for hazardous substance <u>manufacture</u> , <u>storage</u> , treatment or disposal; ..."	<ul style="list-style-type: none"> <li>Manufacturing and processing activities are integral elements to the management and use of hazardous substances and, as such, should be recognised and provided for in the same manner as use, storage and disposal activities.</li> <li>The use of the term 'avoiding' in clause c) is too restrictive, particularly given the reference to 'other values'. It is uncertain what 'other values' may or may not encapsulate. The suggested amendment in clause c) ensures consistency with Objective 3.9.</li> <li>Clause 'd' should incorporate hazardous substance facilities generally, not just those that deal with waste products.</li> <li>Facilities used for the manufacture, storage, processing, handling and disposal of hazardous substances should be recognised and provided for in the same manner as those for the transfer, processing and handling of hazardous waste and waste materials.</li> <li>Clause f) provides useful direction in terms of reverse sensitivity effects but should also capture hazardous substances facilities generally and not just those that treat and dispose of hazardous substances.</li> <li>Hazardous substance manufacturing and processing activities in particular are also often subject to reverse sensitivity effects.</li> </ul>
135	Hazardous substances and waste	Policy 3.9.6 - Encouraging use of best management practices for hazardous substance use	Amend	Amend as follows: "Encourage the use of best management practices to prevent or mitigate adverse effects of the use of hazardous substances on the environment, <del>including reducing their use.</del> "	<ul style="list-style-type: none"> <li>Generally supportive of the direction provided by Policy 3.9.6</li> <li>Whilst a reduction in the use of hazardous substances is one means by which to mitigate the effects of hazardous substances, there is no need to single this out within the Policy. This matter should be addressed through best management practices as required by Method 11.</li> </ul>
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for economic production	Support	Adopt as notified.	<ul style="list-style-type: none"> <li>Supports that the proposed RPS recognises that the use of land for productive activity underpins the economy of the region and that the Objective seeks to ensure that sufficient land is available for rural production.</li> <li>Managing the efficient use of land may also require the management of other land use activities where significant historical investment or future productive potential may be adversely affected by competing or conflicting activities.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Support	Adopt as notified.	<ul style="list-style-type: none"> <li>The Policy is well-balanced and provides appropriate high level policy direction for the development of City and District Plans.</li> </ul>
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Support	Adopt as notified.	The Policy is well-balanced and provides appropriate high level policy direction for the development of City and District Plans.
166	Objectives on use and enjoyment of natural and built environment	Objective 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Amend	Amend as follows: "Objective 4.5 Adverse effects of using and enjoying Otago's natural and built environment are <del>minimised</del> <u>appropriately managed</u> "	<ul style="list-style-type: none"> <li>Objective 4.5 may be interpreted as seeking to minimise all adverse effects regardless of their magnitude or significance.</li> <li>Objective 4.5 is inconsistent with the explanatory note to the Objective, which refers to the consideration of both managing adverse effects and maintaining and enhancing environmental values.</li> <li>A more appropriate direction (and one that is more closely aligned with the explanatory note to the Objective) would be that adverse effects are 'appropriately managed'.</li> </ul>
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Amend	Amend as follows: "Avoid <del>Minimise</del> discharges that are objectionable or offensive to takata whenua and the wider community, including: ... b) <u>New or additional</u> <del>d</del> Discharges of hazardous or noxious substances close to sensitive activities, including: ..."	<ul style="list-style-type: none"> <li>The requirement for outright avoidance of the discharges is inappropriate. A more appropriate direction would be the 'minimisation' of objectionable and offensive discharges. This would be consistent with the overall outcome sought by Objective 4.5 as notified. The term 'minimisation' is also well understood and has been defined in case law.</li> <li>Clause b) is appropriate when applied to new discharges.</li> <li>Reverse sensitivity effects on activities that discharge is also an issue in relation to the management of discharges, but is generally provided for elsewhere in the Proposed RPS.</li> </ul>
188	Method 3 - Regional Plans	Method 3 - Regional Plans	Amend	<ul style="list-style-type: none"> <li>Amend Method 3: Regional Plans to include a method for the setting of air quality standards that includes the requirement for extensive stakeholder and community engagement/consultation.</li> <li>Amend Method 3: Regional Plans to include a requirement that areas recognised as having high value soil resource be identified within regional plans, city and district plans</li> </ul>	<ul style="list-style-type: none"> <li>Air Quality - Method provides little in the way of direction around how air quality values or emission standards are to be recognised, determined or measured. This creates uncertainty in terms of the point at which an enhancement response may be triggered and/or the baseline whereby air quality is considered to be 'good' or 'degraded'.</li> <li>Air Quality - Concerns in relation to the need to avoid potentially significant adverse social and economic effects associated with setting emission standards without first undertaking extensive stakeholder and community engagement/consultation.</li> <li>High value soil - The identified methods for achieving Policy 2.2.14 (Methods 2 and 6) do not include a requirement to identify highly valued soil resources in Regional or District Plans.</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Did not specify	Amend Method 3: Regional Plans as follows: " <u>3.1.6 Regional Plans will establish freshwater management units and associated freshwater objectives in accordance with the National Policy Statement for Freshwater Management 2014.</u> "	<ul style="list-style-type: none"> <li>Regional plans are required to give effect to the NPSFM, which, at section CA (Policies CA2 through CA4) prescribes the process for setting freshwater objectives.</li> <li>Method 3 provides nothing in the way of direction around the setting of water quality standards/freshwater objectives in accordance with the NPSFM 2014, nor the means or processes by which these standards/objectives are to be determined. This is inappropriate as it creates uncertainty.</li> </ul>
192	Method 4 - City and District Plans	Method 4 - City and District Plans	Support	Adopt as notified.	Method is appropriate as it requires the identification of highly valued soil resources and then the incorporation of appropriate provisions within city and district plans to deliver the outcomes set by Policy 2.1.5.
192	Method 4 - City and District Plans	Method 4 - City and District Plans	Amend	Amend Method 4: City and District Plans to include a requirement that areas recognised as having high value soil resource be identified within city and district plans.	The identified methods for achieving Policy 2.2.14 (Methods 2 and 6) do not include a requirement to identify highly valued soil resources in Regional or District Plans.
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Support	Adopt Method 6, sub-clause 6.1.3 c) as notified.	Method is appropriate as it require the regional council to identify highly valued soil resources and is linked to Method 4 which would require the incorporation of appropriate provisions within city and district plans to deliver the outcomes set by Policy 2.1.5.
220	Method 11 - Advocacy and	Methods 11.1.2 & 11.1.3 -	Amend	Amend as follows:	<ul style="list-style-type: none"> <li>Reduction in the use of hazardous substances should be left to the</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	Facilitation	Promotion by regional, city and district councils - optional		"11.1.3 Regional, city and district councils may: ... d. <u>Promote the use of industry best management practices and compliance with the HASNO Act and supporting regulations, to prevent or mitigate adverse effects of the use of hazardous substances on the environment, including reducing their use wherever practicable;</u> e. <u>In circumstances where no industry best practice currently exists, p</u> Promote the development and adoption of best practice guidelines for the use and management of hazardous substances, <u>and a reduction in hazardous substance use including their use wherever practicable."</u>	promotion of best management practices.
249	Glossaries	Glossary	Amend	Amend the definition of 'highly valued soils' in the Glossary to reflect the suggested new Schedule that provides additional direction around each of the four criteria listed in Policy 2.2.14	<ul style="list-style-type: none"> <li>• The RPS does not provide a set methodology for assessing a given soil resource against the criteria listed in Policy 2.2.14. This creates uncertainty in terms of how effective the Policy might be.</li> </ul>
258	Other comments	Consequential amendments & other amendments providing relief	Did not specify	Any similar amendments with like effect and/ or any consequential amendment that stem from the relief sought.	No reason given.

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	That Objective 2.1 be adopted with the following amendments: "The values of Otago's natural and physical resources are recognised, maintained and <u>where appropriate,</u> enhanced."	<ul style="list-style-type: none"> <li>• Objective 2.1 is a directive provision, is wide-ranging and unjustifiably restrictive.</li> <li>• Objective 2.1 simply refers to the 'values' of natural and physical resources, without placing a qualifier on these values such as 'significant'. To recognise, maintain and enhance all values is inconsistent with the purpose of the RMA.</li> <li>• Given that Objective 2.2 refers to 'values' in broad terms, it is inappropriate that Objective 2.1 seeks to maintain and enhance these values. Policy 2.1 should be amended to provide for a case-by-case approach.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	That Policy 2.1.1 be adopted with the following amendments: "Recognise freshwater values, and manage freshwater, to: ... b) Retain the range and extent of habitats provided by freshwater <u>as appropriate</u> ; and c) Protect <u>the values of</u> outstanding water bodies and wetlands; and ... f) <u>In accordance with established freshwater objectives, m</u> Maintain good water quality, including in the coastal marine area, or enhance it where it has been degraded; and ... l) Protect <u>significant</u> <del>important</del> recreation values; and... p) Maintain the ability of existing infrastructure to operate within their design parameters <u>while providing for the maintenance, upgrading and, as appropriate, the enhancement of the same.</u>	<ul style="list-style-type: none"> <li>• Policy 2.1.1 is overly restrictive.</li> <li>• Uncertainty within Policy 2.1.1 (f) regarding the level of degradation required before an 'enhancement' response is triggered. Clause (f) should be linked to 'freshwater management unit targets' associated with the work that is required of the regional council under the NPSFW.</li> <li>• Concerned that Policy 2.1.1 does not require freshwater values to be managed to maintain the economic and social wellbeing and health and safety of the community, this appears contrary to the purpose of the RMA, as such, an additional clause (clause (q) should be added.</li> <li>• An amendment to clause (p) of Policy 2.1.1 is necessary to enable the maintenance, upgrading and enhancement of existing infrastructure. Clause (p) as notified does not provide for the ability of existing infrastructure to operate outside of its design parameters.</li> <li>• Finally, Pioneer considers that this policy should be supported by methods that promote extensive consultation (including with industry stakeholders), recognition of community aspirations and the values of various catchments, so as to inform how this policy is to be</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<u>g) Maintain the ability of water users to provide for the economic and social wellbeing and the health and safety of the community."</u>	implemented.
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	That Policy 2.1.2 be adopted with the following amendments: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: a) <del>Protect or restore their natural</del> <u>Maintain their functioning in order to provide for key values;</u> and b) Protect <u>the values of</u> outstanding water bodies and wetlands; and c) <u>In accordance with established freshwater objectives, m</u> Maintain good water quality, or enhance it where it has been degraded; and ... e) Retain the range and extent of habitats supported, <u>as appropriate;</u> and ... k) Mitigate the adverse effects of natural hazards, including flooding and erosion; <del>and</del> l) Maintain bank stability <del>;</del> <u>and</u> m) <u>Maintain the ability to use the beds of lakes and rivers to provide for the economic and social wellbeing and the health and safety of the community."</u>	<ul style="list-style-type: none"> <li>• Policy 2.1.2 is overly restrictive.</li> <li>• Amendments sought to ensure consistency with Policy 2.1.1 above, for those reasons that have already been discussed with respect to that policy.</li> <li>• Policy 2.1.2 does not require freshwater values to be used and managed to provide for the economic and social wellbeing and health and safety of the community, an additional clause (clause (m)) should be added to Policy 2.1.2.</li> <li>• Concerned that parts of Policy 2.1.2 could restrict existing activities that utilise freshwater resources. Example given, refer to submission.</li> </ul>
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Support	That Objective 2.2 is retained as notified.	<ul style="list-style-type: none"> <li>• Objective 2.2 as notified is appropriately balanced as, unlike Objective 2.1, it relates only to significant and highly-valued natural resources as opposed to natural resources in a general sense.</li> <li>• While the term 'highly-valued' is somewhat ambiguous when the Objective is read alone, the Objective is supported by a number of policies that either prescribe the criteria, or cross reference to a schedule to the proposed RPS, that identify what is 'significant' or 'highly valued', thus resolving this issue.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	That Policy 2.2.2 be adopted with the following amendments: "Protect and, <u>where appropriate,</u> enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: ..."	The provision requires the protection and enhancement of the values of areas of significant indigenous vegetation and significant indigenous habitats of indigenous fauna. Section 6 of the RMA requires protection of significant indigenous vegetation and significant habitats of indigenous fauna, as such enhancement should only be required in addition to protection, where appropriate.
54	Highly valued natural resources - outstanding water bodies	Policy 2.2.12 - Identifying outstanding water bodies and wetlands	Support	That Policy 2.2.12 be retained as notified.	<ul style="list-style-type: none"> <li>• The criteria are fairly broad and no additional direction/explanation of the criteria is included as a Schedule to the proposed RPS. This potentially creates uncertainty whereby water bodies (or wetlands) that are not necessarily 'outstanding' may be captured by Policy 2.2.12.</li> <li>• Policy 2.2.12 should be supported by a schedule that provides additional direction around the specific values under each of the six criteria.</li> </ul> <p>The inclusion of a schedule providing additional direction would be consistent with the approach to other matters within the proposed RPS such as 'historic heritage', whereby Schedule 7 provides criteria for assessing historic heritage values.</p>
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Support	Retain as notified.	The Objective provides useful guidance at a broad level and notes that the direction stipulated is not dissimilar to that provided under Objective C1 of the NPSFWM.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Amend	<ul style="list-style-type: none"> <li>Amend Policy 2.3.3 as follows: "Apply an integrated management approach to activities in freshwater catchments, by: a) <del>Establishing and using</del> consistent freshwater objectives for interconnected water bodies; and b) Recognising the importance of river morphology, catchment hydrology, natural processes and land cover in supporting catchment values; and c) Coordinating the management of land use and freshwater, to: i. Maintain or enhance freshwater values <u>as established by the freshwater objectives</u>; and ..."</li> <li>Amend Method 3 accordingly (as outlined in submission).</li> </ul>	<ul style="list-style-type: none"> <li>There is no guidance provided within the Methods on achieving Policy 2.3.3 to show how objectives would be developed. As such, Pioneer considers that clause (a) of Policy 2.3.3 should refer to the setting/establishing of freshwater objectives and not just the utilisation of the same.</li> <li>The freshwater "values" referred to in clause (c) should be linked to the freshwater objectives referred to in clause (a).</li> <li>Method 3: Regional Plans should be updated to include reference to the setting of freshwater objectives in accordance with the NPSFWM as previously discussed with respect to Policy 2.1.</li> </ul>
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	<p>Amend as follows: "Assess activities for natural hazard risk, by considering: ... d) Flow-on effects of the risk to other activities, individuals and communities; <del>and</del> e) The availability of, and ability to provide, lifeline utilities, and essential and emergency services, during and after a natural hazard event; <u>and</u> f) <u>The extent to which an activity is functionally required to locate within a natural hazard risk area.</u>"</p>	There are certain activities that should be able to occur in areas sensitive to natural hazards. By their very nature, as they are required to be located close to the resource that they utilise, hydroelectric power generation schemes and ancillary facilities associated with the same are often located in areas sensitive to natural hazards.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Support	Retain as notified.	Policy is appropriate, in that it recognises the national and regional significance of infrastructure that contributes to the social and economic well-being of the Otago Region and New Zealand as a whole.
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	<p>That Policy 3.5.2 be adopted with the following amendments: "Minimise <del>Manage</del> the adverse effects from infrastructure that has national or regional significance <del>by that is to be located within:</del> <del>a) Giving preference to avoiding their location in:</del> i.-iv. [retain] <del>b) Where it is not possible to avoid locating in the areas listed in a) above, avoiding significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and</del> c) Avoiding, remedying or mitigating other adverse effects on values; and <del>d) a) Assessing the significance of adverse effects on those values, as detailed in Schedule 3 ; and taking into account the measures to be implemented to avoid, remedy or mitigate the adverse effects of the proposed infrastructure and also the positive effects associated with the implementation of the same.</del> e)b) Considering the use of offsetting, or other</p>	<ul style="list-style-type: none"> <li>The measures set out in Policy 3.5.2 to manage the adverse effects of infrastructure are overly restrictive and create tension between policy 3.5.2 and 3.5.1.</li> <li>Policy 3.5.2 does not recognise that there are often constraints associated with ensuring infrastructure is located in a position where it can efficiently and effectively operate.</li> <li>If infrastructure of national or regional significance is a required to be located in one of the areas identified in Policy 3.5.2 a) then the proposed RPS should recognise and provide for an assessment of the significance of the values which also considers not only the measures to be put in place to avoid, remedy or mitigate those effects, but also the benefits associated with the overall development of the infrastructure proposed.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				compensatory measures, for residual adverse effects on indigenous biodiversity, <u>that cannot otherwise be appropriately avoided, remedied or mitigated.</u> "	
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Support	Retain Policy 3.5.3 as notified.	Policy 3.5.3 is appropriate, in that it recognises that nationally and regionally significant infrastructure requires protection from new activities that could bring about reverse sensitivity effects that are detrimental to their operation or use.
109	Energy	Policy 3.6.1 - Using existing renewable electricity generation structures and facilities	Amend	Amend as follows: " <del>Give preference to</del> <u>Recognise and provide for</u> the use of existing structures or facilities to increase the region's renewable electricity generation capacity <del>over developing new structures in new locations.</del> "	<ul style="list-style-type: none"> <li>• Pioneer considers that, while it is important to reinforce the contribution that existing renewable energy assets are making in advancing towards the Government's renewable energy target, Policy 3.6.1 as notified reinforces this point at the detriment of new development.</li> <li>• Policy 3.6.1 requires amendment to recognise the importance of existing renewable electricity generation structures without diminishing the importance of new development.</li> </ul>
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	Amend as follows: "Protect the generation capacity of <u>existing, and enable the development of new</u> , nationally or regionally significant renewable electricity generation activities, by: ... b) <del>Restricting</del> <u>Avoiding</u> the establishment of those activities that may result in reverse sensitivity effects; and ..."	<ul style="list-style-type: none"> <li>• Amending the policy to provide for both existing and new renewable generation activity would achieve consistency with the NPSREG, which provides a national direction for energy generation activities.</li> <li>• Pioneer notes that Policy B of the NPSREG explicitly provides for the retention of existing renewable energy generation assets and the development of new renewable generation assets.</li> </ul>
166	Objectives on use and enjoyment of natural and built environment	Objective 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	Amend	Amend as follows: "Adverse effects of using and enjoying Otago's natural and built environment are <del>minimised</del> <u>appropriately managed.</u> "	<ul style="list-style-type: none"> <li>• The potential implications of this Objective for Pioneer are that it will direct the development or amendment of Regional and District Plans within the Otago Region.</li> <li>• Objective 4.5 seeks to achieve the minimisation of all adverse effects, regardless of their magnitude or significance. This appears to be inconsistent with the explanatory note that accompanies the Objective.</li> <li>• Adverse effects should be "appropriately managed". In this respect, the "appropriate" management of effects is addressed through the supporting policies 4.5.1 through 4.5.9.</li> </ul>
178	Methods	Methods - general	Amend	Include an additional method which provides for extensive consultation, regarding the recognition of community aspirations and the values of various catchments, freshwater bodies and their margins so as to inform how Policy 2.1.2 and other similar policies, including Policy 2.1.2 are to be implemented.	Pioneer considers that policy 2.1.1 should be supported by methods that promote extensive consultation (including with industry stakeholders), recognition of community aspirations and the values of various catchments, so as to inform how this policy is to be implemented.
188	Method 3 - Regional Plans	Method 3 - Regional Plans	Amend	That Method 3: Regional Plans be amended as follows: " <u>Regional Plans will establish freshwater management units and associated freshwater objectives in accordance with the National Policy Statement for Freshwater Management 2014.</u> "	<ul style="list-style-type: none"> <li>• Clause 3.1.4 of Method 3: Regional Plans which specifically refers to Policy 2.1.1 but provides nothing in the way of direction around the setting of water quality standards or the means by which these standards are to be determined requires amendment.</li> <li>• Clause 3.1.4 is inappropriate as it creates uncertainty in terms of both the ability to achieve Policy 2.1.1 and, indeed, the direction set by the NPSFWM.</li> </ul>
248	Appendices	Appendices - general	Amend	That Policy 2.2.12 be supported by a schedule with the Proposed RPS that provides additional direction around the specific values under each of the six criteria.	The inclusion of such a schedule would be consistent with the approach taken to other matters within the proposed RPS such as 'historic heritage'.
258	Other comments	Consequential amendments & other amendments providing relief	Amend	<ul style="list-style-type: none"> <li>• Any similar amendments to like effect, and</li> <li>• Any consequential amendments that stem from the amendments set out in the relief</li> </ul>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				sought.	

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Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Amend the use of the term "Avoid", so that effects of inappropriate activity are avoided.	Based on the Supreme Court's decision in the King Salmon case, the drafting of policies and objectives in the RPS now requires greater precision. Subordinate plans are required to give effect to the RPS and in order to do so will, if the RPS says "avoid", have to make provisions that avoid those particular activities or effects relevant to that policy or objective.
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	With regard to the use of the words "values" and "outcomes", amend to specify values and outcomes sought.	<ul style="list-style-type: none"> <li>• These terms are very subjective and not defined. It would be helpful if the actual "values" and "outcomes" referred to were identified.</li> <li>• Schedules 3, 4 and 5 are very subjective and it is unclear how many of the factors need to be met for something to meet the various criteria.</li> </ul>
29	Objectives on high quality natural resources	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Oppose	Insert after "enhanced" "where appropriate".	<ul style="list-style-type: none"> <li>• Objective too wide: requiring enhancement of all the values of Otago's natural and physical resources is too onerous.</li> <li>• No recognition that some economic use of land is location dependent and is not inappropriate despite being inconsistent with the enhancement of "values".</li> <li>• The policies that implement this objective are focused on protection of values without any balance or guidance on when the "managed" values can be affected.</li> </ul>
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	<ul style="list-style-type: none"> <li>• Amend [Policies 2.1.1 - 2.1.8] to explain whether there is a priority ranking or how factors are to be balanced against one another.</li> <li>• Amend to provide for situations where the values can be diminished</li> </ul>	No reason given.
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	<ul style="list-style-type: none"> <li>• Amend (d) so there is an option to maintain or enhance without reference to degradation: "Maintain or enhance coastal water quality; and".</li> <li>• Insert new (j) "Allow for the economic use of and discharges into coastal water within a sustainable range."</li> </ul>	<ul style="list-style-type: none"> <li>• Support coastal water quality and values being maintained or enhanced.</li> <li>• There should be provision for existing discharges to continue without further degrading but also without enhancing water quality.</li> <li>• Economic use should be included in a policy for "Managing for coastal water values".</li> </ul>
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	<ul style="list-style-type: none"> <li>• Insert as (d) "Maintain the ability of existing development and infrastructure to operate."</li> <li>• Amend first sentence to "..., to (after reasonable mixing):"</li> </ul>	<ul style="list-style-type: none"> <li>• Support air quality and values being maintained or enhanced.</li> <li>• There should be provision for existing discharges to continue without further degrading but also without enhancing air quality.</li> </ul>
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend (k) as follows " <u>Where possible</u> avoid contamination of soil <u>that would result in contaminated land and</u> "	The use of the word "contamination" could be interpreted as not using a "contaminant" on soil which, in conjunction with "avoid", could result in restrictions on fertilisers.
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Oppose	Insert after "enhanced" or "distinctiveness", "where appropriate".	<ul style="list-style-type: none"> <li>• Objective too wide: requiring enhancement of all the values of Otago's natural and physical resources is too onerous.</li> <li>• No recognition that some economic use of land is location dependent and is not inappropriate despite being inconsistent with the enhancement of "values".</li> <li>• Important mineral resources may be located with important areas of indigenous biodiversity: there is a need to strike a balance between biodiversity values and the development of mineral resources.</li> <li>• Wording of the objective different on p. 24 with the words "to maintain their distinctiveness" being included. If these words are included then the requirement to enhance distinctiveness is difficult: it is unclear what happens when distinctiveness is already impaired.</li> </ul>
44	Highly valued natural resources -	Policy 2.2.2 - Managing	Amend	• Amend to read: "Protecting the values of	Policy uses "avoiding" in (a) and (b) but then refers to "remediating",

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	indigenous biodiversity	significant indigenous vegetation and significant habitats of indigenous fauna		areas of significant indigenous vegetation and significant habitats of indigenous fauna <u>from the effects of inappropriate activities</u> , by: a) <u>Avoiding, remedying, mitigating or offsetting</u> adverse effects adverse effects... b) <u>Avoiding, remedying, mitigating or offsetting</u> significant adverse effects..." • Or amend paras (a) and (b) by inserting "Where practicable" ahead of "Avoiding".	"mitigating" and "enhancement" subsequently. It is unclear how list items relate to each other. Where not practicable to avoid adverse effects these should be remedied or mitigated.
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	• Amend para (a) by inserting "Where practicable" ahead of "Avoiding". • Or amend para (a) by inserting "remedying or mitigating" after "Avoiding".	There should be provision for remediation or mitigation because the reference to "values" is wide.
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features		• Amend para (a) by inserting "Where practicable" ahead of "Avoiding". • Or amend para (a) by inserting "remedying or mitigating" after "Avoiding".	<ul style="list-style-type: none"> <li>• There should be provision for remediation or mitigation because the reference to "values" is wide.</li> <li>• "Special amenity" should not have same status as outstanding.</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	• Amend para (a) and (b) by inserting "Where practicable" ahead of "Avoiding". • Insert two new paras before (d): " <u>Remediating when adverse effects which contribute to the outstanding or high natural character cannot be avoided; and</u> " " <u>Mitigating where adverse effects which contribute to the outstanding or high natural character cannot be avoided or mitigated.. and</u> "	Avoidance of adverse effects that contribute to outstanding natural character, and of significant effects that contribute to high natural character, is too onerous and should only be required where practicable.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	• Amend para (a) by inserting "Where practicable" ahead of "Avoiding". • Insert a new para (e) " <u>Recognising that quarrying may be appropriate due to location of mineral resource.</u> "	Para a) means that quarrying activity on high value soil would be prevented but urban expansion would not (para (d)). This Policy should recognise other economic uses of high value soil.
63	Natural systems and interdependencies	Policy 2.3.4 - Applying an integrated management approach for the coastal environment	Amend	• Amend para (b) ii. by inserting "increased adverse" ahead of "health and nuisance effects". • Insert a new provision that the coastal and harbour areas also provide a productive environment for economic activity.	<ul style="list-style-type: none"> <li>• Support an integrated management approach to the coast.</li> <li>• Existing activities that have minimal health or nuisance effects should not be required to reduce these effects under para (b) ii.</li> <li>• There should be recognition that the coastal and harbour areas provide a productive environment for economic activity.</li> </ul>
64	Natural systems and interdependencies	Policy 2.3.5 - Applying an integrated management approach for airsheds	Amend	• Amend para (b) ii. by inserting "increased adverse" ahead of "health and nuisance effects". • Insert a new provision that provides for appropriate economic activity.	<ul style="list-style-type: none"> <li>• Support an integrated management approach to the coast.</li> <li>• Existing activities that have minimal health or nuisance effects should not be required to reduce these effects under para (b) ii.</li> <li>• Encourage the inclusion of a provision that recognises and provides for appropriate industry.</li> </ul>
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Support	Retain locational necessity as a factor.	Some activities have significant locational constraints that should be given weight when determining if they are appropriate.
85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Support	Retain consideration of affordability in the assessment of natural hazard risk.	Long-term viability and affordability of measures (para (c)) is an appropriate consideration.
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Support	Retain the management of infrastructure to support economic activities.	Support economic considerations being a factor for infrastructure management.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Retain the recognition of ports as significant infrastructure and insert "shipping routes".	The ability for ships to access wharves for regional economic activity is important.
117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Support	Retain reference to enabling industrial activities in urban environment.	Support enabling industrial activity, where appropriate, as part of good urban design.
127	Urban growth	Policy 3.8.3 - Managing	Amend	• Insert the word "inappropriate" before "avoid"	Activities such as quarrying should be provided for and not get caught

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		fragmentation of rural land		in para (a). • Delete "or other resources" in para (d).	up in urban growth arguments.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Amend para (c) by inserting "Where practicable" ahead of "Avoiding".	To provide for minimal adverse effect on other values.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Amend para (b) by replacing "contamination" with "contaminated land".	"Contaminated land" is defined in the RMA, unlike "contamination".
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	• Retain reference to "contaminated land" and do not expand to include HAIL land. • Insert "inappropriate" after "new".	• The RMA definition of "contaminated land" is land with a hazardous substance with significant adverse environmental effects on the environment. • The RPS should not require the avoidance of new HAIL activities, as would capture land used for mining industries and fertiliser manufacture or bulk storage.
136	Hazardous substances and waste	Policy 3.9.7 - Encouraging services for hazardous substances collection, recycling and disposal	Support	Retain this policy.	Encourage appropriate disposal of hazardous substances.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Insert new para (d) " <u>Protect the economic operations of existing commercial or industrial activity.</u> "	• Support enhancing public access where possible • The factors for restricting access should be expanded to include existing development/industry.
153	Objectives on use and enjoyment of natural and built environment	Objective 4.3 - Sufficient land is managed and protected for economic production	Amend	Replace "production" with "use".	The use of the word "production" could be unintentionally interpreted as economic activity associated with produce so should be replaced with "use" or "activity".
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Support	Retain para (a) "Enabling farming and other rural activities that support the rural economy".	Ravensdown's activities exist to support the rural economy and it is vital that this support is provided for.
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	• Insert at para (b) "and specific location requirements" after "activities". • Retain para (c). • Expressly allow for contamination of existing industrial activities by inserting "d) Enabling existing industrial activities to continue; and", and insert "e) Recognising that industrial land uses may be an appropriate use of contaminated land."	• Ravensdown supports provision of land for industrial activities and restricting incompatible activities. • Locational constraints should be considered when providing land for industry. • Existing industrial activities should be provided for.
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	• Amend para (b) by replacing "may" with "will" and inserting "significant" before "reverse". • Amend to protect mineral reserves from inappropriate land uses.	• Locational constraints are fundamental for quarrying and related processing and should be provided for. These activities should not be restricted where reverse sensitivity effects "may result". • Policy should limit inappropriate land uses that would encroach on a mineral resource and sterilise it.
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Oppose	• Reword to read "Where practicable avoid discharges that are objectionable or offensive at the site boundary to takata whenua and the wider community, including:" • Insert "Objectionable or offensive" at the start of paras (a), (b) and (c).	• This Policy is worded as if all odorous or conspicuous discharges are objectionable or offensive. • This Policy should be reworded to allow for discharges that are not objectionable or offensive at the activity's site boundary. • Some objectionable or offensive discharges should be provided for.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	In para (b) insert "remedying or mitigating" after "avoiding".	• Support recognition of locational constraints for extractive activities. • Depending on how the thresholds for outstanding are applied, in some circumstances it may be appropriate for significant adverse effects on values to be remedied or mitigated.
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Amend para (b) to delete "remedied or mitigated".	• Supports the ability to offset adverse effects on biodiversity values where there is a functional necessity to locate in a significant or outstanding area. • Requiring effects to not be able to be mitigated before allowing

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					offsetting is too onerous. Offsetting is a form of mitigation. • Compensation should also be provided for.
176	Management of adverse effects	Policy 4.5.9 - Offsetting for air quality	Amend	Amend para (a) to replace "breaches" with "is likely to breach".	Ability to offset for air quality should not be restricted to airsheds in breach. Offsets should also apply to airsheds where a breach is likely.
228	Anticipated Environmental Results	AER 1.2 - Kai Tahu values and culture are respected and able to be expressed	Did not specify	[Regarding the 3rd indicator : "The quality of natural resources and resource systems meet cultural health indicator targets"], provide the cultural health indicator targets to submitters to enable them to make an informed decision; and avoid any consequential amendments.	It is difficult to determine whether to oppose or support this when the cultural health indicator targets are not identified in the RPS.
258	Other comments	Consequential amendments & other amendments providing relief	Amend	Any similar relief with like effect which addresses [submitter's] concerns [is sought in addition].	No reason given
258	Other comments	Consequential amendments & other amendments providing relief	Amend	Any consequential amendments which arise from [submitter's] submission, the reasons for the appeal or the relief sought.	No reason given.
290	Objectives on resilience, health and safety	Introduction to Objective 3.9	Amend	Delete "are dangerous" from the second sentence of the introduction to Objective 3.9.	Many hazardous substances are only mildly toxic (as opposed to dangerous).

#### 144 Upper Clutha Conservation Taskforce

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Review and amend the language and rhetoric to be clear and precise. The use of the word "values" needs to be reviewed. Clearly define or replace the word "values".	In regards to the language and rhetoric used in the RPS, the 4 key outcomes need to be addressed in more meaningful aspirational rhetoric.
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	Objectives need to be linked to clear methods and intended operational activities.	In Chapter 2, the "issue" and "needs" statements for each objective need to be simple, clear and distinct.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Change the wording to: "c) Protect, <u>restore and enhance where degraded</u> outstanding water bodies and wetlands; and d) Protect <u>restore and enhance where degraded</u> migratory patterns of freshwater species, unless detrimental to indigenous biodiversity; and"	No reason given.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Change the wording to m): "Maintain the aesthetic and landscape values of rivers, lakes, and wetlands <u>and their margins</u> ; and"	No reason given.
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Clarify the terms "values" and "recognise".	[Policy 2.1.6] includes a good list of intended actions, subject to more clarity on the terms "values" and "recognise".
165	Making the most of available resources	Policy 4.4.3 - Encouraging environmental enhancement	Amend	Remove the word "or" from the end of each item in the list (a) to (j).	No reason given.
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	Add (d): "There is a net increase in biodiversity".	No reason given.
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Amend	[Provide] an unequivocal mandate for the implementation of district biodiversity strategies.	<ul style="list-style-type: none"> <li>• RPS will have direct impacts on what activities are allowed in the region.</li> <li>• The RPS should give effect to the implementation of district and regional biodiversity strategies. Targets should be specific, measurable, attainable, realistic and timely to assist in protecting and maintaining biodiversity.</li> </ul>
259	Overall approach	Regionally significant issues	Amend	Explicitly identify resource management issues including: <ul style="list-style-type: none"> <li>• Degradation of water quality</li> <li>• Biodiversity loss and habitat degradation.</li> </ul>	The resource management issues of the region are not adequately identified as required by S62 of the RMA.

**145 Silver Fern Farms**

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Whole Regional Policy Statement (general support)	Support	Generally supports RPS, but reserves the right to respond to any consequential changes as a result of the submission process.	The RPS has covered the key issues the submitter wishes to be addressed, in terms of water, infrastructure, land use and energy .

**146 Peter and Margaret Hore**

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend to provide greater clarity on the [Water Plan's] Regionally Significant Wetlands fit with the concept [in Policy 2.1.1 (c)].	Unclear how "outstanding water bodies / wetlands" compare with Regional Plan: Water's regionally significant wetlands.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Support	Retain Policy 2.1.1 (d).	Gives indigenous biodiversity greater protection over other freshwater species, in accordance with the RMA.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Replace "avoid" with or "minimise" [in Policy 2.1.1 (n)].	<ul style="list-style-type: none"> <li>• "Avoid" is too restrictive, particularly if it results in a prohibited activity.</li> <li>• Unclear who has onus to avoid the adverse effects of pest species - land owner, ORC or source of the pest (e.g. forestry company). This is particularly problematic with existing pest problems.</li> <li>• "Avoid" is at odds with approach in Policy 4.5.5 which talks about controlling adverse effects.</li> </ul>
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Remove the word "avoid" and replace with "minimise" [in Policy 2.1.5 (k) and (l)].	"Avoid" is too restrictive, particularly if it results in a prohibited activity status. Policy is overly restrictive, unrealistic and impossible to implement and monitor effectively, because any foreign substance can contaminate soil.
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Replace "avoid" with "minimise" [in Policy 2.2.4 (a)].	"Avoid" is too restrictive, particularly if it results in a prohibited activity status.
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Delete [Policy 2.2.4] (b).	<ul style="list-style-type: none"> <li>• Unclear what other values are being protected. If they do not contribute to the area or habitat being significant, they may actually be competing values.</li> <li>• Extends beyond the protection or enhancement of the values that contribute to the area or habitat being significant.</li> </ul>
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Oppose	Delete Policy 2.2.5 and remove reference to special amenity landscapes and highly valued natural features.	<ul style="list-style-type: none"> <li>• There is a large body of case law and practice which assists with the identification of outstanding features and landscapes.</li> <li>• The concept of "special amenity landscapes and highly valued natural features" is new, and the attributes to be used to identify these are the same as those to be used for the identification of outstanding features and landscapes. No guidance is given as to how to differentiate between what is outstanding from what is special or highly valued.</li> </ul>
54	Highly valued natural resources - outstanding water bodies	Policy 2.2.12 - Identifying outstanding water bodies and wetlands	Amend	<ul style="list-style-type: none"> <li>• Provide greater detail of what constitutes a significant value.</li> <li>• Provide clarity around what a hydrological value is.</li> <li>• Provide clarity as to whether all of these criteria need to be present or just one.</li> </ul>	There is a lack of clarity around how these values will be assessed - what is a significant recreational value, or hydrological value? Do all values need to be present? How do the values in (b) get assessed - through reference to the attributes in Schedule 4?
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Replace "avoid" with "minimise" [in Policy 2.2.13].	"Avoid" is too restrictive, particularly if it results in a prohibited activity status.
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Delete [Policy 2.2.13] (b).	Paragraph (b) of the policy adds nothing to what is already in the RMA and is unnecessary.
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	<ul style="list-style-type: none"> <li>• Include highly productive soils.</li> <li>• Include an "or" in the list.</li> </ul>	<ul style="list-style-type: none"> <li>• The criteria in this policy are specific and exclusive and therefore should also include soils that are highly productive (rather than only those that are versatile).</li> <li>• Need more clarity as to whether soils have to meet all the criteria, or</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					just one.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Replace "avoid" with "minimise" [in Policy 2.2.15 a)].	"Avoid" is too restrictive, particularly if it results in a prohibited activity status.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Delete [Policy 2.2.15] (b).	Paragraph (b) of the policy adds nothing to what is already in the RMA and is unnecessary.
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend 3.8.3(a)(i) by replacing "avoid" with "minimise".	Support the principle in (a)(i) of policy, but "avoid" is too restrictive, particularly if it results in a prohibited activity status.
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Amend (d) to make it clearer that primary production is one of the key priority uses for water and soil.	<ul style="list-style-type: none"> <li>It is unclear which effects (d) is aimed at, and how this will be managed under the RMA, which focuses on the effects of activities, and generally operates on a first come first served basis.</li> <li>If it is intended that priority in rural areas is for water and soil to be used for primary production, then more clarity is needed.</li> </ul>
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Replace "avoid" with "minimise" [in Policy 3.9.5].	The use of the word 'avoid' is too restrictive, especially as many rural activities will contaminate land to some extent. "Avoid" is too restrictive, particularly if it results in a prohibited activity status.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	Amend to provide greater clarity as to how competing values and uses might be weighed against each other, possibly by adding another paragraph - "(d) enable water use and storage that adequately mitigates adverse effects on public access".	It is unclear how this policy might impact on water use and storage — how these sometimes competing values might be balanced against each other.
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	Correct the inconsistency between Policy 2.2.14 and Policy 4.3.1(b), by: <ul style="list-style-type: none"> <li>referring to "highly valued soils as outlined in Policy 2.2.14"; or</li> <li>including the full list of criteria contained in Policy 2.2.14.</li> </ul>	Support this policy in general, however (b) seems to be at odds with Policy 2.2.14, as that policy identifies a range of other criteria which may contribute to soils being highly valued.
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Amend	Finish policy after "yield" and delete (a) and (b).	<ul style="list-style-type: none"> <li>Policy too specific in its focus on 2 issues only - forestry and conversion of tussock grasslands - without properly addressing either.</li> <li>Other activities/issues can affect water yield, e.g. wilding pine spread from existing forest.</li> <li>Policy should be more general, and other plans should then address specific issues affecting dry catchments in more detail.</li> </ul>
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	Amend (b) by replacing "requiring" with "give preference to..."	While it is often desirable to require infrastructure that increases efficiency, the wider implications of this policy should be able to be considered, including increasing reliance on infrastructure using fossil fuels and energy. At odds with Policy 3.6.6 "reduce the long term demand for fossil fuels from Otago's communities..."
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	Amend (c) to: "Encouraging collective coordination and collaborative catchment management".	Consider whether (c) leaves the door sufficiently open for different approaches in the future (other than rationing). Policy may be too specific - words such as "collaborative catchment management" may be broader.
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	Provide clarity within the RPS as to how competing values and uses should be evaluated and weighed against each other.	Paragraph (d) may be at odds with other policies in the proposed RPS - e.g. Policy 2.1.1(h) and Policy 2.2.13. Guidance should be provided on how competing policies should be evaluated and weighted, to reduce uncertainty during consent application processes.
207	Method 7 - Strategies and Plans (non-RMA)	Method 7.4 - Pest management strategy	Amend	Include another paragraph: "(iv) have adverse effects on water yield in dry catchments".	<ul style="list-style-type: none"> <li>While the use of the word "including" does not exclude pest species that have other types of adverse effects, it does provide an indication of the types of effects that will be most readily considered.</li> <li>Missing from this list is the effect of pest species on water yield or grazing species.</li> </ul>
224	Method 11 - Advocacy and Facilitation	Method 11.2.2 - Facilitation by regional council - compulsory	Support	Retain [Method 11.2.2(c)].	Indicates ORC will continue supporting water management groups.

### 147 Remarkables Park Limited and Queenstown Park Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
2	Overall approach	Whole Regional Policy Statement (general opposition)	Oppose	That the RPS is revised so that it better reflects the functions of the Regional Council as identified in Section 30 of the Act, and the purpose of Regional Policy Statements, as identified at Section 59 of the Act.	<ul style="list-style-type: none"> <li>In general, the Regional Policy Statement, as currently proposed, is contrary to Part 2 of the RMA because: <ul style="list-style-type: none"> <li>(i) it does not promote sustainable or integrated management;</li> <li>(ii) it does not manage the use, development and protection of natural and physical resources;</li> <li>(iii) it does not avoid, remedy or mitigate adverse effects;</li> <li>(iv) it does not accord with, or assist the regional council to carry out its functions to achieve the purpose of the Act;</li> <li>(v) it does not meet section 32 of the Act;</li> <li>(vi) it does not represent sound resource management practice.</li> </ul> </li> </ul>
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	The RPS objectives and policies give greater recognition of the importance of tourism to the region, both now and into the future.	<ul style="list-style-type: none"> <li>The importance of tourism is addressed at a broad level in the introductory statement, but is not provided for in issues, objectives and policies.</li> <li>Objectives and policies place greater emphasis on primary production and matters such as pest control.</li> <li>The RPS should provide for the future, and recognise the importance to enable diversification while maintaining the quality of the environment.</li> </ul>
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	<ul style="list-style-type: none"> <li>Remove the policies to maintain and enhance resources that are not of regional significance, so that the RPS focuses on those resources that are of regional significance.</li> </ul>	<ul style="list-style-type: none"> <li>Given S30(b), is it correct for the RPS objectives and associated policies to maintain and enhance natural and physical resources that are not significant or highly valued?</li> <li>What is meant by 'highly valued' and how does this relate to Part 2 matters of national importance?</li> <li>The policies instead seem to be managing effects on all Otago's natural and physical resources.</li> </ul>
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Greater clarification as to the location of sites of cultural significance.	In Chapter 1, Kai Tahu values, rights and interests are recognised and katiakitaka is expressed. Schedule 1C includes a list of sites of significance, including AraTawhito, Nohoaka, and Mauka. It is difficult for landowners to determine which mountains are important, and where AraTawhito and Nohoaka are located.
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	<ul style="list-style-type: none"> <li>That the objectives are amended to better reflect the wording of the Act, so that it is clear that it is those landscapes and values that are of national importance that should be protected from inappropriate subdivision, use and development.</li> <li>Allowance needs to be made for subdivision, use and development that is appropriate, and landscapes and natural features do not necessarily need to be protected from such uses.</li> </ul>	<ul style="list-style-type: none"> <li>The reference to the importance of tourism is supported, and it is submitted that this should also recognise the importance of diversification and resilience.</li> <li>RPS needs to identify highly valued natural resources, and how these relate to the outstanding natural landscapes and features, and significant indigenous vegetation and habitats.</li> <li>The objectives could be interpreted to be stronger than Section 6 of the Act, because they propose the protection and enhancement in all cases, and do not identify that the protection should be from inappropriate subdivision, use and development. As drafted, the objectives do not recognise that by default the Act does not require the protection from appropriate subdivision, use and development.</li> <li>It is agreed that resource degradation reduces the attractions Otago can offer, but this needs to be balanced with recognition that land use change can, on balance, be positive both environmentally and economically.</li> </ul>
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	[Reconsider] the value of including Objective 2.1 and associated policies, given that it appears to apply to all natural and physical resources, rather than those of regional or national significance.	<ul style="list-style-type: none"> <li>Differentiation is needed between the values of ecosystems and biodiversity of high value, and those that have been degraded.</li> <li>Policy 2.1.6(e) is too strong by requiring the protection of natural resources and processes that support indigenous biodiversity; protection from what, for what purpose, and what value does the indigenous biodiversity have that warrants its protection?</li> </ul>
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or	Amend	That consideration is given to the wording of policies and whether they can be improved to recognise where possible values should be	Submitter queries why various policies aim for maintenance of ecosystem health, indigenous biodiversity and aesthetic and amenity values, but for natural character it is maintenance and enhancement.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		enhanced		enhanced.	Is natural character more important than indigenous biodiversity?
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	<ul style="list-style-type: none"> <li>• Clarification as to what constitutes outstanding water bodies.</li> <li>• The provisions could also be improved by providing better integration between the policies for outstanding water bodies, infrastructure and discharges.</li> </ul>	<ul style="list-style-type: none"> <li>• There is no guidance to assist in determining what waterbodies are outstanding.</li> <li>• Schedules 3, 4, 6 &amp; 7 provide guidance on how various significant matters are assessed and identified but the RPS does not state what constitutes outstanding waterbodies and wetlands, and how these relate to the matters of National Importance listed in the RMA and to water conservation orders.</li> </ul>
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	<ul style="list-style-type: none"> <li>• Amend policies relating to soil quality in Objectives 2.1 and 2.2 so that they are more consistent and relate better to one another.</li> <li>• Amend soil quality policies to recognise that there are soil resources in the region that are not of high value, and these do not need to be retained for primary production.</li> <li>• Recognise that soils that are not of high quality may be better used for purposes other than primary production, particularly when use for primary production may result in adverse environmental effects that have the potential to reduce quality of the environment for tourism.</li> <li>• Clarify the difference between high quality soils and highly versatile soils.</li> </ul>	<ul style="list-style-type: none"> <li>• Operative RPS policies have been strengthened in that previously it was only those of high class soils that were to be maintained; now it is all soil resources. Why should soils be retained for primary production if they are not high quality soils, and may in fact be better utilised for other purposes. It is submitted that the policies should be encouraging diversification.</li> <li>• Highly valued soils are to be maintained. This is supported; however highly valued soils are defined in the appendices and differ from versatile soils. Why is the level of protection for high quality soils (in policy 2.1.5) no greater than for all other soils? In 2.2.14-15 it is unclear why areas of high soil quality would receive the same level of protection as outstanding water bodies. One is a matter of national importance, the other is not.</li> <li>• Policy 2.1.15(d) is more permissive than 2.1.5 by recognising that urban expansion into high quality soils may be appropriate (when Policy 2.1.5 for all soils is to retain soil for primary production with no recognition of potential for diversification, and that soils that are not of high quality may be better utilised for tourism or rural residential activity).</li> </ul>
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Amend	Provide clarification as to the purpose of Schedule 4, and how it will be used.	Is the purpose of these criteria to identify all natural features and landscapes, or to determine their value and whether or not they are outstanding, and therefore resources of regional significance?
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	<ul style="list-style-type: none"> <li>• Amend objectives and policies on significant indigenous vegetation and significant habitats of indigenous fauna to better reflect the provisions of the Act, and to ensure that the RPS focuses on those natural and physical resources that are of regional significance.</li> <li>• [Amend] the objectives and policies relating to landscapes so that the level of protection is lessened. Reverting to the provisions as drafted in the operative RPS would be preferred.</li> </ul>	<ul style="list-style-type: none"> <li>• How does Objective 2.2 and policies equate to Objective 2.1 which requires maintenance of other landscapes and resources?</li> <li>• Does this set of policies apply to matters of national importance or is it also protecting regionally significant resources?</li> <li>• How does significance in accordance with Schedule 5 equate to s6(c) of the Act?</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	<ul style="list-style-type: none"> <li>• Amend the policy to better reflect the Act and Policy 5.5.6 of the Operative RPS.</li> <li>• The policy should be written to recognise that protection is not always necessary, and some adverse effects, even when they impact on the values that contribute to significance, may be remedied or mitigated.</li> <li>• If reference to Schedule 3 is included, then the policy should recognise that management of significant effects should be addressed differently to effects that are minor, or that are from an appropriate use or development.</li> </ul>	<ul style="list-style-type: none"> <li>• The policy is stronger than what was in the Operative RPS, and removes reference to inappropriate subdivision, use and development.</li> <li>• 'Protect, enhance and restore' is strong language, and avoidance of adverse effects on the values that contribute to the landscape's significance is strong; it isn't tempered by reference to significance of the adverse effects, or whether the effects are inappropriate.</li> <li>• Reference to significance of effect at Clause c) of the Policy does not appear relevant, given that the policy does not address significant effects, but instead refers to significant values.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	<ul style="list-style-type: none"> <li>• Delete reference to "protection and enhancement" of special amenity landscapes, recognising that their protection is not a matter</li> </ul>	<ul style="list-style-type: none"> <li>• The policy is worded too strongly by stating that it is to 'protect and enhance'.</li> <li>• It is unclear as to why reference to pest species is provided, when</li> </ul>

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				<p>of national importance.</p> <ul style="list-style-type: none"> <li>Recognise that change can occur in these landscapes that may have adverse effects, but that should be considered holistically because on balance they have positive effects.</li> <li>Reorder the policy so the reference to Schedule 3, which assists in determining whether an effect is significant, occurs before those effects are addressed.</li> </ul>	<p>other effects such as infrastructure and vegetation clearance may be more relevant.</p> <ul style="list-style-type: none"> <li>The order of the policy would be better if the reference to Schedule 3, which assists in determining whether an effect is significant, were included before those effects are addressed.</li> </ul>
54	Highly valued natural resources - outstanding water bodies	Policy 2.2.12 - Identifying outstanding water bodies and wetlands	Amend	Amend Policy 2.2.12 to clarify how waterbodies are identified as outstanding, and clarify how this assessment relates to Water Conservation Orders.	<ul style="list-style-type: none"> <li>Policies 2.2.12 and 2.2.13 are to identify and manage outstanding waterbodies and wetlands, through regional plans, based on the broad values listed.</li> <li>Avoidance of 'significant adverse effects on those values that contribute to the outstanding values' is positive in that other effects can be avoided, remedied or mitigated.</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Amend Policy 2.2.13 to clarify how waterbodies are identified as outstanding, and clarify how this assessment relates to Water Conservation Orders.	<ul style="list-style-type: none"> <li>Policies 2.2.12 and 2.2.13 are to identify and manage outstanding waterbodies and wetlands, through regional plans, based on the broad values listed.</li> <li>Avoidance of 'significant adverse effects on those values that contribute to the outstanding values' is positive in that other effects can be avoided, remedied or mitigated.</li> </ul>
68	Objectives on resilience, health and safety	Issue 3.3 - Effects of climate change	Amend	Amend objectives, issue and need statements to reflect comments provided.	Objective 3.3 is supported, however in the Issue and need statement it appears to be limited to resilience against sea level rise. It should also refer to economic resilience in terms of tourism and primary production.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Support	Retain recognition that there is often a functional necessity for the location of an activity where there may be constraints.	Policy 3.1.1 is supported, particularly e) recognises that there is often a functional necessity for the activity to be located where there are constraints.
95	Climate change	Policy 3.3.2 - Adapting to, or mitigating the effects of, climate change	Amend	Retain Policy 3.3.2(c), and improve its wording to reflect the need for economic and environmental resilience.	This policy is supported and should be built upon to reflect the importance of creating environmental and economic resilience.
97	Infrastructure - general	Policy suite 3.4 - Good quality infrastructure and services meet community needs	Amend	<ul style="list-style-type: none"> <li>[Consider] the relationship between the set of policies [in 3.4] and those provided in 3.5.</li> <li>Recognise the importance of managing infrastructure to enable strategic growth and development, and avoid adverse effects on the environment from a lack of future planning and provision of infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 3.4.2 is supported in that it recognises the importance of infrastructure activities that support the health and safety of the community, and social and economic activities, and improve efficiency of use of natural resources.</li> <li>The protection of infrastructure corridors for infrastructure needs is supported.</li> <li>If the function of a regional council is to manage regional effects, why is there a separate set of objectives and policies for infrastructure, and regional and national infrastructure?</li> <li>Policy reflects the need to continue to manage infrastructure so that it meets the existing and future needs of the community.</li> <li>Queenstown's infrastructure needs to be managed strategically to ensure that it copes with anticipated tourist and residential growth, and to ensure that lack of management or provision does not result in a reduction in the quality of life, or have a negative impact on tourism.</li> </ul>
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	<ul style="list-style-type: none"> <li>Amend Policy 3.4.1 to better clarify its purpose and relationship to the functions of a regional council.</li> <li>Consider the relationship between 3.4.1(a) and Objective 3.5 and associated policies.</li> </ul>	<ul style="list-style-type: none"> <li>Policy is important to recognise the functional needs of regional infrastructure, and to design infrastructure to take into account future land use change.</li> <li>Item (a) relates to the functional needs of regional infrastructure. It is unclear as to how this relates to Policy 3.5.3, which is the protection of infrastructure of regional or national significance.</li> <li>Item (c) recognises the importance of managing urban growth within areas that have sufficient infrastructure. Question whether this could be strengthened - what does this mean for areas where there is no</li> </ul>

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					infrastructure - is the urban growth in those areas not managed? <ul style="list-style-type: none"> <li>Item (d) refers to structural design and release of land for new urban development. Does this mean structural design of new urban development? It is unclear what this means from a regional council perspective?</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Support	Amend objectives, issue and need statements to reflect comments provided.	Recognition of the importance of regional and national infrastructure, and that it may result in local adverse effects is supported.
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	<ul style="list-style-type: none"> <li>Amend Policy 3.5.1 to recognise that tourism infrastructure should be included as regionally significant infrastructure.</li> <li>Recognise that within Queenstown future infrastructure that is of regional significance may include lake and river transport and transport by gondola and specifically recognise the necessary infrastructure, including jetties and gondola lines.</li> </ul>	<ul style="list-style-type: none"> <li>The definition of infrastructure does not include reference to wharves/jetties for transportation by lake. It includes transportation on land by any means including road, cycleway, walkway, and facilities for loading and unloading passengers from the sea. Neither does it provide for transport by gondola, either as an alternative to use of mountain roads to ski fields or as commuter option.</li> <li>In Queenstown future transport infrastructure will include lake and river transport and is likely to include gondola operations. These should be recognised as they will become regionally significant.</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	<ul style="list-style-type: none"> <li>That the importance of regional infrastructure should be balanced with the need to reduce effects of infrastructure provision.</li> <li>Clarify how [Policy 3.5.3] relates to policies to protect outstanding landscapes, which are also to be protected.</li> </ul>	<ul style="list-style-type: none"> <li>Regional infrastructure includes all power lines. There needs to be clear direction that all new power lines should be underground. This meets the objective of reducing environmental impact, and also the ability to provide continuous electricity supply.</li> <li>Should nationally and regionally significant infrastructure be recognised and protected, but also designed to take into account the matters listed in Policy 3.4.1 (b) may also apply to all infrastructure.</li> <li>The effects of the infrastructure and its design, whether or not of regional significance, should be considered.</li> </ul>
107	Objectives on resilience, health and safety	Objective 3.6 - Energy supplies to Otago's communities are secure and sustainable	Support	Amend objectives, issue and need statements to reflect comments provided.	Submitter supports Objective 3.6's recognition that we need to reduce our dependency on fossil fuels.
108	Energy	Policy suite 3.6 - Energy supplies to Otago's communities are secure and sustainable	Amend	<ul style="list-style-type: none"> <li>Amend the policies to include encouraging efficient end use of energy to reduce the need for more energy generation.</li> <li>Support secure and sustainable energy supplies, but consider linking to urban growth and infrastructure provisions to better achieve integrated management. Amend policies to provide linkage between energy supply, efficient use, and urban development.</li> </ul>	<ul style="list-style-type: none"> <li>Submitter supports use and protection of renewable energy sources, and the reduction in fossil fuels, but policies should also encourage efficient end use of energy to reduce the need for more energy generation.</li> <li>This links to the policies relating to urban growth and infrastructure, and the need to enable and encourage development in locations that can be efficiently serviced, and where energy needs are reduced for transport, heating etc.</li> <li>While the introductory statement refers to the ability to sustain economic growth, and efficient use of energy, this is not reflected in the policies.</li> <li>Policies could be more specific, for example, by ensuring that all new subdivision and development provide underground electricity lines to reduce effects on the environment.</li> <li>Policies could be more balanced; focus less on protection of infrastructure and provide for avoiding, remedying or mitigating adverse effects on that infrastructure. Unsure how this policy marries up with policies for managing landscape values.</li> <li>Policy 3.6.6 is supported as it supports proposed zone development which would support development of infrastructure such as a gondola, which is a means of reducing longterm demand for fossil fuels.</li> </ul>
115	Objectives on resilience, health and safety	Objective 3.7 - Urban areas are well designed, sustainable and reflect local character	Amend	Amend objectives, issue and need statements to reflect comments provided.	<ul style="list-style-type: none"> <li>Objective 3.7 is unclear; in the issue statement it refers to mobility needs of people. Is this disabled people or is it referring to the need to provide live-work environments that reduce reliance on private motor vehicles? The objective does not reflect the associated issue and need statement and could be improved to reflect the need to attract</li> </ul>

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					business investment and future-proofing of infrastructure. <ul style="list-style-type: none"> <li>• There seems to be little difference between objective 3.7 and 3.8; it seems that both are aiming for urban growth that is effectively and efficiently serviced, in locations that reduce reliance on private motor vehicles.</li> </ul>
116	Urban design	Policy suite 3.7 - Urban areas are well designed, sustainable and reflect local character	Amend	<ul style="list-style-type: none"> <li>• Amend Objective 3.7 and associated policies to ensure that they are focused on the functions of a regional council, and do not impose detailed policy statements that are better managed at the district council level.</li> <li>• Provision for a safe, healthy and resilient community is supported, but the level of detail within the Policy should be reconsidered.</li> <li>• Delete 'protection of areas of indigenous biodiversity and habitats of indigenous fauna', or amend to recognise that it is only those areas of significance that should be managed carefully, and a balanced approach should be taken that recognises that in some instances there is greater environmental benefit achieved when such areas are not protected.</li> </ul>	<ul style="list-style-type: none"> <li>• The introductory statement is supported in that it identifies that poor quality or badly coordinated development presents risks socially, environmentally and economically.</li> <li>• The level of detail in the policy is concerning, and reference to protection of areas of indigenous biodiversity and habitats should be removed.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Support	Retain policies that encourage district councils to plan strategically for growth, and the infrastructure implications for such growth.	The clauses of the policy encouraging efficiency are supported, e.g. (b) — coordinated and efficient and effective infrastructure is important, and providing sufficient land for future development is supported.
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Remove the use of 'avoid' from Policy 3.8.3 so that it is clear that some development, even if it undermines primary production, has greater environmental and economic benefits to the region than the continued use of rural land for primary production, particularly when such primary production is marginal from both an economic and environmental perspective.	<ul style="list-style-type: none"> <li>• This policy is not supported given the importance of tourism to the region. For example, where soil quality is not high, development should not be avoided if it is a more sustainable use of natural and physical resources.</li> <li>• The policy is stronger for all soils (for primary production) than for highly versatile soils, in that (a) is to avoid development, and (b) is to have particular regard to whether the proposal will result in loss of productive potential of highly versatile soil.</li> <li>• Re item (c) some unplanned development may be of benefit and should not foreclose opportunities simply because they haven't been included within a long term plan.</li> <li>• Item (d) should be qualified because in some cases competing demand for resources is not problematic; it is when the resources are scarce. In some cases, the new urban development may be a better use of productive land and this needs to be taken into account.</li> </ul>
129	Hazardous substances and waste	Policy suite 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Provide clarification as to how these provisions relate to the NES for Contaminated Soils to Protect Human Health.	<ul style="list-style-type: none"> <li>• It is unclear how these policies relate to the NES for contaminated soils.</li> <li>• Is 'potentially contaminated' the same as HAIL? Does this mean that we have to consider these policies when we trigger consent under the HAIL?</li> </ul>
141	Objectives on use and enjoyment of natural and built environment	Issue 4.4 -Efficient use and finite resources	Amend	Amend the objective and its associated issues statements to better relate to one another, and to recognise the importance of maintaining and enhancing the wellbeing and prosperity of Otago's communities.	The issue does not seem to relate to the objective; the objective is to enable the use of resources while the issue identifies the finite nature of resources. The issue would be better as a positive statement that use of natural and physical resources is important for the wellbeing and prosperity of Otago's communities.
145	Public access to areas of values	Policy suite 4.1 - Public access to areas of value to the community is maintained or enhanced	Amend	<ul style="list-style-type: none"> <li>• Retain objective and policy that supports provision of public access.</li> <li>• This should be extended to provide for its relationship to policies for landscape and natural features. It should be clear that there is</li> </ul>	Maintenance and enhancement of public access are important.

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				a balance between protection of values and benefits of providing public access.	
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	<ul style="list-style-type: none"> <li>Amend Policy 4.3.1 to recognise the importance of tourism and recreation activities within the rural area, and that farming activities need to be managed to ensure that the quality of the environment is maintained.</li> <li>It needs to be recognised that there may be greater benefit from enabling recreation and other uses that support tourism, and have the potential to improve the quality of the environment.</li> </ul>	<ul style="list-style-type: none"> <li>This policy supports farming activities over and above other uses. It is at odds with the recognition of the importance of tourism, and should be amended to recognise that farming should be enabled in those areas of highly versatile soil, and where adverse effects of primary production can be adequately managed.</li> <li>Minimising subdivision into rural residential lots is not supported. Subdivision into smaller lots can result in greater benefit both to the environment and economically.</li> <li>Policy should recognise that primary production is important in some areas, but that this needs to be balanced with the fact that it can result in reduction in environmental quality and in areas where soil quality is low, diversification into other uses may be more beneficial, and may better represent sustainable management.</li> <li>Item (e) is supported in that it provides for tourism and recreational activities, however, this should support all tourism and recreational activities, not only those that are of a scale that support rural activities.</li> </ul>
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	Recognise that within Queenstown there is more than one CBD, and that Remarkables Park is zoned to become a town centre/Central Business District in its own right.	<ul style="list-style-type: none"> <li>Support Policy 3.4.3 (sic).</li> <li>Remarkables Park is an integrated development, and represents efficient use of infrastructure, employment and services. This needs to be recognised and provided for.</li> <li>It is not clear what is a 'larger urban area'. Remarkables Park is already a large urban area and is zoned to become larger.</li> <li>The policy should refer to 'central business districts' given that there is more than one CBD in Queenstown. There is more than one town centre.</li> </ul>
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Oppose	Delete Policy 4.3.5.	<ul style="list-style-type: none"> <li>Within Queenstown this policy has been given effect through Plan Change 19, which recognises the importance of managing land to provide suitable land area for industrial activities.</li> <li>Providing Policy 4.3.5 within the Regional Policy Statement is outside the function of the regional council; zoning adequate land for industrial uses is a district council function, and once that land is zoned, it is the role of the district council to manage land uses.</li> </ul>
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	<ul style="list-style-type: none"> <li>Amend Policy 4.3.6 to recognise the importance of gravel extraction from those locations where good gravels can be sourced.</li> <li>Recognise that effects can be remediated or mitigated, and in these cases preference to avoidance is not necessary.</li> <li>Amend policies 4.3.6 and 4.5.6 to remove repetition and provide clearer direction. Ensure that the amended policy recognises the importance of gravel extraction, and the ability to remedy and mitigate adverse effects.</li> </ul>	<ul style="list-style-type: none"> <li>It is important to locate gravel extraction/mining activities where the required gravels are situated.</li> <li>Recognise that in many cases preference cannot be given to avoiding outstanding natural landscapes. Most gravel extraction in the Queenstown area currently takes place in an Outstanding Natural Landscape (the Shotover River). Reference should be made to the ability to mitigate and remedy adverse effects, and when remediation is possible, preference to avoidance in those locations listed may not be necessary.</li> <li>This policy appears to be repeated by Policy 4.5.6, and it is not clear why the policies are provided separately.</li> </ul>
165	Making the most of available resources	Policy 4.4.3 - Encouraging environmental enhancement	Amend	Retain this policy, but recognise that it should be integrated with policies for relating to protection of natural and physical resources, so that environmental and economic benefits of a development are considered when determining whether it is appropriate.	Policy is supported but should be linked to other policies such as managing for rural uses; and managing landscape values and features so that offsets can be recognised and provided for. For instance, if an activity enhances public access and protects and restores habitat, these benefits should be taken into account when determining whether a development proposal that adversely affects landscape values is appropriate.
167	Management of adverse effects	Policy suite 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are	Amend	That the provision for offsets is retained, and expanded to recognise that offsets can be applied to other resources	<ul style="list-style-type: none"> <li>Policies 4.5.7 and 4.5.8 provide for offsetting for indigenous biodiversity. Unsure why offsetting is applied only to biodiversity and air quality and not to offsetting effects on landscape or heritage</li> </ul>

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		minimised		<ul style="list-style-type: none"> <li>Assessment of proposals for use and development need to be considered in a balanced way, recognising that some adverse effects can be offset by positive effects.</li> <li>Amend the objectives and policies that reference 'protection' and 'avoidance' to recognise the ability to provide positive offsets</li> </ul>	<p>values.</p> <ul style="list-style-type: none"> <li>Instead of separate policies relating to offsets, it would be better to encapsulate this within the policies specific to indigenous vegetation, landscape values and air quality. This would better reflect that some activities may cause adverse effects, but the offset offered could result in a net benefit. This net benefit can make an activity appropriate, even if it has significant effects on one element of national importance.</li> <li>It is important that effects on each value is balanced, and decisions are made on a balanced consideration of all effects and all values.</li> </ul>
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Support	Support Policy 4.5.1 and recognise its linkage to provision of infrastructure by district councils to provide for growth, and avoid adverse effects from objectionable discharges.	District councils should manage infrastructure to ensure that objectionable odour and discharges are avoided, which is important for tourism growth and development.
170	Management of adverse effects	Policy 4.5.3 - Applying emission standards on domestic fuel burners	Support	That the submission is noted.	Important to provide secure energy supply. Maintaining air quality in Queenstown is supported.
171	Management of adverse effects	Policy 4.5.4 - Minimising soil erosion	Amend	Amend policy and associated methods so that they provide for regionally significant matters and provide greater clarity.	<ul style="list-style-type: none"> <li>Unsure whether this relates to earthworks, and whether it should be related to the management of waterbodies.</li> <li>It is noted that Method 4.1.3 states that district plans will implement Policy 4.5.1 by including provisions to manage discharge of dust. This could be improved by recognising the importance of other forms of discharge resulting from soil erosion.</li> </ul>
172	Management of adverse effects	Policy 4.5.5 - Controlling the introduction and spread of pest plants and animals	Amend	<ul style="list-style-type: none"> <li>Review provisions for pest management, and ensure that methods relate correctly to policies.</li> <li>Ensure that the provisions are within the functions of regional councils for the purposes of the Regional Policy Statement, and that the policies and methods do not impose requirements on district councils that are outside scope.</li> </ul>	<ul style="list-style-type: none"> <li>The management of pest species is supported, but reference to district plans as a method is queried.</li> <li>Policy refers to Method 4 City and District Plans, but Method 4 does not include any reference to this policy. Is this a matter for regional policy statement or for pest management strategies?</li> </ul>
178	Methods	Methods - general	Amend	<ul style="list-style-type: none"> <li>Address concerns regarding method statements</li> <li>Ensure that each method relates to the relevant policy, is workable and relates to the role and function of the district council.</li> </ul>	<ul style="list-style-type: none"> <li>Method 4.2.4 states that district councils will implement various policies by preparing structure plans for large scale land use changes, but it is uncertain what is meant by structure plans, and how this is to be achieved.</li> <li>Method 4.2.7 states that district councils may implement Policies 1.2.4 and 4.1.1 by including conditions to maintain and enhance access to the natural environment or sites of cultural significance. Consider a policy to recognise importance of public access, and the ability to provide it as a benefit to offset adverse effects on other values. For example, a policy could recognise that development may cause some adverse effects, but the provision of public access to recreational or natural features can offset those effects.</li> </ul>
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Clarify the purpose of Method 4.1.5.	Method 4.1.5 seems outside the functions of a regional council by imposing infrastructure design standards to ensure access for mobility impaired.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Amend Method 4.1.2 to better direct district councils to manage growth strategically, and clarify that it is not only relating to imposing conditions for the purposes of reducing air discharges.	This method is very directive, it is suggested it should be clarified so that it relates to Policy 3.8.1(f) only.
253	Other comments	Structure of the document & useability - general	Amend	<ul style="list-style-type: none"> <li>Consideration to whether the layout could be improved to reduce repetition, and increase recognition of the integration between the different objectives and policies.</li> </ul>	<ul style="list-style-type: none"> <li>Amendment to layout, and the objectives and policies is needed in order to better achieve the purpose of the RPS, as stated in Section 59 of the Act.</li> <li>The RPS is cumbersome and it is difficult to understand the linkage</li> </ul>



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				<ul style="list-style-type: none"> <li>Remove repetition and confusion as to what value of resources is being addressed.</li> </ul>	<p>between issue, objective, policy and method.</p> <ul style="list-style-type: none"> <li>The explanation with each objective is often poorly reflected in the policy provisions. At times the policy statement differs in intent or strength from the detailed policy provisions.</li> <li>The objectives and policies are written as distinct provisions, with little integration. This is particularly problematic given the purpose of the RPS is the integrated management of natural and physical resources.</li> </ul>
270	Objectives on high quality natural resources	Introduction to Objective 2.2	Amend	<ul style="list-style-type: none"> <li>That the objectives are amended to better reflect the wording of the Act, so that it is clear that it is those landscapes and values that are of national importance that should be protected from inappropriate subdivision, use and development.</li> <li>Allowance needs to be made for subdivision, use and development that is appropriate, and landscapes and natural features do not necessarily need to be protected from such uses.</li> </ul>	<ul style="list-style-type: none"> <li>The explanation to Objective 2.2 states that it is a matter of national importance to recognise and provide for these matters, however, this is at odds with the RMA s6.</li> </ul>
276	Objectives on resilience, health and safety	Need 3.4	Amend	Amend objectives, issue and need statements to reflect comments provided.	<ul style="list-style-type: none"> <li>In Objective 3.4 the 'need' statement should include reference to the need for strategic planning and management of infrastructure to meet community, business and environmental needs now and into the future. Management of infrastructure needs to take a long term approach and recognise future growth in both residents and tourists.</li> <li>Recognise that management of infrastructure needs to take a long term view, and recognise future growth in both residents and tourists.</li> </ul>
301	Objectives on use and enjoyment of natural and built environment	Introduction to Objective 4.5	Amend	<ul style="list-style-type: none"> <li>Amend the error, whereby objective 4.5 refers to "section 2.3 integrated management".</li> <li>In making this correction, ensure that the amendment recognises that not all of the values identified in Section 2.2 are significant and not all effects should be avoided.</li> </ul>	<ul style="list-style-type: none"> <li>The introductory statement to Objective 4.5 refers to "section 2.3 integrated management". However, it is unclear whether the reference should be to Section 2.2 or to Section 2.3.</li> <li>If the statement should refer Section 2.2, then it should be corrected to recognise that not all of the resources identified in Section 2.2 are so significant that adverse effects should be avoided. For instance, they refer to special amenity landscapes, which are not valued as highly as outstanding natural landscapes. It should also be recognised that not all effects need to be avoided.</li> </ul>
301	Objectives on use and enjoyment of natural and built environment	Introduction to Objective 4.5	Amend	<ul style="list-style-type: none"> <li>Support the statement under Objective 4.5 that activities such as mineral extraction and infrastructure may have to locate in areas containing significant values.</li> <li>This should be amended to recognise that there are other activities that have to locate in areas containing significant values, and they can be supported where their effects can be managed appropriately.</li> </ul>	<ul style="list-style-type: none"> <li>Statement is supported but should not be limited to mineral extraction and infrastructure development, but reflect the range of activities important to future resilience and sustainable management of the Otago region may need to locate in areas containing significant values.</li> <li>The effect on these values can be managed and in some cases there can be greater environmental benefit.</li> <li>The policies of the RPS need to be broad enough to cater for future activities, not those that are appropriate in 2015.</li> <li>The final paragraph under this Objective refers to community values. This could link back to the importance of the environment for both existing and future communities, and also economic resilience and tourism.</li> </ul>

### 148 Little Valley Station Ltd

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Remove clause 2.1.6 d).	<ul style="list-style-type: none"> <li>We oppose 2.1.6 d) as current research on tussock grasslands as a water harvesting and water quality tool is contradictory. Current research does not support this theory strongly enough to justify tussock grasslands being included in a regional wide plan in this way.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					<ul style="list-style-type: none"> <li>Current research into the part tussock grasslands plays in water harvesting and freshwater quality is not conclusive and therefore cannot be supported.</li> </ul>
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Amend	Remove clause 4.3.2 b).	<ul style="list-style-type: none"> <li>We oppose 4.3.2 b) as current research on tussock grasslands as a water harvesting and water quality tool is contradictory. Current research does not support this theory strongly enough to justify tussock grasslands being included in a regional wide plan in this way.</li> <li>Current research into the part tussock grasslands plays in water harvesting and freshwater quality is not conclusive and therefore cannot be supported.</li> </ul>
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Remove clause 6.1.3 b).	<ul style="list-style-type: none"> <li>We oppose 6.1.3 b) as current research on tussock grasslands as a water harvesting and water quality tool is contradictory. Current research does not support this theory strongly enough to justify tussock grasslands being included in a regional wide plan in this way.</li> <li>Current research into the part tussock grasslands plays in water harvesting and freshwater quality is not conclusive and therefore cannot be supported.</li> </ul>
199	Method 6 - Research, Monitoring and Reporting	Method 6.2 - Research	Amend	Amend Clause 6.2.2(a)(ii) by removing the words "...such as tussock grasslands."	<ul style="list-style-type: none"> <li>We support Clause 6.2.2 (a) which states that Councils will research and share information relevant to the effects of land use.</li> <li>This Clause refers to researching a wide variety of vegetation and cover, but singles out tussock grassland from all other vegetation and implies that the research on this vegetation is already complete and conclusive.</li> <li>Current research into the part tussock grasslands plays in water harvesting and freshwater quality is not conclusive and therefore cannot be supported.</li> </ul>

#### 149 Angus Robertson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Amend	Amend Objective 2 and related policies to include protection of all surf breaks on the Otago Coastline.	<ul style="list-style-type: none"> <li>To ensure all of Otago's surf breaks are there for our community and future generations.</li> <li>The Otago coastline is home to numerous quality surf breaks.</li> <li>Otago's surf breaks bring people from across the city, the country and the world, brings injections to our economy and diversity to our community.</li> <li>Surf breaks are a finite resource, and a source of recreation to approximately 7% of NZ's population.</li> <li>Safe and public access to surf breaks must be maintained.</li> </ul>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Amend Objective 2 and related policies to include protection of all surf breaks on the Otago Coastline.	<ul style="list-style-type: none"> <li>To ensure all of Otago's surf breaks are there for our community and future generations.</li> <li>The Otago coastline is home to numerous quality surf breaks.</li> <li>Otago's surf breaks bring people from across the city, the country and the world, brings injections to our economy and diversity to our community.</li> <li>Surf breaks are a finite resource, and a source of recreation to approximately 7% of NZ's population.</li> <li>Safe and public access to surf breaks must be maintained.</li> </ul>
52	Highly valued natural resources - the coastal environment	Policy 2.2.10 - Identifying surf breaks of national importance	Amend	<ul style="list-style-type: none"> <li>Should refer to both surf breaks of national significance AND "regional significance". Or blanket protection given to all breaks in Otago.</li> <li>Refer to submission for list of surf breaks which should be included in a list acknowledging their regional significance and recreational value.</li> </ul>	<ul style="list-style-type: none"> <li>To ensure all of Otago's surf breaks are there for our community and future generations.</li> <li>The Otago coastline is home to numerous quality surf breaks.</li> <li>Otago's surf breaks bring people from across the city, the country and the world, brings injections to our economy and diversity to our community.</li> <li>Surf breaks are a finite resource, and a source of recreation to approximately 7% of NZ's population.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
53	Highly valued natural resources - the coastal environment	Policy 2.2.11 - Managing surf breaks of national importance	Amend	Should refer to both surf breaks of national significance AND "regional significance". Or blanket protection given to all breaks in Otago.	<ul style="list-style-type: none"> <li>• Safe and public access to surf breaks must be maintained.</li> <li>• To ensure all of Otago's surf breaks are there for our community and future generations.</li> <li>• The Otago coastline is home to numerous quality surf breaks.</li> <li>• Otago's surf breaks bring people from across the city, the country and the world, brings injections to our economy and diversity to our community.</li> <li>• Surf breaks are a finite resource, and a source of recreation to approximately 7% of NZ's population.</li> <li>• Safe and public access to surf breaks must be maintained.</li> </ul>
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Amend	Outcome 4 should have a policy included to manage all surf breaks in Otago and give recognition to all surf breaks on Otago's coastline. The policy should ensure other resource use, both land and ocean based, does not adversely affect surfbreaks.	<ul style="list-style-type: none"> <li>• Recognition should be afforded to not only the natural beauty and biodiversity of our coastline, but surf breaks along the coast also which are a natural resource used daily by the local community and world travellers.</li> <li>• Otago's surf breaks can often be put under pressure from the direct effects of human activities, impacting this valued recreation and tourism activity (see submission for examples).</li> </ul>

### 150 Landpro Limited

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
7	Chapter B1 - Kai Tahu values	Chapter B1 - general requests	Support	<ul style="list-style-type: none"> <li>• Supports objectives, policies and methods which ensure resource management decisions take Kai Tahu values into account whilst providing flexibility on the circumstances within which Kai Tahu will be engaged for more general resource management processes.</li> <li>• Supports policies and methods which avoid procedural duplication, delays and increases in costs where resource management decisions are required from a local authority.</li> </ul>	<ul style="list-style-type: none"> <li>• Objectives, policies and methods ensure resource management decisions take Kai Tahu values into account whilst providing flexibility on the circumstances within which Kai Tahu will be engaged for more general resource management processes.</li> <li>• Policies and methods avoid procedural duplication, delays and increases in costs.</li> </ul>
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Support	<ul style="list-style-type: none"> <li>• Support objectives, policies and methods which identify a commonality when using or classifying those matters as outlined in Sections 6 and 7 of the RMA and that these will be applied consistently throughout the Otago region.</li> </ul>	<ul style="list-style-type: none"> <li>• Identified objectives, policies and methods provide certainty to persons seeking to use and develop resources.</li> <li>• Neither support nor oppose the objectives and policies seeking to establish an integrated management framework between local and territorial authority regulatory jurisdictions.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Support	Support the identification that indigenous species may have more optimum survival rates under a flow regime which may be detrimental to other fish species that predate on those indigenous species	This has been a matter of conflict in the past.
65	Chapter B3 - Resilience, health and safety	Chapter B3 - general requests	Did not specify	<ul style="list-style-type: none"> <li>• Supports objectives, policies and methods which seek to have a positive impact on people's health and safety and social and economic wellbeing.</li> <li>• Remains neutral as to whether the proposed objectives, policies and methods surrounding nationally and regionally significant infrastructure and projects is suitable in this particular context/ chapter.</li> <li>• Opposes a strong regulatory approach to the use of land in order to pre-empt a potential hazard effect.</li> </ul>	No reason given.
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Did not specify	Support objectives, policies and methods which enable the use and development of resources	

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				whilst avoiding, remedying or mitigating adverse effects.	
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Oppose	Oppose	<ul style="list-style-type: none"> <li>• Questions whether any catchment can be considered to be 'dry' and therefore require the level of regulatory approach adopted through Policy 4.3.2</li> <li>• There seems to be a disconnect or lack of hierarchy between Policy 4.3.2 and Policies 4.3.1(a) and 4.4.1(d).</li> <li>• Accept that, by comparison, some catchments can be drier (in terms of rainfall) than others but the minimisation strategy proposed is far too specific and does not account for developments which make the most efficient use of the resource available.</li> </ul>
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Did not specify	Support 4.4.1(c) and (d), but opposes the stringent language utilised in (a) and (b) of this policy.	The Section 32 report acknowledges that a strong regulatory presence is intended, however, the costs and benefits analysis table identifies significant barriers to users trying to achieve this regulatory response.
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Did not specify	Decision-makers should carefully consider the language and/or inclusion of Method 1.1.3	<ul style="list-style-type: none"> <li>• Supports objectives, policies and methods which ensure resource management decisions take Kai Tahu values into account whilst providing flexibility on the circumstances within which Kai Tahu will be engaged for more general resource management processes.</li> <li>• Supports policies and methods which avoid procedural duplication, delays and increases in costs where resource management decisions are required from a local authority.</li> </ul>
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Support	The terms 'efficient and effective' should remain in place within Method 1.4.1 or this Method should contain wording of this nature.	<ul style="list-style-type: none"> <li>• Supports objectives, policies and methods which ensure resource management decisions take Kai Tahu values into account whilst providing flexibility on the circumstances within which Kai Tahu will be engaged for more general resource management processes.</li> <li>• Supports policies and methods which avoid procedural duplication, delays and increases in costs where resource management decisions are required from a local authority.</li> </ul>
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Did not specify	Decision-makers should carefully consider the language and/or inclusion of Method 2.2.4	<ul style="list-style-type: none"> <li>• Supports objectives, policies and methods which ensure resource management decisions take Kai Tahu values into account whilst providing flexibility on the circumstances within which Kai Tahu will be engaged for more general resource management processes.</li> <li>• Supports policies and methods which avoid procedural duplication, delays and increases in costs where resource management decisions are required from a local authority.</li> </ul>
186	Method 2 - Regional, City and District Council Relationships	Method 2.2 - Establishing processes to address cross-boundary issues	Support	The terms 'efficient and effective' should remain in place within Method 2.2.3(b) or this Method should contain wording of this nature.	<ul style="list-style-type: none"> <li>• Supports objectives, policies and methods which ensure resource management decisions take Kai Tahu values into account whilst providing flexibility on the circumstances within which Kai Tahu will be engaged for more general resource management processes.</li> <li>• Supports policies and methods which avoid procedural duplication, delays and increases in costs where resource management decisions are required from a local authority.</li> </ul>
187	Method 2 - Regional, City and District Council Relationships	Method 2.3 - Regional rule for extinguishing existing use rights	Did not specify	• Submit neutrally on this matter.	Question whether Method 2.3.1 is legal.
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Did not specify	Decision-makers should carefully consider the language and/or inclusion of Method 3.1.1	<ul style="list-style-type: none"> <li>• Supports objectives, policies and methods which ensure resource management decisions take Kai Tahu values into account whilst providing flexibility on the circumstances within which Kai Tahu will be engaged for more general resource management processes.</li> <li>• Supports policies and methods which avoid procedural duplication, delays and increases in costs where resource management decisions are required from a local authority.</li> </ul>
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Did not specify	Decision-makers should carefully consider the language and/or inclusion of Method 4.1.9	<ul style="list-style-type: none"> <li>• Supports objectives, policies and methods which ensure resource management decisions take Kai Tahu values into account whilst providing flexibility on the circumstances within which Kai Tahu will be</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					engaged for more general resource management processes. <ul style="list-style-type: none"> <li>• Supports policies and methods which avoid procedural duplication, delays and increases in costs where resource management decisions are required from a local authority.</li> </ul>
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Did not specify	Submit neutrally on this matter.	Question whether Method 4.2.6(b) is legal.
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Amend	Amend	Method 6.1.3(b) seems to conflict with policies which seek to enable communities to use infrastructure to gain efficiencies.
200	Method 6 - Research, Monitoring and Reporting	Method 6.3 - State of Environment Reporting	Amend	Amend Method 6.3.1 as follows: "Regional, city and district councils will carry out state of the environment <u>monitoring</u> , reporting, <u>evaluation and analyses</u> ."	<ul style="list-style-type: none"> <li>• The Method would be deficient without the parameters suggested.</li> <li>• Suggested amendment is consistent with the language used in the AER section around state of the environment monitoring.</li> </ul>
202	Method 6 - Research, Monitoring and Reporting	Method 6.5 - Plan implementation reporting	Oppose	Oppose	<ul style="list-style-type: none"> <li>• There is no need for Method 6.5.</li> <li>• There is no basis as to why only achievements would be or ought to be the only criteria to be reported.</li> </ul>
226	Anticipated Environmental Results	Anticipated Environmental Results - General	Amend	With regard to AER's 2.1-2.7, the measurement indicator should include monitoring, but also reporting, review and audit.	Without these in place, there is no capability to measure because there is no frame of reference to state whether the measurement has achieved the indicator result.
227	Anticipated Environmental Results	AER 1.1 - Te Tiriti o Waitangi principles are adhered to in Otago	Amend	Amend	Both the indicator and the measurement are not appropriate parameters.
228	Anticipated Environmental Results	AER 1.2 - Kai Tahu values and culture are respected and able to be expressed	Amend	<ul style="list-style-type: none"> <li>• Suggest a survey of Kai Tahu satisfaction as a measurement for the indicator "Kai Tahu place names are used in official documents and correspondence"</li> <li>• Provide guidance around what a cultural health indicator is prior to using it as a term in Proposed RPS.</li> <li>• Provide clarification on what the intention is of the indicator "Planning processes permit Kai Tahu to develop their ancestral lands in keeping with their tikaka" and measurement "Consenting records and Kai Tahu satisfaction with planning processes."</li> </ul>	<ul style="list-style-type: none"> <li>• The indicator seems to suggest that development by Kai Tahu could be more permissive as opposed to development by the general public.</li> <li>• Disagrees with a measurement which requires one entity to decide if a statutory process is satisfactory.</li> </ul>
236	Anticipated Environmental Results	AER 3.1 - The location and design of new developments and uses reduce community exposure to the adverse effects of shock events and processes.	Amend	Amend	<ul style="list-style-type: none"> <li>• Submitter believes there is conflict between AER 3.1 and 3.2.</li> <li>• On one hand, a measurement of indicator achievement is that records show no new dwellings were granted in areas of significant natural hazard risk and yet a later measurement suggests evaluation reports show new developments and uses can withstand effects of natural hazards and climate change.</li> <li>• Resilience includes the capability of human invention to engineer and develop around environmental constraint and should not be stifled by the implied measurement.</li> </ul>
237	Anticipated Environmental Results	AER 3.2 - The impact on life, property, lifeline utilities, and essential services from climate change is reduced in Otago	Amend	Amend	<ul style="list-style-type: none"> <li>• On one hand, a measurement of indicator achievement is that records show no new dwellings were granted in areas of significant natural hazard risk and yet a later measurement suggests evaluation reports show new developments and uses can withstand effects of natural hazards and climate change.</li> <li>• Resilience includes the capability of human invention to engineer and develop around environmental constraint and should not be stifled by the implied measurement.</li> </ul>
240	Anticipated Environmental Results	AER 3.5 - The use of local renewable energy sources in Otago increases and reliance on fossil fuels decreases	Amend	Amend	<ul style="list-style-type: none"> <li>• Decreasing the usage of 'gas fires' as a means of achieving AER 3.5 is in direct conflict with air quality aspirations in Chapters 2 and 4 of the PRPS.</li> <li>• AER 3.5 indicator seems to have little to no bearing on the matters</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					as itemised under Policy 3.6.6. • Seeks for decision-makers to carefully consider implications of AER 3.5.
243	Anticipated Environmental Results	AER 4.1 - Otago's coast, lakes and rivers can be accessed by the public	Amend	<ul style="list-style-type: none"> <li>Remove the reference to guest nights in the measurement "Guest night records in areas of high value, complaints record."</li> <li>Include reference to survey title plans in the indicator "The number and extent of esplanades and similar areas providing access to Otago's water bodies and coastal environment maintained or enhance" and measurement "Remote sensing and in-situ measurements of access strips, esplanades strips and areas in Otago."</li> </ul>	The reference to guest nights is considered irrelevant.

### 151 Straterra

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	<ul style="list-style-type: none"> <li>Deletion of the word "protect" where it occurs and replaced with "maintain".</li> <li>The addition of remedy or mitigate wherever sole reference is made to avoiding adverse effects.</li> <li>Replace "minimise" with "avoid, remedy or mitigate".</li> </ul>	<ul style="list-style-type: none"> <li>Seek more workable and fit-for-purpose document by providing for the appropriate consideration of proposals for economic development, in particular, minerals prospecting, exploration and mining and quarrying, and to avoid unnecessarily stymying economic development, or delivering economically inefficient outcomes for Otago.</li> <li>The identification places or sites of importance for one value or another (e.g. RMA s6 or s7) does not mean that total protection of, or the prevention of development in, such places via a stipulation to avoid all adverse effects, is always the appropriate management outcome.</li> <li>The term "minimise" is unhelpful because it is imprecise. Does it mean minimise to zero? Or to some other arbitrary level?</li> </ul>
4	Overall approach	Introduction - RPS framework	Amend	Support [the "Otago has high quality natural resources and ecosystems" section (p. 11)] subject to amendment [to second paragraph, second sentence]: "Agriculture and tourism, Otago's biggest earners, both rely on having a great environment, <u>while mining earns high wealth from a small footprint. The chapter...</u> "	<ul style="list-style-type: none"> <li>Otago's resources include minerals.</li> <li>Mineral exploration and mining, and the use of mined and quarried minerals, are significant economic activities in Otago, are connected to the regional economy, and deserve specific mention.</li> </ul>
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Support subject to following amendments: "...j) <u>Provide for the pProtection, use and development</u> of Kai Tahu values; and ... l) <u>Provide for the protection, use and development of Protect</u> important recreation values; and ... n) <u>Avoid, remedy or mitigate</u> the adverse effects of pest species, prevent their introduction and reduce their spread; and..."	<ul style="list-style-type: none"> <li>Policy 2.1.1(h) would spell the end of any new hydro-electricity development in Otago, as would, potentially Policy 2.2.1(p).</li> <li>Should be cautious about calling for protection without any consideration of a proposal.</li> <li>Policy 2.1.1 (n) risks being impossible to implement. In general, the use of the word "avoid", especially post-King Salmon, is the same as saying "prohibited".</li> </ul>
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Support subject to following amendments: "... a) <u>ProtectProvide for</u> or restore their natural functioning; and ... e) [delete item] ... g) <u>Provide for the use, development and</u>	<ul style="list-style-type: none"> <li>Should be cautious about calling for protection without any consideration of a proposal.</li> <li>Policy 2.1.2 (j) risks being impossible to implement. In general, the use of the word "avoid", especially post-King Salmon, is the same as saying "prohibited".</li> <li>The deletion of Policy 2.1.2(e) is proposed to provide for a range of approaches to avoiding, remedying or mitigating the effects of</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><del>p</del>Protection of Kai Tahu values; and</p> <p>...</p> <p>j) Avoid, <del>remedy or mitigate</del> the adverse effects of pest species, prevent their introduction and reduce their spread; and</p> <p>..."</p>	development, to include compensatory and offsetting approaches.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Support subject to the following amendment [to item b)]: "b) <u>Provide for the use, development and <del>p</del>Protection of Kai Tahu values; and</u> "	<ul style="list-style-type: none"> <li>The RMA provides for effects-based or integrated management, i.e., consideration of proposals for use and development in the context of proposals to avoid, remedy or mitigate their effects on the values present in the land.</li> <li>Should be cautious about calling for protection without any consideration of a proposal.</li> </ul>
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Support subject to the following amendments [as follows]: " <del>...g) Provide for the use, development and <del>p</del>Protection of Kai Tahu values; and</del> ... k) <del>Avoid, remedy or mitigate</del> contamination of soil; and l) <del>Avoid, remedy or mitigate</del> the adverse effects of pest species, prevent their introduction and reduce their spread; and ..."	<ul style="list-style-type: none"> <li>The RMA provides for effects-based or integrated management, i.e., consideration of proposals for use and development in the context of proposals to avoid, remedy or mitigate their effects on the values present in the land.</li> <li>Should be cautious about calling for protection without any consideration of a proposal.</li> <li>Policy 2.1.5 (l) risks being impossible to implement.</li> <li>In general, the use of the word "avoid", especially post-King Salmon, is the same as saying "prohibited".</li> </ul>
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Amend	Support subject to the following amendment: "Otago's significant and highly valued natural resources are identified, and <del>protected</del> <u>maintained</u> or enhanced."	<ul style="list-style-type: none"> <li>The RMA provides for effects-based or integrated management, i.e., consideration of proposals for use and development in the context of proposals to avoid, remedy or mitigate their effects on the values present in the land.</li> <li>It is important to identify places or sites of importance for one value or another. But this does not mean a priori that total protection of such places via a stipulation to avoid all adverse effects, is always the appropriate management outcome.</li> <li>Should be cautious about calling for protection without any consideration of a proposal.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Support subject to the following amendments: " <del>Protect</del> <u>Maintain</u> and enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) <del>Avoiding, remedying or mitigating</del> adverse effects on those values which contribute to the area or habitat being significant; and b) <del>Avoiding significant adverse effects</del> on other values of the area or habitat; and c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and d) <del>Remedying, when adverse effects cannot be avoided; and</del> e) <del>Mitigating where adverse effects cannot be avoided or remediated; and</del> f) Encouraging enhancement of those areas and values.	<ul style="list-style-type: none"> <li>The RMA provides for effects-based or integrated management, i.e., consideration of proposals for use and development in the context of proposals to avoid, remedy or mitigate their effects on the values present in the land.</li> <li>Should be cautious about calling for protection without any consideration of a proposal.</li> <li>In general, the use of the word "avoid", especially post-King Salmon, is the same as saying "prohibited".</li> <li>Policy 2.2.2(f) falls within compensatory measures for managing the effects of activities, to achieve sustainable management. This falls within the construct of integrated management.</li> </ul>
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	Support subject to the following amendments: " <del>Protect</del> <u>Maintain</u> , enhance and restore the values of outstanding natural features, landscapes and seascapes, by: a) <del>Avoiding, remedying or mitigating</del> adverse effects on those values which contribute to the	<ul style="list-style-type: none"> <li>The RMA provides for effects-based or integrated management, i.e., consideration of proposals for use and development in the context of proposals to avoid, remedy or mitigate their effects on the values present in the land.</li> <li>Should be cautious about calling for protection without any consideration of a proposal.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>significance of the natural feature, landscape or seascape; and</p> <p>b) <del>Avoiding, remedying or mitigating</del> other adverse effects on other values; and</p> <p>...</p> <p>e) <del>Avoiding, remedying or mitigating</del> <b>Controlling</b> the adverse effects of pest species, preventing their introduction and reducing their spread; and</p> <p>f) Encouraging enhancement of those areas and values."</p>	<ul style="list-style-type: none"> <li>• In general, the use of the word "avoid", especially post-King Salmon, is the same as saying "prohibited".</li> <li>• Policy 2.2.4(f) falls within compensatory measures for managing the effects of activities, to achieve sustainable management. This falls within the construct of integrated management.</li> </ul>
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	<p>Support subject to the following amendments:</p> <p>"<del>Protect</del> <b>Maintain</b>, or enhance the values of special amenity landscapes and highly valued natural features, by:</p> <p>a) <del>Avoiding, remedying or mitigating</del> significant adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and</p> <p>b) <del>Avoiding, remedying or mitigating</del> other adverse effects on other values; and</p> <p>...</p> <p>e) <del>Avoiding, remedying or mitigating</del> <b>Controlling</b> the adverse effects of pest species, preventing their introduction and reducing their spread; and</p> <p>f) Encouraging enhancement of those values."</p>	<ul style="list-style-type: none"> <li>• The RMA provides for effects-based or integrated management, i.e., consideration of proposals for use and development in the context of proposals to avoid, remedy or mitigate their effects on the values present in the land.</li> <li>• Should be cautious about calling for protection without any consideration of a proposal.</li> <li>• In general, the use of the word "avoid", especially post-King Salmon, is the same as saying "prohibited".</li> <li>• Policy 2.2.6(f) falls within compensatory measures for managing the effects of activities, to achieve sustainable management. This falls within the construct of integrated management.</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	<p>Support subject to the following amendments:</p> <p>"<del>Preserve</del> <b>Maintain</b>, or enhance the natural character values of the coastal environment, by:</p> <p>a) <del>Avoiding, remedying or mitigating significant</del> adverse effects on those values which contribute to the outstanding natural character of an area; and</p> <p>b) <del>Avoiding, remedying or mitigating</del> significant adverse effects on those values which contribute to the high natural character values of an area; and</p> <p>...</p> <p>g) <del>Avoiding, remedying and mitigating</del> <b>Controlling</b> the adverse effects of pest species, prevent their introduction and reduce their spread."</p>	<ul style="list-style-type: none"> <li>• The RMA provides for effects-based or integrated management, i.e., consideration of proposals for use and development in the context of proposals to avoid, remedy or mitigate their effects on the values present in the land.</li> <li>• Should be cautious about calling for protection without any consideration of a proposal.</li> <li>• In general, the use of the word "avoid", especially post-King Salmon, is the same as saying "prohibited".</li> <li>• Policy 2.2.9(f) falls within compensatory measures for managing the effects of activities, to achieve sustainable management. This falls within the construct of integrated management.</li> </ul>
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	<p>Support subject to the following amendments:</p> <p>"<del>Protect</del> <b>Maintain</b>, or enhance the values of outstanding water bodies and wetlands by:</p> <p>a) <del>Avoiding, remedying or mitigating</del> significant adverse effects, including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and</p> <p>...</p> <p>d) <del>Avoiding, remedying and mitigating</del> <b>Controlling</b> the adverse effects of pest species, prevent their introduction and reduce their spread, and</p> <p>..."</p>	<ul style="list-style-type: none"> <li>• The RMA provides for effects-based or integrated management, i.e., consideration of proposals for use and development in the context of proposals to avoid, remedy or mitigate their effects on the values present in the land.</li> <li>• Should be cautious about calling for protection without any consideration of a proposal.</li> <li>• In general, the use of the word "avoid", especially post-King Salmon, is the same as saying "prohibited".</li> <li>• Policy 2.2.13(d) falls within compensatory measures for managing the effects of activities, to achieve sustainable management. This falls within the construct of integrated management.</li> </ul>
57	Highly valued natural resources -	Policy 2.2.15 - Managing highly	Amend	Support subject to the following amendments:	<ul style="list-style-type: none"> <li>• The RMA provides for effects-based or integrated management, i.e.,</li> </ul>



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	soil resources	valued soil resources		"Protect <del>Maintain</del> the values of areas of highly valued soil resources, by: a) Avoiding, <del>remediating or mitigating</del> significant adverse effects on those values which contribute to the soil being highly valued; and b) <del>Avoiding, remediating or mitigating</del> other adverse effects on values of those soils; and ..."	consideration of proposals for use and development in the context of proposals to avoid, remedy or mitigate their effects on the values present in the land. • Should be cautious about calling for protection without any consideration of a proposal. • In general, the use of the word "avoid", especially post-King Salmon, is the same as saying "prohibited".
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	Support subject to [the addition of new item c)]: "c) Recognising that mining and quarrying and petroleum production earn high wealth off a small footprint, and are a temporary use of land, and that sites are rehabilitated to a former use, a new use or an enhanced use."	• Mining and quarrying entails borrowing the land, mining the land, and returning the land — this is a temporary land-use, and should be recognised and provided for in the context of integrated management. • It would take more than 700 years of farming at Macraes to earn the same wealth as expected during the life of the Macraes mine (20-30 years). • As mining progresses, the land is rehabilitated and returned into pasture. That new pasture is typically more productive for farming than it was previously. • Mineral exploration and mining, and the use of mined and quarried minerals, are significant economic activities in Otago, are connected to the regional economy, and deserve specific mention.
64	Natural systems and interdependencies	Policy 2.3.5 - Applying an integrated management approach for airsheds	Amend	Support subject to the following amendment: "b) Co-ordinating the management of land use and air quality, to: 1. Maintain or enhance, <u>where degraded</u> , air quality values; and ii. Reduce the potential for adverse health and nuisance effects; <u>and</u> iii. <u>Where appropriate, provide for sustainable economic growth.</u> "	• As written, Policy 2.3.5 would lead to the prevention of all new industry in Otago. There will be areas where a degree of impoverishment of air quality will be admissible. • Refer to the Canterbury RPS Policy 14.3.3.
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Support [Objective 3.1] subject to the following amendment: "Protection, use and development of natural and physical resources recognises environmental constraints <u>and the need for people and communities to provide for their social, economic and cultural wellbeing.</u> "	• To avoid the sterilisation of resources that Otago will need in the future • Council seems to be taking a NIMBY approach to resource extraction and use.
77	Recognition of environmental constraints	Policy suite 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	An additional policy may be required to provide the appropriate balance to this section.	• To avoid the sterilisation of resources that Otago will need in the future • Council seems to be taking a NIMBY approach to resource extraction and use.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Support subject to the following amendment [to items c) and e) as follows]: "c) The sensitivity of the natural and physical resources to adverse effects from the <del>proposed</del> <u>inappropriate</u> activity/land use; and ... e) The functional necessity for the activity to be located where there are significant constraints, <u>e.g., mineral, aggregate and petroleum resources.</u> "	• The RMA provides for effects-based or integrated management, i.e., consideration of proposals for use and development in the context of proposals to avoid, remedy or mitigate their effects on the values present in the land. • After such consideration, some activities could be deemed inappropriate while other would go ahead subject to appropriate conditions. • This approach is particularly important for minerals and petroleum as location-specific resources. Although the PRPS contains reference to this issue, it is not in a way that is integrated effectively into the document as a whole.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	Support subject to the following amendment [to item b) iv. as follows]: "iv. Natural and physical resource constraints, <u>including the availability of mineral resources, e.g., aggregates; and</u> ".	To recognise the issue of sterilisation of aggregate resources, and to connect with other policies to do with the location specificity of mineral resources.

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99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	Support subject to the following amendment [to items b) and d]): <b>"b) Reduce <u>Avoid, remedy or mitigate</u> adverse effects of those activities, including cumulative adverse effects on natural and physical resources; and</b> ... <b>d) Improve efficiency of use <u>and development</u> of natural resources, <u>including mineral and aggregate resources</u>; and</b> ..."	<ul style="list-style-type: none"> <li>Item (d) is very important in the minerals context. The regulatory burden from sourcing aggregates from riverbeds (e.g. for flood protection works) is excessive, and aggregates is sourced at greater expense from an existing quarry elsewhere in the region or from further afield. This is inefficient.</li> <li>The RMA provides for effects-based or integrated management, i.e., consideration of proposals for use and development in the context of proposals to avoid, remedy or mitigate their effects on the values present in the land.</li> <li>Should be cautious about calling for protection without any consideration of a proposal.</li> <li>Amendment to provide adequate recognition of the role of minerals resources, in particular, aggregates, for infrastructure.</li> </ul>
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	Support subject to the following amendments: <b>"Minimise <u>Manage</u> adverse effects from infrastructure that has national or regional significance, by:</b> a) Giving preference to avoiding their location in: ... b) Where it is not possible to avoid locating in the areas listed in a) above, avoiding, <u>remedying or mitigating</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and and c) <del>Avoiding, remedying or mitigating</del> other adverse effects on values; and d) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and e) Considering the use of <del>offsetting, or other</del> compensatory measures, for residual adverse effects on indigenous biodiversity."	<ul style="list-style-type: none"> <li>The RMA provides for effects-based or integrated management, i.e., consideration of proposals for use and development in the context of proposals to avoid, remedy or mitigate their effects on the values present in the land.</li> <li>Should be cautious about calling for protection without any consideration of a proposal.</li> <li>In general, the use of the word "avoid", especially post-King Salmon, is the same as saying "prohibited".</li> <li>The consideration of biodiversity offsetting is a laudable goal, but there is little by way of court-accepted examples that fall within the internationally-accepted definition of this term.</li> <li>There are other options, from "avoid, remedy or mitigate" through environmental compensation and ultimately to biodiversity offsetting.</li> <li>The RPS should not limit itself to just the latter because all of the foregoing are equally valid management tools.</li> </ul>
114	Energy	Policy 3.6.6 - Reducing long term demand for fossil fuels	Amend	Support subject to the following amendments: "Reducing long term demand <u>for and safeguarding supply of</u> for fossil fuels <del>Manage Reduce</del> the long term demand for fossil fuels from Otago's communities, by: ... c) ...; <u>and</u> d) <u>Safeguarding the supply of fossil fuels by encouraging the exploration and mining of coal and lignite, and the exploration and extraction of petroleum.</u> "	<ul style="list-style-type: none"> <li>The driver for "lower emission transport fuels" is climate change policy. Greenhouse gas emissions are addressed under the Climate Change Response Act 2002, not the RMA.</li> <li>The creation and dissemination of lower-emission transport fuels depend on advances in cost-effective technologies, and on New Zealand's global competitiveness.</li> <li>The region also has the potential to develop local energy resources, and derive economic benefits from that, as well as increased resilience.</li> <li>There is no particular reason, under section 7(j) of the RMA, to favour one type of energy over another.</li> </ul>
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	Support subject to amendments sought: Manage subdivision, use and development of rural land, to: a) <u>Avoid, remedy or mitigate</u> development or fragmentation of land which undermines or forecloses the potential of rural land: i. For primary production, <u>including minerals and petroleum prospecting, exploration and mining and production</u> ; or ... b) Have particular regard to whether the proposal will result in a loss of the productive	<ul style="list-style-type: none"> <li>The RMA provides for effects-based or integrated management, i.e., consideration of proposals for use and development in the context of proposals to avoid, remedy or mitigate their effects on the values present in the land.</li> <li>Should be cautious about calling for protection without any consideration of a proposal.</li> <li>In general, the use of the word "avoid", especially post-King Salmon, is the same as saying "prohibited".</li> <li>Amendment to provide adequate recognition of minerals and petroleum activities.</li> <li>Mining is almost always a higher-value use of land than any other activity, and that mining is a temporary land use. Land is returned to</li> </ul>

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				<p>potential of highly versatile soil, unless:</p> <p>...</p> <p>iii. reverse sensitivity effects on rural productive activities can be avoided, <u>remedied or mitigated</u>; and</p> <p>iv. <u>Mining or quarrying activities are considered, noting these are a temporary land-use and noting requirements for rehabilitation of disturbed ground post mine or quarry closure to a former use, a new use or an enhanced use; [and]</u></p> <p>c) Avoid, <u>remedy or mitigate</u> unplanned demand for provision of infrastructure, including domestic water supply and waste disposal; and</p> <p>d) Avoid, <u>remedy or mitigate the creation of</u> competing demand for water or other resources.</p>	<p>farmland and is often more productive.</p> <ul style="list-style-type: none"> <li>• Where there is competing demand for resources, there is an argument for that resource to be transferred into the highest-value use.</li> </ul>
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Oppose	Delete Policy 3.9.2.	To avoid unnecessary and counterproductive regulatory duplication with HSNO Act regime.
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Support subject to the following amendments sought: "Avoiding, <u>remedying or mitigating</u> the creation of new contaminated land Avoid, <u>remedy or mitigate</u> the creation of new contaminated land."	To provide appropriately for the creation of tailings dams and the like at gold mines. These are temporary structures or earthworks during the operation of a mine; they do contain contaminants; and they are contained as part of their management.
135	Hazardous substances and waste	Policy 3.9.6 - Encouraging use of best management practices for hazardous substance use	Oppose	Delete Policy 3.9.6.	To avoid unnecessary and counterproductive regulatory duplication with HSNO Act regime.
149	Historic heritage	Policy 4.2.1 - Recognising heritage themes	Amend	Support subject to the following amendment sought [to item f]): "f) Gold <u>and other</u> mining systems and settlements;"	Otago contains historic heritage in relation to, for example, scheelite.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Support subject to the following amendments: " <u>Manage</u> <del>Protect</del> and enhance the values of places and areas of historic heritage, by: ... c) Avoiding, <u>remedying or mitigating</u> adverse effects on those values which contribute to the area or place being of regional or national significance; and d) Avoiding, <u>remedying or mitigating</u> significant adverse effects on other values of areas and places of historic heritage; and e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and f) <del>Remediating, when adverse effects on other values cannot be avoided or remediated;</del> and f <del>h</del> ) Encouraging the integration of historic heritage values into new activities; and g <del>i</del> ) Enabling adaptive reuse or upgrade of historic heritage places and areas where heritage values can be maintained."	<ul style="list-style-type: none"> <li>• To avoid potential overlap or regulatory duplication with the Heritage New Zealand Pouhere Taonga Act 2014.</li> <li>• Mining today is often done where mining was done in the past. What the old-timers left behind has become today's heritage.</li> <li>• Mitigation hierarchy when managing effects runs the risk of sub-optimal outcomes. The RMA thus provides for the simultaneous consideration of avoiding, remedying or mitigation of effects, for greater flexibility, and better environmental and heritage outcomes.</li> </ul>
155	Land management for economic	Policy 4.3.1 - Managing for rural	Amend	Support subject to the following amendments:	<ul style="list-style-type: none"> <li>• Care is needed to avoid "picking winners" by deciding arbitrarily on</li> </ul>

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	production	activities		"Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling farming and other rural activities, <u>including minerals and petroleum activities</u> , that support the rural economy; and b) <del>Avoiding, remedying or mitigating</del> <u>Minimising</u> the loss of soils highly valued for their versatility for primary production; and c) Restricting the establishment of activities in rural areas that may lead to reverse sensitivity effects; and d) <del>Avoiding, remedying or mitigating</del> <u>Minimising</u> the subdivision of productive rural land into smaller <u>allotments</u> lots that may result in rural residential activities; and e) Providing for other activities that have a functional need to locate in rural areas, including tourism and recreational activities that are of a nature and scale compatible with rural activities and minerals and petroleum activities."	what is a better use of resources. If favouring farmland remaining farmland stems from landscape concerns, better to address this as a landscape issue. <ul style="list-style-type: none"> <li>Mineral exploration and mining, and the use of mined and quarried minerals, are significant economic activities in Otago, are connected to the regional economy, and deserve specific mention.</li> <li>The RMA provides for effects-based or integrated management, i.e., consideration of proposals for use and development in the context of proposals to avoid, remedy or mitigate their effects on the values present in the land. This approach is particularly important for minerals and petroleum as location-specific resources.</li> <li>Should be cautious about calling for protection without any consideration of a proposal.</li> </ul>
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Amend	Support subject to the following amendments: "Manage land use change in dry catchments, to avoid any significant reduction in water yield, by: a) <del>Avoiding, remedying or mitigating the adverse effects of</del> <u>Restricting</u> any extension of forestry activities within those catchments that would result in a significant reduction in water yield, including cumulative reductions; and b) <del>Avoiding, remedying or mitigating</del> <u>Minimising</u> the conversion of tussock grasslands to species which are less able to capture and hold precipitation."	<ul style="list-style-type: none"> <li>If forestry led to more overall economic activity, despite lower water yield, then, this may be a better use of land.</li> <li>If reduced water yield were to affect downstream farmers without their agreement, the foresters ought to have to compensate those farmers appropriately.</li> <li>In the case of the Macraes gold mine, the community decided that it preferred former mining land to be rehabilitated into productive pasture, not native tussocklands.</li> </ul>
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	Support subject to the following amendments: "Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by: a) <del>Recognising that their use and development may be appropriate</del> <u>Giving preference to avoiding their location</u> in: i. .... b) Restricting the establishment of those activities in areas used for <u>existing or potential</u> mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects."	<ul style="list-style-type: none"> <li>As set out in the first sentence of this policy, mineral deposits can be mined or quarried only where they occur.</li> <li>Mineral activities, therefore, qualify as appropriate activities as opposed to "inappropriate" activities, within the meaning of, e.g., section 6 of the RMA.</li> <li>When considering proposals for avoiding, remedying and mitigating the effects of minerals activities, any significance of a site would form an automatic consideration.</li> <li>Note also the sequence of prospecting, exploration, mining feasibility studies, development and mining or quarrying. Hence the suggested inclusion of "existing or potential".</li> <li>Great care in wording is needed because of the King Salmon decision.</li> </ul>
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	Support subject to the following amendments [to list item c): "c) Encouraging collective coordination and rationing of take and use of water when river flows or aquifer levels are lowering, <u>or provide for the allocation of water to its highest-value use</u> , to avoid breaching any minimum flow or aquifer level restriction; and"	<ul style="list-style-type: none"> <li>The wording in this policy is detailed, while containing omissions.</li> <li>The question is what value this policy adds to the National Policy Statement for Freshwater Management 2014. It may be better to rely on the policy framework being developed under the NPSFM.</li> <li>The difficulty with the concept of "collective coordination and rationing" is that there is no discussion of efficiency in the use of water. In practical terms, an efficient water user will be reluctant to work collectively with an inefficient user of water.</li> </ul>
165	Making the most of available	Policy 4.4.3 - Encouraging	Support	Support.	In the context of managing effects on the environment, mining

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	resources	environmental enhancement			companies and other developers may include compensation activities among their proposals which could fall within this policy.
169	Management of adverse effects	Policy 4.5.2 - Applying an adaptive management approach	Support	Support.	Supported.
170	Management of adverse effects	Policy 4.5.3 - Applying emission standards on domestic fuel burners	Support	Support.	Supported.
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Support subject to the following amendments: <del>Minimise Avoid, remedy or mitigate</del> adverse effects from the exploration, extraction and processing of minerals, by: a) <del>Recognising that their use and development may be appropriate</del> Giving preference to <del>avoiding their location</del> in: ... b) Where it is not possible to avoid locating in the areas listed in a) above, <del>avoiding, remedying or mitigating</del> significant adverse effects of the activity on those values that contribute to the significant or outstanding nature of those areas; and c) <del>Avoiding, remedying or mitigating</del> adverse effects on the health and safety of the community; and d) <del>Avoiding, r</del> Remedying or mitigating adverse effects on other values; and e) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and, f) Reducing unavoidable adverse effects by i. Staging development for longer term activities, <del>where possible and reasonably practicable</del> ; and ii. Progressively rehabilitating the site, where possible, <del>and</del> g) Considering the use of <del>offsetting, or</del> compensatory measures, for residual adverse effects; and ...	For consistency with Policy 4.3.6, and with Policies 4.5.7 and 4.5.8, and other advocacy.
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Oppose	Delete Policy 4.5.7.	<ul style="list-style-type: none"> <li>• The treatment of biodiversity offsets is inconsistent with non-statutory guidance prepared by the DoC on offsets.</li> <li>• The framing of this topic is poor, incomplete and suggests inadequate knowledge of this highly-complex topic.</li> <li>• There is too much detail on some matters, with extensive omissions. This is not a biodiversity offsets framework.</li> <li>• Biodiversity offsetting is a tool to achieve an objective, not a policy approach per se. It is, arguably, inappropriate for inclusion in a RPS.</li> </ul>
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Oppose	Delete Policy 4.5.8.	<ul style="list-style-type: none"> <li>• The treatment of biodiversity offsets is inconsistent with non-statutory guidance prepared by the DoC on offsets.</li> <li>• The framing of this topic is poor, incomplete and suggests inadequate knowledge of this highly-complex topic.</li> <li>• There is too much detail on some matters, with extensive omissions. This is not a biodiversity offsets framework.</li> <li>• Biodiversity offsetting is a tool to achieve an objective, not a policy approach per se. It is, arguably, inappropriate for inclusion in a RPS.</li> </ul>
255	Other comments	Introduction - Overview and the	Amend	Support [Overview,] subject to amendment [to	Otago's environments include natural resources, and warrant specific

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		Otago Region		third paragraph on p. 3, after "wild environments" add]: " outstanding and wild environments, <u>abundant natural resources, prosperity...</u> "	mention.
255	Other comments	Introduction - Overview and the Otago Region	Amend	Support ["The Otago Region" section (p. 4),] subject to amendment to [fourth paragraph]: "Agriculture <u>currently forms</u> has formed the basis of Otago's economic development and continues to be a major source of revenue, <u>as does mining for gold and other minerals, including aggregates.</u> However, <del>†</del> Tourism now provides more than a quarter of Otago's Gross Domestic Product — the highest rate in New Zealand."	<ul style="list-style-type: none"> <li>• Otago was built on mining. The RPS should place more emphasis on the recognition of this fact.</li> <li>• Mineral exploration and mining, and the use of mined and quarried minerals, are significant economic activities in Otago, are connected to the regional economy, and deserve specific mention.</li> </ul>
265	Chapter B2 - High quality natural resources	Outcome 2 and introduction	Amend	Support [explanation to Chapter 2 "Otago has high quality natural resources and ecosystems" - page 23] subject to amendment [to the first sentence of paragraph one]: "Otago's economy is driven by <u>four</u> <del>three</del> sectors: primary production, <u>minerals and petroleum exploration and mining/production, and</u> tourism and education."	<ul style="list-style-type: none"> <li>• The general impression reading through the RPS is that minerals are an afterthought, whereas the sector should be considered on equal footing with any other activity.</li> <li>• Mineral exploration and mining, and the use of mined and quarried minerals, are significant economic activities in Otago, are connected to the regional economy, and deserve specific mention.</li> </ul>
269	Objectives on high quality natural resources	Introduction to Objective 2.1	Amend	Support [explanation to Objective 2.1 - page 26] subject to amendment [to the last sentence of the paragraph]: "A good quality resource management framework addresses all the values attached our resources, and identifies those which, <del>at places need</del> <u>merit particular attention when considering use and development and to provide for protection in some circumstances, where appropriate.</u> "	<ul style="list-style-type: none"> <li>• The RMA provides for effects-based or integrated management, i.e., consideration of proposals for use and development in the context of proposals to avoid, remedy or mitigate their effects on the values present in the land.</li> <li>• After such consideration, some activities could be deemed inappropriate while other would go ahead subject to appropriate conditions.</li> <li>• This approach is particularly important for minerals and petroleum as location-specific resources.</li> </ul>
270	Objectives on high quality natural resources	Introduction to Objective 2.2	Amend	Support [explanation to Objective 2.2 - page 32] subject to amendment [to the last sentence of the paragraph]: "Giving these a higher level of protection ensures they will be retained, while consumptive use of resources (e.g., <u>mining, quarrying and petroleum production</u> ) will be directed to areas where adverse effects are more acceptable, <u>if possible. If not, as minerals can only be mined where they exist, they may be recognised as appropriate activities in these areas dependent on the avoidance, remediation or mitigation measures adopted.</u> "	<ul style="list-style-type: none"> <li>• The RMA provides for effects-based or integrated management, i.e., consideration of proposals for use and development in the context of proposals to avoid, remedy or mitigate their effects on the values present in the land.</li> <li>• After such consideration, some activities could be deemed inappropriate while other would go ahead subject to appropriate conditions.</li> <li>• This approach is particularly important for minerals and petroleum as location-specific resources. Although the PRPS contains reference to this issue, it is not in a way that is integrated effectively into the document as a whole.</li> </ul>
271	Objectives on high quality natural resources	Introduction to Objective 2.3	Amend	Support [explanation to Objective 2.3 - page 39] subject to the following amendment [to the end of the last paragraph]: " <u>As a further example of the need for integrated management, mining is a high-value use of land, and is a temporary land use entailing the disturbance, and the subsequent rehabilitation or restoration of land when mining is completed, into a former use, an enhanced use or a new use. Once again, several different pieces of legislation will apply.</u> "	<ul style="list-style-type: none"> <li>• Mineral exploration and mining, and the use of mined and quarried minerals, are significant economic activities in Otago, are connected to the regional economy, and deserve specific mention.</li> <li>• It would take more than 700 years of farming at Macraes to earn the same wealth as expected during the life of the Macraes mine (20-30 years).</li> <li>• As mining progresses, the land is rehabilitated and returned into pasture. That new pasture is typically more productive for farming than it was previously.</li> </ul>
272	Chapter B3 - Resilience, health	Outcome 3 and introduction	Amend	Support [explanation to Chapter 3 heading	Opportunities in the region should be recognised.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	and safety			"Communities in Otago are resilient, safe and healthy" - page 43] subject to [following amendment to the end of paragraph one]: <u>"There are also opportunities in this area for the region."</u>	
282	Objectives on resilience, health and safety	Introduction to Objective 3.1	Amend	Support [explanation to Objective 3.1 - page 47] subject to amendment [to the last sentence of the paragraph]: "For example, there should be sufficient water supply available for a proposed activity, and efforts should be made to <u>avoid siting subdivisions on top of, or adjoining aggregate resources that may be needed for Otago's roading, civil engineering, electricity generation and other infrastructure needs.</u> "	<ul style="list-style-type: none"> <li>• To avoid the sterilisation of resources that Otago will need in the future</li> <li>• Council seems to be taking a NIMBY approach to resource extraction and use.</li> </ul>
285	Objectives on resilience, health and safety	Introduction to Objective 3.4	Amend	Support [explanation to Objective 3.4 - page 56] subject to the following amendment [after the first sentence of the first paragraph]: "...at the right time. <u>That includes the provision of materials for infrastructure development, such as aggregates, to appropriate specifications. Some infrastructure...</u> "	<ul style="list-style-type: none"> <li>• The RPS has largely ignored the strategic contribution of mineral resources to Otago.</li> <li>• Mineral exploration and mining, and the use of mined and quarried minerals, are significant economic activities in Otago, are connected to the regional economy, and deserve specific mention.</li> </ul>
287	Objectives on resilience, health and safety	Introduction to Objective 3.6	Amend	Support [explanation to Objective 3.6 - page 61] subject to the following amendments: "The social and economic well-being of Otago's people, and their health and safety, is dependent on their energy needs being met by a <u>reliable, affordable, environmentally sustainable</u> and secure supply of energy. More efficient energy uses, and a greater diversity of energy sources, <u>including local discovery and development of energy resources</u> , have the potential to increase community resilience, while increasing our ability to sustain economic growth. In particular, Otago's reliance on fossil-based transport fuels could be reduced in the medium to long term through more efficient or alternative transport fuels, <u>and the supply thereof could be safeguarded by encouraging local development of fossil fuels.</u> "	<ul style="list-style-type: none"> <li>• Objective is incomplete. Otago could also be a producer of fossil fuels, e.g., lignite depending on the economics, including the costs of managing greenhouse gases.</li> <li>• Coal and lignite are cost-effective sources of heat. Biomass has problems that need to be resolved for it to be a credible option for industrial process heating, in combination with fossil fuels.</li> <li>• The references to affordable and environmentally sustainable in addition to secure/reliable speak to the World Energy Council's "energy trilemma". Achieving all three objectives at the same time is difficult, and New Zealand ranks highly in the world on these indicators.</li> <li>• There is no particular reason, under section 7(j) of the RMA, to favour one type of energy over another.</li> </ul>
290	Objectives on resilience, health and safety	Introduction to Objective 3.9	Amend	Support [explanation to Objective 3.9 - page 70] subject to the following amendment [at the end of the paragraph]: " <u>It is noted that hazardous substances are currently comprehensively regulated under the Hazardous Substances and New Organisms Act 1996.</u> "	To avoid unnecessary and counterproductive regulatory duplication.
298	Objectives on use and enjoyment of natural and built environment	Introduction to Objective 4.2	Amend	Support [explanation to Objective 4.2 - page 78] subject to the following amendment [at the end]: " <u>A particular consideration is that mining is often done today where mining was done in the past; the effects of historical mining is today's heritage, and is amenable to integrated management.</u> "	What the old-timers in mining left behind has become today's heritage. Today's mining is often done where mining was done in the past.
299	Objectives on use and enjoyment	Introduction to Objective 4.3	Amend	Support [explanation to Objective 4.3 - page	Productive activity includes mineral and petroleum exploration and

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
	of natural and built environment			82] subject to the following amendment [to the first sentence]: "The use of land for productive activity, including minerals and petroleum exploration and extraction, underpins the economy of the region."	extraction.
301	Objectives on use and enjoyment of natural and built environment	Introduction to Objective 4.5	Amend	<p>Support [explanation to Objective 4.5 - page 87] subject to the following amendment [to first and second paragraphs]:</p> <p>Any use of natural or physical resources has the potential to generate adverse effects. It is important to manage activities to avoid, <u>remedy or mitigate</u>, individually or cumulatively, <u>significant adverse effects on degrading</u> the quality of Otago's natural environment. This requires the proactive management of natural resources, and can only be achieved through the integrated management of Otago's natural resources, and by giving due consideration to both managing adverse effects and maintaining and enhancing environmental values, <u>in the context of the benefits for Otago from the use and development of these resources</u>. Resource use can also have adverse effects on other uses, <u>future uses</u>, or prevent the normal operation of existing uses.</p> <p>Resource management decisions are often about arbitrating between conflicting values or uses. For example, Section 2.3 of this document identifies resources which are so significant that adverse effects on their values should be avoided, <u>remedied or mitigated appropriately</u>. Some activities, such as mineral <u>and petroleum</u> extraction or infrastructure development <u>or electricity generation</u>, may have to locate in areas containing significant values. If we are to provide for those activities, it is important to outline how their adverse effects should be managed.</p> <p>...</p>	For consistency with Policy 2.1.1 and other policies.

### 152 Terry Wilson

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	<p>Change the four outcomes to:</p> <ol style="list-style-type: none"> <li>1. The people of Otago have equal opportunities to participate in the democratic processes of the decision making that affects their communities.</li> <li>2. The infrastructure of the region and the management of the air, water and land enables the people to be prosperous and to enjoy the natural environment.</li> <li>3. The management of the infrastructure, air, water and land is done in a cost-effective way.</li> </ol>	<ul style="list-style-type: none"> <li>• Suggested changes would give effect to the LGA purpose of local government.</li> <li>• There should be no reference to "resilient" which to most has a vague meaning and to others it is a political "dog-whistle".</li> <li>• Kai Tahu values, rights and interests have no place in RPS because it is undemocratic to give preference to any particular racial, political or commercial entity. Kai Tahu does not represent all Maori of the region and will have a tendency to take advantage of any democratically advantaged status to advance its corporate activities. Democracy should not be race-based and Maori should be consulted with only to the extent provided by the law.</li> </ul>

### 153 Trevor Sangster



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
123	Urban growth	Policy suite 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Amend	Establish Permanent Urban Growth Boundaries to recognise environmental productive soils for which subdivision is disallowed, which in turn will deliver good urban design to support healthy & happy living environments.	No specific reason given.
251	Other comments	Implementation	Amend	Volunteer supporting documents to how you propose to administer a framework for the process of methods to take place delivering a result to statement with economy to scale.	To provide good solid foundation to the submissions I've made to lead Otago into the future. However there is no "Silver Bullet Plan". Deliberation is needed between the councils & communities to arrive at good management.
257	Matters beyond scope	Beyond the scope - general	Not Applicable	Complete a continual North South State Highway 1 with off/exit ramps to service the City of Dunedin. Including noise protection barriers placed road side.	No specific reason given.
257	Matters beyond scope	Beyond the scope - general	Not Applicable	Commission a Sewerage Treatment Plant located close to State Highway 1, between Green Island & Saddle Hill. Providing reclaimed water for irrigation to the Taieri Farming Precinct, which in turn manages Dunedin's growth.	No specific reason given.
257	Matters beyond scope	Beyond the scope - general	Not Applicable	Work & engage with Southland to promote the Southern Scenic Route:	<a href="http://www.southernscenicroute.co.nz/">http://www.southernscenicroute.co.nz/</a> maximises its potential.
257	Matters beyond scope	Beyond the scope - general	Not Applicable	Provide direct International Air Travel to arrive & depart Dunedin Airport.	No specific reason given.

#### 154 Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	The objectives and policies in Chapter 1 (the Kai Tahu pillar) need to be better reflected and interwoven throughout the remainder of the document.	Integration of Kai Tahu values throughout the document has resulted in both a lack of visibility and a lack of detail. The references to Kai Tahu values in the policies lack detail and the linkages to the Kai Tahu chapter are not clearly articulated.
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Describe the issues and needs at a resource specific level, and of the threats and challenges facing the region at a resource specific level.	Other than objectives and policies pertaining to climate change, the document does not adequately address possible future changes or threats to the Otago region.
4	Overall approach	Introduction - RPS framework	Amend	Reword the Kai Tahu pillar and accompanying narrative: "Kai Tahu values, rights and interests are <u>protected upheld</u> and <u>the expression of kaitiakitaka is expressed enabled</u> . The Treaty partnership between <u>takata whenua Kai Tahu</u> and the <u>Crown Otago Regional Council</u> , arising from Te Tiriti o Waitangi, provides a unique opportunity for resource management in <u>New Zealand Otago</u> ."	This key Kai Tahu 'Pillar' and the accompanying Treaty narrative need to be actively worded.
5	Overall approach	Introduction - The Treaty Partner	Amend	Amend the 1st paragraph as follows: "Kai Tahu considered that the Treaty bound the whole tribe of Kai Tahu and the Crown irrevocably to an <u>mutual</u> agreement which imposed responsibilities on both signatories. <del>the Crown and Kai Tahu.</del> "	Amendment would succinctly capture the mutual obligations that the Treaty imposes on the Crown and Kai Tahu.
5	Overall approach	Introduction - The Treaty Partner	Amend	• Merge the Takata Whenua / Manawhenua sections into one section as outlined below. New Paragraph: "Te Runanga o Ngai Tahu (the iwi authority) is made up of 18 papatipu runaka. <u>Te Runanga o Ngai Tahu encourages consultation with the papatipu runaka and takes</u>	The Te Runanga o Ngai Tahu Act 1996 provides that, where any act requires consultation with any iwi, this shall be held with Te Runanga o Ngai Tahu. In practice, Te Runanga accepts and encourages consultation with nga runaka in the first instance.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>into account the views of nga runaka when determining its own position. The four Otago runaka are Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou, and Hokonui Runanga."</p> <ul style="list-style-type: none"> <li>• Insert after this paragraph the Runaka map from the Manawhenua section on page 9.</li> </ul>	
5	Overall approach	Introduction - The Treaty Partner	Amend	New paragraph: "The interests of the Otago runaka are given in more detail in Schedule 1B (Interests specific to particular papatipu runaka). The Otago runaka share an interest in South Otago and the inland lakes and mountains with the Southland papatipu rimaka."	Text relocated from the Manawhenua section.
5	Overall approach	Introduction - The Treaty Partner	Amend	Reword the following paragraph: "In addition, there are whanau ropu (whanau grouping) associated with the papatipu runaka. Located predominantly in traditional coastal settlements, papatipu runaka are a focus for whanau and hapu (extended family groups) who have takata whenua status within their area. Takata whenua hold traditional customary authority and maintain contemporary relationships within an area determined by whakapapa (genealogical ties), resource use and ahi-ka-roa (the long burning fires of occupation)."	Reference to whanau ropu should be deleted from this section, but retained within Schedule 1B, as not a separate group in the iwi structure.
5	Overall approach	Introduction - The Treaty Partner	Amend	Delete the following paragraph: "Seasonal trips would be made from the coastal settlements to inland Otago to visit relations, harvest various species and gather plants and stone resources. Journeys were also made along the coast, including trips south to the Titi (Mutton Bird) Islands or north to trade. Trails along the Otago coast and inland became well established. Waterways and the coastal waters also provided transport routes."	To assist the restructuring of this section for clarity.
5	Overall approach	Introduction - The Treaty Partner	Amend	Reword the final paragraph of this section: "The papatipu runaka consultancy services, Kai Tahu Ki Otago Ltd. representing the Otago runaka, and Te Ao Marama Inc. representing the Southland runaka, provide a first point of contact and facilitate Kai Tahu engagement in resource management processes."	To clarify who Kai Tahu ki Otago and Te Ao Marama represent.
8	Objectives on Kai Tahu values	Issue 1.1 -Principles of the Treaty of Waitangi	Amend	Change "issue" "The principles of Te Tiriti o Waitangi are not formally codified and in many cases refer to broad concepts that need further exploration when applied to specific circumstances. This can make it challenging to effectively incorporate the principles of the Treaty into planning documents, as these principles are not formally codified in any way. <u>Effective planning tools and processes are required to give effect to the Treaty partnership between Kai Tahu and local authorities.</u> "	Remove references to 'codifying' and focus on the opportunities that a true Treaty partnership offers.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
9	Objectives on Kai Tahu values	Issue 1.2 - Kai Tahu values in resource management	Amend	<ul style="list-style-type: none"> <li>• Include a Kai Tahu resource management issues table either within this section or in a schedule.</li> <li>• See issues table attached to full submission (Appendix 2).</li> </ul>	To assist plan users to understand the resource management issues of significance to Kai Tahu.
9	Objectives on Kai Tahu values	Issue 1.2 - Kai Tahu values in resource management	Amend	<p>Amend issues as follows:  <u>"The mauri (life supporting capacity) and wairua of some places, sites, resources and values of cultural, spiritual or historic significance to takata whenua have been destroyed or degraded. Sometimes, there is limited or no access to important sites or mahika kai resources. Sometimes, It is has been difficult to use and develop Maori land for the purposes for which it was originally granted."</u></p>	<p>To recognise:</p> <ul style="list-style-type: none"> <li>• The impact of degradation on the mauri and wairua of places, sites, and resources.</li> <li>• Limits on access to sites or resources.</li> <li>• Constraints on the development of Maori Land.</li> </ul>
9	Objectives on Kai Tahu values	Issue 1.2 - Kai Tahu values in resource management	Amend	<p>Add issues:</p> <ul style="list-style-type: none"> <li>• <u>"There has been insufficient recognition of iwi management plans and use of Cultural Impact Assessments in resource management processes."</u></li> <li>• <u>"Often there is a lack of capacity and resources to enable tangata whenua to effectively engage in resource management processes."</u></li> </ul>	<ul style="list-style-type: none"> <li>• To understand the resource management issues of significance to Kai Tahu.</li> <li>• The building of capacity is a prerequisite for effective engagement by Kai Tahu in resource management processes.</li> </ul>
11	Objectives on Kai Tahu values	Objective 1.1 - The principles of Te Tiriti o Waitangi are taken into account in resource management decisions	Amend	<p>Amend objective as follows:  <u>"The principles of Te Tiriti o Waitangi are taken into account in resource management decision-making and relationships between local authorities and Kai Tahu."</u></p>	To clarify that the entire process of resource management decision-making needs to occur within a Treaty partnership framework, not just the decisions themselves; and to focus on the need for partnership in the relationship between local authorities and Kai Tahu.
13	Principles of Te Tiriti of Waitangi	Policy 1.1.1 - Promoting awareness of treaty obligations	Amend	<p>Amend Policy as follows  <u>"Promoting awareness and understanding of the Treaty Partnership obligations"</u></p> <p>Promote awareness and understanding of local authorities' obligations regarding the principles of Te Tiriti o Waitangi, tikaka Maori and kaupapa Maori <u>among Council decision-makers and staff and the wider community."</u></p>	Policy needs to go beyond promoting awareness and to identify the target audience.
16	Objectives on Kai Tahu values	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Amend	<p>Amend objective as follows  <u>"Kai Tahu values, rights and customary resources are protected and enhanced sustained."</u></p>	The use of active wording is recommended.
18	Kai Tahu values, rights, interests and customary resources	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend	<p>Reword policy as follows:  <u>"Policy 1.2.1 (Managing) Protect and enhance the values of the natural environment to support Kai Tahu wellbeing. Manage Protect and enhance the natural environment to support Kai Tahu wellbeing by:</u>  a) Ensuring resources <u>are healthy, abundant and accessible</u> to support their customary uses and cultural values <u>as detailed in Schedules 1A and B).</u>  b) Safeguarding the mauri (life-supporting capacity) of natural resources.</p>	<ul style="list-style-type: none"> <li>• There is an overlap between Policy 1.2.1 and 1.2.3. Policy 1.2.3 refers to the values of the natural environment, as detailed in Schedule 1A. This should sit within Policy 1.2.1.</li> <li>• The ability of Kai Tahu to provide for their cultural and economic wellbeing is dependent on access to healthy and abundant resources. The reference to Schedules 1A and B is limiting and should be removed.</li> <li>• To actively enable the expression of kaitiakitaka.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				c) <u>Enabling the expression of kaitiakitaka in the management of natural and physical resources.</u> "	
19	Kai Tahu values, rights, interests and customary resources	Policy 1.2.2 - Recognising important sites of cultural significance to Kai Tahu	Amend	Reword policy as follows: "Policy 1.2.2 Recognising <u>and protecting</u> sites <u>and landscapes</u> of cultural significance to Kai Tahu. Recognising and protecting <u>important sites and landscapes</u> of cultural significance to Kai Tahu <u>such as wahi tapu and other elements, including those sites and landscapes as detailed in Schedule 1C.</u> "	There is an overlap between Policy 1.2.2 and Policy 1.2.3. The recognition and protection of sites and landscapes of cultural significance to Kai Tahu should sit within Policy 1.2.2. This should then be followed by a policy that enables Kai Tahu relationships with wahi tupuna and associated sites.
19	Kai Tahu values, rights, interests and customary resources	Policy 1.2.2 - Recognising important sites of cultural significance to Kai Tahu	Amend	<ul style="list-style-type: none"> <li>Relocate Policy 1.2.3 paragraphs a) - c) to Policy 1.2.2 and amend as follows: "a) Avoiding significant adverse effects on those <u>values and sites and landscapes</u>, as detailed in Schedule 3; and b) Avoiding remedying or mitigating other adverse effects on those <u>values and sites and landscapes</u>; and c) <u>Managing Protecting</u> those <u>values and sites and landscapes</u> in a culturally appropriate manner."</li> <li>Add Method 1: Kai Tahu Relationships and Method 2: Regional, City and District Council Relationships</li> </ul>	The sites of cultural significance identified by Kai Tahu are by definition important. The mapping and protection of wahi tupuna should be undertaken collaboratively with Kai Tahu.
20	Kai Tahu values, rights, interests and customary resources	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend	Delete this policy.	Policy addressed by requested amendments to Policies 1.2.1 and 1.2.2.
21	Kai Tahu values, rights, interests and customary resources	Policy 1.2.4 - Enabling Kai Tahu relationships with wahi tupuna and associated sites	Amend	<ul style="list-style-type: none"> <li>Reword policy as follows: "Enabling Kai Tahu relationships with wahi tupuna and associated sites <u>and landscapes by</u> a) Facilitating Kai Tahu access to sites <u>and landscapes</u> of cultural significance; and b) Recognising that relationships between <u>sites and landscapes</u> of cultural significance are an important element of wahi tupuna; and c) Recognising <u>and using</u> traditional place names."</li> <li>Add Method 1— Kai Tahu Relationships.</li> </ul>	Wahi tupuna encompass sites, landscapes and the relationships between them.
22	Kai Tahu values, rights, interests and customary resources	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend	<p>Amend as follows: Enabling sustainable use <u>and development</u> of Maori land <u>and resources</u>.</p> <p>Enable Kai Tahu to protect, develop and use land <u>and resources</u> within native reserves in a way consistent with their culture and traditions, and economic, cultural and social aspirations, including for papakaika, <u>commercial uses</u>, marae and marae related activities, while: ...</p> <p>Add Method 1— Kai Tahu Relationships</p>	To enable Kai Tahu to provide for their cultural, social and economic wellbeing. Some commercial activities are also customary activities.
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	<p>[1C Wahi tupuna]</p> <ul style="list-style-type: none"> <li>Reflect glossary definition in introductory text.</li> <li>Change last sentence to read: "<u>These The</u></li> </ul>	For accuracy.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				different elements of these sites of significance include: ..."	
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Make following amendment to [1D Maori land reserves]: "Native Reserve excluded from the Otakou Land Purchases ( <del>1848</del> ) (1844)"	Correction.
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Make following amendment to [1D Native Reserves...]: "South Island Landless <del>Native Natives Act</del> "	Correction.
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Make following amendment to [1D Applicable legislation]: "Some lands, <u>such as</u> those at Port Chalmers, also fall under ..."	Words missing.
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Make following amendment to [1D Explanatory notes]: "Ancillary claim blocks are Maori freehold land <u>granted under the South Island Landless Natives Act 1906 to those who were left landless when the original reserves were granted.</u> and There are a number located throughout Otago."	Further detail
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Make following amendment to the 2nd paragraph of [1A Kai Tahu values]: "The nature of these relationships <del>defined</del> <u>defines</u> people's rights and responsibilities in relation to the use and management of resources in in-land Otago."	Correction.
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	[1A Rakatirataka] Delete: "The Kai Tahu ki Otago and Ngai Tahu ki Murihiku Natural Resource and Iwi Management Plans are an expression of rangatirataka. The active involvement of Kai Tahu in resource management decision-making processes is a practical means of giving effect to rakatirataka."	Correction.
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	[1B Interests specific...] Delete caption "Kati Huirapa Runaka Marae, Puketeraki. Replace with Puketeraki Marae"	Correction.
23	Kai Tahu values, rights, interests and customary resources	Schedule 1 - Takata whenua values and interests	Amend	Make following amendment to [1B Kati Huirapa Runaka ki Puketeraki]: "The kaimoana resources of the coast from Karitane to Okahau/Blueskin Bay and Purakaunui and the kai awa of the Waikouaiti River <u>and estuary</u> are treasured and well utilised..."	The estuary is equally important.
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	<ul style="list-style-type: none"> <li>Clearly articulate the issues for these important resources (air, land, water and the coast), including consideration of future threats, [to] enable an assessment of the effectiveness of the objectives in addressing issues.</li> <li>Kai Tahu values should be clearly integrated into the issues and visible within the objectives. Kai Tahu values need to be integrated into each objective in order to clearly articulate the linkages between this chapter and</li> </ul>	<ul style="list-style-type: none"> <li>To describe the issues or needs at a resource-specific level, and the threats and challenges facing the region at that level. The need for resource specific objectives for air, land, water and coast needs to be assessed.</li> <li>It is not directly apparent how these objectives give effect to the Kai Tahu objectives within Part B Chapter 1.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Chapter 1.	
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	Include a reference to the New Zealand Coastal Policy Statement and the National Policy Statement for Freshwater Management in the water and coastal specific objectives and policies.	To make reference to these statements.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Add estuaries to items a), h) and m).	Ngai Tahu cultural values do not support the mixing of stormwater and freshwater/coastal waters.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Amend item k): "Protect Kai Tahu values, <u>rights and interests</u> ; and"	Need specific policies to protect Kai Tahu interests.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Add further policies, to: <ul style="list-style-type: none"> <li>- Preference of discharge to land over discharge to water where adverse effects of discharge to land are less than discharge to water.</li> <li>- Avoid discharges (point and non-point source) to water and those discharges to land, where such discharges will have adverse effects on the life supporting capacity of the land.</li> <li>- Encourage/require where appropriate progressive upgrading of sewage and stormwater discharge to water to include land treatment.</li> <li>- Ensure the ability of Kai Tahu to exercise kaitiakitanga over water resources.</li> <li>- Manage water resources according to the philosophy and principle of ki uta ki tai.</li> <li>- Prioritise customary use and instream values over abstractions.</li> <li>- Establish sustainable environmental flow regimes that prioritise waterway health and estuarine values and where required, enhance water quality.</li> <li>- Identify and manage catchments where water quality is at risk by establishing water quality standards and where appropriate catchment contaminant load thresholds.</li> <li>- Manage the effects of rural land development (e.g. farming and mining) to ensure that water quality is maintained (or enhanced if it becomes degraded).</li> <li>- Prioritise efficiency in use of water</li> <li>- Protect, restore and enhance native riparian vegetation to provide habitat for taonga species and a buffer against intensive land use.</li> <li>- Recognise customary fishing tools such as mataitai.</li> <li>- Enhance freshwater biodiversity.</li> <li>- Use cultural monitoring tools to monitor the health of waterways.</li> <li>- Require a precautionary approach to the allocation of water or the intensification of land uses or discharges, in circumstances where the effects of these activities on freshwater bodies are unknown or uncertain.</li> <li>- Take a precautionary approach to consent</li> </ul>	Need greater policy guidance on water allocation, intensification, and discharges.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				duration. - Avoid mixing of water from different catchments.  Cross reference Policy 2.3.3, and other freshwater policies.	
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Add further policies to: - Manage water resources according to the philosophy and principle of ki uta ki tai and whole of catchment management. - Protect from inappropriate subdivision, use and development. - Manage effects of gravel and vegetation removal on Kai Tahu cultural values, ecological values, natural character, natural functioning of lakes and rivers, wellbeing (including cultural) of people and communities. - Specifically address access to and along river and lake beds, including: • maintenance and enhancement of Kai Tahu access to and along rivers and lakes, and sites associated with mahinga kai, wahi tapu and Wahl taonga • recognise and provide for Kai Tahu access in areas where public access is not appropriate. - Provide for fish passage and corridors for indigenous species. - Protect and enhance riparian zones that provide spawning or other significant habitat for species such as inanga. - Protect natural character of rivers and lakes. - Cross reference other policies relating to integrated management.	Policies not specific enough to provide clear direction on outcomes sought.
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Amend policy as follows: "a) <u>Protect support healthy coastal ecosystems and enhance degraded coastal ecosystems.</u> g) <u>Protect Kai Tahu values, rights, interests and objectives.</u> "	<ul style="list-style-type: none"> <li>• Concern at lack of issue identification and explanation in the PORPS, which will impact on its implementation. For example Policy 2.1.3(e) requires local authorities to: Maintain or enhance coastal values. But what are these values and how are they to be prioritised? The PORPS provides no guidance.</li> <li>• Ongoing recognition is required of the significance to Kai Tahu of activities occurring within, adjacent to, or impacting directly on the Statutory Acknowledgements contained within the Ngai Tahu Claims Settlement Act (ie beyond the expiry of Ngai Tahu Claims Settlement (Resource Management Consent Notification) Regulations 1999.</li> </ul>
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	Add further policies to: - Manage water resources according to the philosophy and principle of ki uta ki tai and integrated catchment management. - Avoid discharge of contaminants (including wastewater) to coastal waters. - Maintain and enhance Kai Tahu access to and along the coastal marine area for mahinga kai and sites of significance. - Avoid adverse effects on values of importance to Kai Tahu as a result of inappropriate coastal landuse, subdivision and development - Use cultural monitoring tools to monitor the	<ul style="list-style-type: none"> <li>• Concern at lack of issue identification and explanation in the PORPS, which will impact on its implementation. For example Policy 2.1.3(e) requires local authorities to: Maintain or enhance coastal values. But what are these values and how are they to be prioritised? The PORPS provides no guidance.</li> <li>• Ongoing recognition is required of the significance to Kai Tahu of activities occurring within, adjacent to, or impacting directly on the Statutory Acknowledgements contained within the Ngai Tahu Claims Settlement Act (ie beyond the expiry of NO Tahu Claims Settlement (Resource Management Consent Notification) Regulations 1999.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>health of coastal water bodies.</p> <ul style="list-style-type: none"> <li>- Manage effects of siltation (particularly on mahinga kai and associated habitat).</li> <li>- Maintain or enhance coastal water quality to a shellfish gathering water quality standard.</li> <li>- Recognise customary fisheries management tools such as mataitai, taiapure and rahui.</li> <li>- Ensure Kai Tahu access to mahinga kai and sites of cultural significance.</li> <li>- Recognise the unique environment the freshwater/seawater interface provides for species.</li> <li>- Recognise effects of existing and future structures on cultural values.</li> <li>- Increase knowledge of coastal environment and coastal processes.</li> <li>- Share information between authorities and Kai Tahu.</li> <li>- Recognise the increasing pressure being placed upon the coastal environment from the mining and petroleum industry which could have a negative impact on Otago's unique coastal environment. Provide guidance to assist in decision making around any applications for these activities.</li> </ul>	
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend policy as follows: "b) Protect Kai Tahu values <u>including protection of mahinga kai areas, wahi tapu sites and other sites of cultural significance to ensure these are not compromised by poor air quality.</u> "	No reference to NESAQ standards.
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Add further policies to: "Recognise and provide for specific cultural considerations when developing standards for air quality (eg Maori health, deposition of air pollutants on mahinga kai or marae)."	No reference to NESAQ standards.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend policy as follows: "g) Protect Kai Tahu values, <u>rights, interests and objectives;</u> "	Erosion, nutrient loss and sediment loss all have impacts on water quality and therefore Kai Tahu values.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	<ul style="list-style-type: none"> <li>• Add further policies to:</li> <li>Avoid and remedy significant induced: <ul style="list-style-type: none"> <li>• soil erosion</li> <li>• nutrient loss</li> <li>• sediment loss (particularly where it results in siltation of water bodies).</li> </ul> </li> <li>• Cross reference to Policy 2.2.14.</li> <li>• Cross reference siltation issues to freshwater and coastal policies</li> </ul>	Erosion, nutrient loss and sediment loss all have impacts on water quality and therefore Kai Tahu values.
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend policy as follows: "g) Protect <u>ecosystems</u> and biodiversity significant to Kai Tahu <u>including those valued as mahinga kai and taonga species, in a manner consistent with Kai Tahu values, rights and interests and principles;</u> and"	<ul style="list-style-type: none"> <li>• Does this include freshwater biodiversity and instream ecosystems or coastal ecosystems?</li> <li>• This policy overlaps with Policies 2.2.1 and 2.2.2 and is very confusing.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous	Amend	Add further policies to: - Restore ecosystems and indigenous	<ul style="list-style-type: none"> <li>• Does this include freshwater biodiversity and instream ecosystems or coastal ecosystems?</li> </ul>



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		biodiversity values		<p>biodiversity in locations where it will contribute to:</p> <ul style="list-style-type: none"> <li>• Inherent biological diversity</li> <li>• Otago's distinctive natural character</li> <li>• social, cultural, environmental and economic wellbeing of people and communities</li> <li>• greater connectivity between ecosystems and habitats.</li> </ul> <p>- Indicate priorities for protection.  - Require integrated and coordinated management across catchments, and land/sea boundary, between individuals, agencies, non-government organisations and Kai Tahu.  - Provide policy direction and criteria on use of offsets (developed with Kai Tahu).  - Include a specific wetland protection and enhancement policy.</p> <p>• Cross reference to Policy 2.2.1 and 2.2.2</p>	<ul style="list-style-type: none"> <li>• This policy overlaps with Policies 2.2.1 and 2.2.2 and is very confusing.</li> </ul>
37	Natural resource value management - general	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Amend	<ul style="list-style-type: none"> <li>• Provide policy guidance and methods for how the values of natural features, landscapes and seascapes will be "recognised".</li> <li>• Cross reference with Policies 2.2.3 and 2.2.4 (identification and management of outstanding natural landscapes) and Policies 2.2.5 and 2.2.6 (identification and management of special amenity landscapes and highly valued natural features).</li> </ul>	Policy directs recognition of values of natural features, landscapes and seascapes — but does not provide any policy guidance as to how.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Amend	<ul style="list-style-type: none"> <li>• [Biophysical attributes]: In b) include <u>wetlands</u></li> <li>• [Associative attributes]: In b) correct spelling to <u>tikaka</u> [Maori].</li> </ul>	Addition and correction.
38	Natural resource value management - general	Schedule 4 - Criteria for the identification of natural features and landscapes	Amend	<ul style="list-style-type: none"> <li>• Reference the importance of Kai Tahu association with rivers, lakes and their margins.</li> <li>• Add wetlands and hapua to 1(b)</li> </ul>	No reason given.
39	Natural resource value management - general	Policy 2.1.8 - Recognising the values of natural character in the coastal environment	Amend	Cross-reference to Policy 2.2.9 (Managing the natural character of the coastal environment)	No reason given.
40	Objectives on high quality natural resources	Objective 2.2 - Otago's significant and highly valued natural resources	Amend	Refer to Kai Tahu values in the Objective 2.2 description.	<p>Need to ensure that the objectives and policies in Chapter 2 and 3 do not undermine those in Chapter 1.</p> <p>It is not clear what the difference between Objective 2.1 and 2.2, and their corresponding policies, is.</p>
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Integrate Kai Tahu issues throughout this chapter, including a policy specifically about Kai Tahu water values (incorporating coastal and freshwater). Issues table (Appendix 2) sets out Kai Tahu issues.	<ul style="list-style-type: none"> <li>• Need to ensure that the objectives and policies in Chapter 2 and 3 do not undermine those in Chapter 1.</li> <li>• It is not clear what the difference between Objective 2.1 and 2.2, and their corresponding policies, is.</li> </ul>
42	Highly valued natural resources - indigenous biodiversity	Policy 2.2.1 - Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna	Amend	<ul style="list-style-type: none"> <li>• Add further policies to: Engage with Kai Tahu to identify areas, vegetation and habitat that has particular significance to Kai Tahu.</li> <li>• Add Method 1- Kai Tahu relationships to the Methods.</li> </ul>	<ul style="list-style-type: none"> <li>• Overlap with Policy 2.1.6 — confusing.</li> <li>• Indigenous vegetation and habitat of indigenous fauna may be significant to Kai Tahu for reasons that are cultural rather than ecological, such as mahinga kai resource area or containing mahinga kai species.</li> </ul>
43	Highly valued natural resources - indigenous biodiversity	Schedule 5 - Criteria for the assessment of significant indigenous vegetation and	Amend	Amend Schedule 5 to recognise Kai Tahu cultural values.	<ul style="list-style-type: none"> <li>• Schedule 5 outlines ecological significance criteria.</li> <li>• Indigenous vegetation and habitat of indigenous fauna may be significant to Kai Tahu for reasons that are cultural rather than</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		habitat of indigenous fauna			ecological, such as mahinga kai resource area or containing mahinga kai species.
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	Amend policy as follows: "Protect and enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna."	<ul style="list-style-type: none"> <li>• Overlap with Policy 2.1.6 — confusing.</li> <li>• Priorities for restoration or enhancement unclear.</li> </ul>
44	Highly valued natural resources - indigenous biodiversity	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Amend	<ul style="list-style-type: none"> <li>• Add further policies to: <ul style="list-style-type: none"> <li>- Protect areas, species and habitats of particular significance to Kai Tahu in a manner consistent with Kai Tahu values and principles.</li> <li>- Recognise Kai Tahu as kaitiaki.</li> <li>- Add a policy enabling Ngai Tahu cultural use of indigenous biodiversity according to tikaka.</li> <li>- Add priorities for restoration or enhancement, eg restore or enhance ecosystem functioning and indigenous biodiversity, in appropriate locations, particularly where it can contribute to Otago's distinctive natural character and identity and to the social, cultural, environmental and economic wellbeing of people and communities.</li> <li>- Add priorities for protection, including areas identified by Kai Tahu as having significant cultural value.</li> <li>- Add a specific wetland protection and enhancement policy.</li> <li>- Provide policy guidance on use of biodiversity offsets.</li> <li>- Use of cultural monitoring tools developed by Kai Tahu.</li> </ul> </li> <li>• Cross reference to new Policy under Objective 2.3 regarding integrated and coordinated approach to indigenous biodiversity management.</li> <li>• Add Method 1— Kai Tahu relationships</li> </ul>	<ul style="list-style-type: none"> <li>• Overlap with Policy 2.1.6 — confusing.</li> <li>• Priorities for restoration or enhancement unclear.</li> </ul>
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	Provide policy guidance and methods for how the values of natural features, landscapes and seascapes will be [identified].	Overlap with Policy 2.1.7.
45	Highly valued natural resources - landscapes & natural features	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend	<ul style="list-style-type: none"> <li>• Add further policies to: "Establish processes to engage with Kai Tahu in the identification of outstanding features and landscapes including Kai Tahu cultural landscapes."</li> <li>• Cross reference to Policy 2.1.7 and 2.2.4</li> </ul>	• Overlap with Policy 2.1.7.
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	<ul style="list-style-type: none"> <li>• Add further policies to: "Protect, enhance and restore Ngai Tahu cultural landscapes."</li> <li>• Add Method 3 (Regional, City and District Relationships)</li> <li>• Add Method 6 (Research monitoring and reporting)</li> <li>• Cross reference to Policy 2.1.7 and 2.2.3</li> </ul>	No reason given.
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	<ul style="list-style-type: none"> <li>• Add Method 6 (Research monitoring and reporting)</li> <li>• Add Method 3 (Regional, City and District Relationships)</li> </ul>	Item (d) —what are the 'existing introduced species' referring to? If existing introduced species are included here then indigenous species of significance to Kai Tahu should be too.
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal	Amend	Amend policy heading: "Preservation and restoration of managing the	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		environment		natural character of the coastal environment."	
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	<ul style="list-style-type: none"> <li>Amend policies as follows: "Preserve, <u>restore</u> or enhance the natural character values of the coastal environment, by: ...</li> <li>e) Encouraging enhancement of those values <u>including efforts by Kai Tahu to protect resources of the coastal environment through the use of customary management tools such as rahui, mataitai and taiapure.</u>"</li> <li>Cross reference to Policies 2.1.3, 2.1.6, 2.1.7, 2.1.8</li> </ul>	What is being referred to by (e)? Recognising and providing for contribution of existing introduced species to natural character of coastal environment?
54	Highly valued natural resources - outstanding water bodies	Policy 2.2.12 - Identifying outstanding water bodies and wetlands	Amend	<ul style="list-style-type: none"> <li>Amend policies as follows: "c) <del>Significant takata whenua</del> cultural values values as identified by Kai Tahu."</li> <li>Add Method 1: Kai Tahu Relationships.</li> <li>Cross reference to Policies 2.1.1, 2.1.2, 2.1.6.</li> </ul>	Kai Tahu must be involved in identifying cultural values associated with outstanding water bodies and wetlands.
55	Highly valued natural resources - outstanding water bodies	Policy 2.2.13 - Managing outstanding water bodies and wetlands	Amend	Add Method 1: Kai Tahu Relationships.	No reason given.
56	Highly valued natural resources - soil resources	Policy 2.2.14 - Identifying highly valued soil resources	Amend	<ul style="list-style-type: none"> <li>Amend policies as follows: "e) <u>Kai Tahu values</u> f) <u>Significance for supporting unique ecosystems, habitats and indigenous flora and fauna.</u>"</li> <li>Add Method 1 — Kai Tahu relationships</li> <li>Cross ref to Policy 2.1.5.</li> </ul>	No reason given.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	<ul style="list-style-type: none"> <li>Combine Policies 2.1.5 and 2.2.15</li> <li>Ensure Kai Tahu values are taken into account in managing soil resources.</li> <li>Add Method 1 — Kai Tahu relationships</li> </ul>	Overlap between this policy and Policy 2.1.5 as both about managing soil values.
58	Objectives on high quality natural resources	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Amend objective to: "Seek integrated management across catchments, between activities, and between agencies, Kai Tahu and community interests in order to recognise the interconnected nature of natural resource systems."	Natural resource systems and their interdependencies should be more than 'recognised' — objective needs to incorporate integrated management.
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Amend	Add new policy requiring integrated and coordinated management across catchments, and land/sea boundary, between individuals, agencies, non-government organisations and Kai Tahu.	No reason given.
60	Natural systems and interdependencies	Policy 2.3.1 - Applying an integrated management approach among resources	Amend	<ul style="list-style-type: none"> <li>Add further policies to: <ul style="list-style-type: none"> <li>Require integration within and across catchments, between activities and between agencies, Kai Tahu and people with interests in water management.</li> <li>Take into account the Kai Tahu principle and philosophy of Ki uta ki ta.</li> </ul> </li> <li>Add Method 1— Kai Tahu relationships</li> <li>Add Method 2 — Regional, City and District Council Relationships.</li> </ul>	No reason given.
61	Natural systems and interdependencies	Policy 2.3.2 - Applying an integrated management	Amend	<ul style="list-style-type: none"> <li>Add further policies to: <ul style="list-style-type: none"> <li>Require integration within and across</li> </ul> </li> </ul>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		approach within a resource		catchments, between activities and between agencies, Kai Tahu and people with interests in water management. <ul style="list-style-type: none"> <li>- Take into account the Kai Tahu principle and philosophy of Ki uta ki ta.</li> <li>• Add Method 1— Kai Tahu relationships</li> <li>• Add Method 2 — Regional, City and District Council Relationships.</li> </ul>	
62	Natural systems and interdependencies	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	Amend	<ul style="list-style-type: none"> <li>• Add further policies to: <ul style="list-style-type: none"> <li>- Add new policy as (c)(v) to protect Kai Tahu values, rights and interests.</li> <li>- Take into account the Kai Tahu philosophy and principle of Ki Uta Ki Tai (from the mountains to the sea).</li> <li>- Require integration within and across catchments, between activities and between agencies, Kai Tahu and people with interests in water management.</li> <li>- Provide for kaitiakitanga.</li> <li>- Recognise the interconnectivity between surface water and groundwater.</li> </ul> </li> <li>• Add Method 1— Kai Tahu relationships</li> <li>• Add Method 2 — Regional, City and District Council Relationships</li> </ul>	No reason given.
63	Natural systems and interdependencies	Policy 2.3.4 - Applying an integrated management approach for the coastal environment	Amend	<ul style="list-style-type: none"> <li>• Add further policies to: <ul style="list-style-type: none"> <li>- Add new policy as b(iii) to protect Kai Tahu values, rights and interests.</li> <li>- Take into account the Kai Tahu philosophy and principle of Ki Uta Ki Tai (from the mountains to the sea).</li> <li>- Require integration within and across catchments, between activities and between agencies, Kai Tahu and people with interests in water management.</li> <li>- Provide for kaitiakitanga.</li> </ul> </li> </ul> <p>Add Method 1— Kai Tahu relationships Add Method 2 — Regional, City and District Council Relationships</p>	No reason given.
66	Objectives on resilience, health and safety	Issue 3.1 - Risk of overreaching the environment's carrying capacity	Amend	Amend issue to reflect that activities are undertaken without regard not just to their local environment but wider environment (for example, water extraction can have effects far downstream).	No reason given
76	Objectives on resilience, health and safety	Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	Amend objective as follows: Acknowledge that environmental constraints may change in the future.	No reason given.
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Amend policy as follows: <ul style="list-style-type: none"> <li>• "a) The availability of natural resources <u>now and in the future</u> necessary to sustain the activity; and"</li> <li>• Include a reference to the "life of the activity" within clauses b - d.</li> </ul>	What is the level of understanding of current and likely future environmental constraints? This policy should provide more guidance for decision-makers.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
78	Recognition of environmental constraints	Policy 3.1.1 - Recognising natural and physical environmental constraints	Amend	Add policies to: - Acknowledge that relevant information must be available to give effect to Policy 3.1.1. - Review available information and identify current and future environmental constraints in the region. - Include a clause that references the effect on Kai Tahu values. - Require decision-makers to take environmental constraints (current and likely future state) into account.	What is the level of understanding of current and likely future environmental constraints? This policy should provide more guidance for decision-makers.
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Add Methods 3 and 4 (as natural hazards should be identified in planning documents) and 8 (as information should be shared).	Natural hazards should be identified in planning documents; and information should be shared.
83	Natural hazard risk	Policy 3.2.3 - Assessing natural hazard consequence	Amend	<ul style="list-style-type: none"> <li>• Add further policies to: Include new sub point for "effects on Kai Tahu values and sites of significance".</li> <li>• Add Method 1— Kai Tahu Relationships</li> </ul>	Effects on Kai Tahu values and sites of significance, as a consequence of natural hazards, have not been included.
84	Natural hazard risk	Policy 3.2.4 - Managing natural hazard risk	Amend	Add new policy to: Require integrated and coordinated management of and preparedness for natural hazards.	Confusing title - this policy is not about the management actions, it is about the approach to hazard management.
89	Natural hazard risk	Policy 3.2.9 - Protecting features and systems that provide hazard mitigation	Amend	<ul style="list-style-type: none"> <li>• Add or amend policies to: - Protect, restore, enhance and promote the use of natural or modified features and systems, which contribute to mitigating the effects of both natural hazards and climate change, whilst having regard for Kai Tahu cultural values and potential effects on sites of Kai Tahu significance.</li> <li>- Recognise and provide for the role of wetlands and riparian areas to help avoid or reduce the impact of natural hazards</li> <li>• Add Method 1— Kai Tahu Relationships</li> </ul>	The potential flow-on effects of hazard mitigation on areas of Kai Tahu significance and cultural values could be better considered in this policy.
90	Natural hazard risk	Policy 3.2.10 - Mitigating natural hazards	Amend	<ul style="list-style-type: none"> <li>• Add further policies to: - Avoid or mitigate adverse effects from hazard mitigation on people, property, the environment and Kai Tahu values.</li> <li>- Recognise the role of wetlands and riparian areas to help avoid or reduce the impact of natural hazards.</li> <li>• Add Method 1</li> </ul>	<ul style="list-style-type: none"> <li>• Hazard mitigation works have the potential to adversely affect values of importance to Kai Tahu (including the natural environment such as taonga species, building environment and cultural landscapes such as marae, and other values such as wahi tapu).</li> <li>• Effects on Kai Tahu values and sites of significance should be considered when assessing the acceptability of physical works to mitigate hazards. For example, gravel extraction and other river works for flood management have the potential to adversely affect mahinga kai and taonga species (habitat for nesting birds, fish passage). Activities in the margins of rivers or coastal protection works may adversely affect wahi tapu.</li> </ul>
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Amend	<ul style="list-style-type: none"> <li>• Add further policies to: - Avoid or mitigate adverse effects from hazard mitigation on people, property, the environment and Kai Tahu values.</li> <li>• Add Method 1— Kai Tahu relationships</li> </ul>	No reason given.
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	<ul style="list-style-type: none"> <li>• Amend policy as follows: "b) viii) Effects on Kai Tahu cultural values including sites of significance</li> <li>c) Managing urban growth: i. Within areas that have sufficient infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>• Infrastructure must be designed and located in a way that protects Kai Tahu cultural values and significance sites.</li> <li>• This policy does not clearly provide for papakaika and in some cases could be obstructive to their development due to their sometimes</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				capacity; or ii. Where infrastructure services can be upgraded or extended efficiently and effectively iii. <u>supporting the development of papakaika; and</u> e) <u>Ensure new development includes land treatment of sewage and stormwater and encourage/require where appropriate progressive upgrading of sewage and stormwater discharge to water to include land treatment.</u> • Add Method 1— Kai Tahu relationships.	remote location (i.e. away from established infrastructure).
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	<ul style="list-style-type: none"> <li>Reword policy as follows: "Manage infrastructure activities, to: a) Maintain <del>or</del> <u>and</u> enhance the health and safety of the community; and b) <u>Maintain and enhance Kai Tahu values and sites of significance</u> b) Reduce adverse effects of those activities, including cumulative adverse effects on natural and physical resources, <u>including mahinga kai</u>; and c) Support economic, social, <u>cultural</u>, and community activities; and d) Improve efficiency of use of natural resources; and e) Protect infrastructure corridors for infrastructure needs, now and for the future; and f) Increase the ability of communities to respond and adapt to emergencies, and disruptive or natural hazard events; and g) Protect the functioning of lifeline utilities and essential or emergency services." • Add Method 1— Kai Tahu relationships</li> </ul>	To provide for the protection of Kai Tahu values to the same extent that it protects other values
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Amend	<ul style="list-style-type: none"> <li>Include new points: - (a)(v): <u>Areas of value to Kai Tahu</u> - (a)(vi) <u>Cultural landscapes</u> • Add Method 1— Kai Tahu relationships • Cross reference other policies relating to natural resources in chapter 2 and wastewater management in chapter 4</li> </ul>	This policy does not ensure that areas of significance to Kai Tahu will be afforded enough protection.
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	Include a provision that the cultural values of land will be taken into account throughout this policy.	This policy has the effect of giving the protection of infrastructure precedence over any existing Kai Tahu values associated with locations.
107	Objectives on resilience, health and safety	Objective 3.6 - Energy supplies to Otago's communities are secure and sustainable	Amend	Add to description of issue that energy generation and transmission must still avoid adverse effects on environmental and cultural values.	To ensure energy supplies are managed in a way that protects environmental and cultural values.
108	Energy	Policy suite 3.6 - Energy supplies to Otago's communities are secure and sustainable	Amend	Add new policy affording particular consideration to the relationship of Kai Tahu with water resources and the potential effects on this relationship as a result of energy generation.	Of particular concern to Kai Tahu are effects on the environment and Kai Tahu values, including rivers and cultural landscape values, as a result of energy production, distribution and use.
109	Energy	Policy 3.6.1 - Using existing renewable electricity generation	Amend	Reword to: "Give preference to the use of existing	To provide for the relocation of structures and facilities that may currently be located in culturally inappropriate locations.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
		structures and facilities		structures or facilities to increase the region's renewable electricity generation capacity over developing new structures in new locations <u>unless current locations are deemed to be culturally inappropriate.</u>	
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	<ul style="list-style-type: none"> <li>• Amend policy to: "<u>c) Protect Kai Tahu values, rights and interests</u>".</li> <li>• Add Method 1— Kai Tahu relationships.</li> </ul>	Need to be clear that this policy does not advocate for electricity generation at the expense of cultural values.
118	Urban design	Schedule 6 - Urban form and design	Amend	<ul style="list-style-type: none"> <li>• In "2. A positive relationship between the community and its natural environment", add "l) <u>recognises Kai Tahu values</u>".</li> <li>• Make following amendment "4. a) Builds upon physical and cultural identity, <u>including Kai Tahu identity</u>".</li> </ul>	Kai Tahu values are often left out of urban design considerations.
131	Hazardous substances and waste	Policy 3.9.2 - Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials	Amend	Add policies to: <ul style="list-style-type: none"> <li>- Address general waste management.</li> <li>- Include specific reference to potential effects on values of importance to Kai Tahu as a result of managing/disposing residual waste, and how such effects will be considered and assessed.</li> <li>- Recognise and provide for particular tikaka issues associated with waste disposal.</li> </ul>	No reason given.
132	Hazardous substances and waste	Policy 3.9.3 - Identifying contaminated land	Amend	Add policy to: <ul style="list-style-type: none"> <li>- Require information sharing between local authorities and Kai Tahu regarding the location of contaminated sites, proposed land use changes and remediation or mitigation work.</li> <li>- Recognise that there may be specific cultural protocols, tikanga or processes associated with remediation of contaminated land that has wahi tapu, or land with other significant cultural associations.</li> </ul>	Contaminated land can have impacts on land and water and values of importance to Kai Tahu including wahi tapu.
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	Add policies to: <ul style="list-style-type: none"> <li>- Recognise that there may be specific cultural protocols, tikanga or processes associated with remediation of contaminated land that has wahi tapu, or land with other significant cultural associations.</li> <li>- Recognise the ecological value of wetlands (and specific native plant species) in resolving contamination issues.</li> </ul>	To reflect Kai Tahu interests in contaminated land and any remediation undertaken.
138	Objectives on use and enjoyment of natural and built environment	Issue 4.1 - Insufficient access to areas of value	Amend	Amend issue to acknowledge that in some cases, public access is a threat to Kai Tahu values of sensitive places.	No reason given.
139	Objectives on use and enjoyment of natural and built environment	Issue 4.2 - Risks to Otago's historic heritage	Amend	Amend issue [in Chapter overview, relating to Objective 4.2]: " <del>Sometimes, inappropriate subdivision, use, and development risk loss or degradation of damage to Otago's rich historic and cultural heritage values and landscapes.</del> "	Knowledge and understanding by some councils regarding sites of significance to Kai Tahu is lacking.
139	Objectives on use and enjoyment of natural and built environment	Issue 4.2 - Risks to Otago's historic heritage	Amend	Add additional issues relating to Objective 4.2: <ul style="list-style-type: none"> <li>• "There is a general lack of knowledge and understanding regarding sites of significance to Kai Tahu."</li> <li>• "Some sites of significance to Kai Tahu are</li> </ul>	<ul style="list-style-type: none"> <li>• Knowledge and understanding by some councils regarding sites of significance to Kai Tahu is lacking.</li> <li>• Identification of sites of significance to Kai Tahu is a sensitive and complicated issue. Listing of sites of cultural significance does not necessarily lead to protection, and may in fact lead to sites being</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				better not to be identified to ensure they are protected, and identification is a case-by-case issue."	degraded.
147	Objectives on use and enjoyment of natural and built environment	Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	Reword as follows: "Historic <u>and Kai Tahu</u> heritage resources <u>values, sites and landscapes</u> are <u>identified, recognised and protected from inappropriate use, subdivision and development and continue to contribute to the region's character and sense of identity.</u> "	<ul style="list-style-type: none"> <li>• We consider it appropriate to acknowledge Kai Tahu heritage values and landscapes within this objective alongside historic heritage.</li> <li>• To match the 'need' which is to protect the values, not just recognise them.</li> </ul>
148	Historic heritage	Policy suite 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	<ul style="list-style-type: none"> <li>• Add policies to: <ul style="list-style-type: none"> <li>- "<u>Work with Te Runanga o Ngai Tahu and the appropriate papatipu runanga to identify items, places or areas of historic heritage significance to Kai Tahu.</u>"</li> <li>- "<u>Recognise that knowledge about some historic heritage may be culturally sensitive and support protection of those areas through the maintenance of silent files held by local authorities.</u>"</li> </ul> </li> <li>• Add Method 1— Kai Tahu Relationships.</li> </ul>	<ul style="list-style-type: none"> <li>• Information regarding takata whenua heritage values, sites and places must be obtained from papatipu runaka or Te Runanga o Ngai Tahu.</li> <li>• Some historic heritage values may be culturally sensitive to Kai Tahu and provision must be made to account for this.</li> </ul>
148	Historic heritage	Policy suite 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity	Amend	<ul style="list-style-type: none"> <li>• Add policies to: <ul style="list-style-type: none"> <li>- "<u>Recognise places of historic and cultural heritage significance to Kai Tahu and protect their relationship and culture and traditions with these places from the adverse effects of inappropriate subdivision, use and development.</u>"</li> <li>- "<u>Promote protection, appropriate access or restriction of access to historic heritage items, places and areas in accordance with tikaka Maori such as the values Kai Tahu associate with those items, places and areas may be upheld.</u>"</li> </ul> </li> </ul>	No reason given.
149	Historic heritage	Policy 4.2.1 - Recognising heritage themes	Amend	<ul style="list-style-type: none"> <li>• Reword as follows: "a(b) Maori cultural and heritage values <u>identified by Kai Tahu including those identified in Schedule 1, iwi planning documents and including but not limited to mahinga kai, freshwater streams, springs and rivers, coastal environments, wahi tapu including nohoanga, historic and contemporary pa sites, wahi parekura, urupa, papakaika, taunga waka, taonga species, indigenous flora and marae.</u>"</li> <li>• Add Method 1 - Kai Tahu Relationships</li> </ul>	Reference to Maori cultural and heritage values are too vague
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	Reword as follows: "Managing historic <u>and cultural</u> heritage values. Protect and enhance the values of places and areas of historic <u>and cultural</u> heritage, by: d) Avoiding significant adverse effects on other values of areas and places of historic <u>and cultural</u> heritage; and h) Encouraging the integration of historic heritage values into new activities <u>including cultural heritage where appropriate and in consultation with Kai Tahu;</u> and	No reason given.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				i) Enabling <u>restoration</u> , adaptive reuse or upgrade of historic heritage places and areas where heritage values can be maintained."	
154	Land management for economic production	Policy suite 4.3 - Sufficient land is managed and protected for economic production	Amend	Make Issue description and explanations clearer so they relate to the policies.	Issue description is unclear, as is the explanation.
154	Land management for economic production	Policy suite 4.3 - Sufficient land is managed and protected for economic production	Amend	<ul style="list-style-type: none"> <li>• Add additional policies to: "Minimise the effects of existing pests and avoid the establishment of new pest species."</li> </ul>	The spread of existing or new pest species is a threat to the economy and indigenous species.
154	Land management for economic production	Policy suite 4.3 - Sufficient land is managed and protected for economic production	Amend	<p>Add additional policies to:</p> <ul style="list-style-type: none"> <li>- Require a precautionary approach to the consenting of water takes and the duration of such consents.</li> <li>- Set environmental limits.</li> </ul>	Mention has not been made of water takes.
154	Land management for economic production	Policy suite 4.3 - Sufficient land is managed and protected for economic production	Amend	<ul style="list-style-type: none"> <li>• Add a policy that recognises the opportunity in urban design to acknowledge the takata whenua and their enduring association with the region, which must be done in consultation with the relevant papatipu runaka.</li> <li>• Add Method 1— Kai Tahu Relationships.</li> </ul>	Kai Tahu presence can be an important component of a CBD's identity. Important that CBDs have a Kai Tahu sense of place included within their design to reflect their association.
154	Land management for economic production	Policy suite 4.3 - Sufficient land is managed and protected for economic production	Amend	Add a policy that restricts industrial activities in areas of cultural or environmental sensitivity.	To provide clear guidance that, while industrial activities are important, adverse effects on environmental and cultural values must be avoided, remedied or mitigated.
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	<ul style="list-style-type: none"> <li>• Reword as follows: "Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling <u>environmentally sustainable levels of farming</u> and other rural activities that support the rural economy; and e) Provide for other activities that have a functional need to locate in rural areas, including <u>Kai Tahu</u>, tourism and recreational activities that are of a nature and scale compatible with rural activities."</li> </ul>	Environmental sustainability should be considered within this policy when promoting farming activities.
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	<ul style="list-style-type: none"> <li>• Cross-reference this policy with environmental policies in Chapter 2 to indicate that rural activities must not degrade water quality.</li> <li>• Add Method 1.— Kai Tahu Relationships</li> <li>• Add Method 3 — Regional Plans</li> </ul>	Environmental sustainability should be considered within this policy when promoting farming activities.
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	<p>Amend policy as follows: "Recognise the needs of mineral exploration, extraction and processes activities to locate where the resource exists, and manage them by:</p> <ul style="list-style-type: none"> <li>• <del>Giving preference to</del> avoiding their location in: <ul style="list-style-type: none"> <li>• Areas of significant indigenous vegetation and significant habitats of indigenous fauna; or</li> <li>• Outstanding natural features, landscapes or seascapes; or</li> <li>• Areas of outstanding natural character; or</li> <li>• Outstanding water bodies; or</li> <li>• Areas subject to significant natural hazard risk; and or</li> <li>• <u>Areas of cultural significance to Kai Tahu or where Kai Tahu values will be adversely</u></li> </ul> </li> </ul>	The increasing pressure being placed upon both rural areas and the coastal environment from the mining and petroleum industry which could have a negative impact on environmental and cultural values.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				affected; and"	
161	Objectives on use and enjoyment of natural and built environment	Objective 4.4 - Otago's communities can make the most of the natural and built resources available for use	Amend	Amend objective to better reflect the policies which are about efficiency of use.	Policies do not match the objective.
162	Making the most of available resources	Policy suite 4.4 - Otago's communities can make the most of the natural and built resources available for use	Amend	<ul style="list-style-type: none"> <li>• Add policies to: <ul style="list-style-type: none"> <li>- Require a precautionary approach to water allocation, particularly where science and information is uncertain.</li> <li>- Apply a ki uta ki tai approach.</li> <li>- Ensure that water efficiency measures such as storage do not compromise Kai Tahu cultural values such as mahinga kai.</li> <li>- Provide greater policy guidance for how to manage water allocation such as setting minimum flows.</li> </ul> </li> </ul>	Kai Tahu supports efficiency of water allocation and use but seeks to ensure there is a framework in place that protects environmental and cultural values
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	<ul style="list-style-type: none"> <li>• Cross-reference this policy to policies relating to freshwater values and management.</li> <li>• Add Method 1— Kai Tahu Relationships.</li> </ul>	No reason given.
165	Making the most of available resources	Policy 4.4.3 - Encouraging environmental enhancement	Amend	<p>Reword as follows:  "Encourage activities which contribute to enhancing the natural environment, including to:  b) Protect or restore habitat for indigenous species <u>and mahika kai</u>; and/or  f) Improve the health and resilience of:  i. Ecosystems supporting indigenous biodiversity; and/or  ii. Important ecosystem services, including pollination; and/or  iii. <u>Mahika kai</u>; and/or,  g) Improve access to rivers, lakes, wetlands and their margins <u>and the coast (unless deemed culturally inappropriate by Kai Tahu)</u>; or"</p>	No reason given.
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Amend	<ul style="list-style-type: none"> <li>• Reword as follows:  "Avoid discharges that are objectionable or offensive to takata whenua and the wider community, including:  a) Discharges of human or animal waste:  i. Directly to <u>water freshwater, natural wetlands or coastal environments</u>; or  ii. In close proximity to water <u>environments as listed in (a)(i)</u>; or  iii. In close proximity to mahika kai <u>or sites of cultural significance to Kai Tahu</u>; or  b) Discharges of hazardous or noxious substances close to sensitive activities, including:  i. Residential activities; or  ii. Schools and other educational activities; or  iii. Places of public access to the natural environment; or  iv. In close proximity to mahika kai sites; or  v. <u>in close proximity to sites of Kai Tahu significance.</u>"</li> <li>• Add Method 1— Kai Tahu Relationships</li> </ul>	Support the intent, but with amendments as suggested to better reflect Kai Tahu values in relation to discharge of contaminants to water and address wahi tapu.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	<ul style="list-style-type: none"> <li>Amend policy as follows: "Recognise the needs of mineral exploration, extraction and processes activities to locate where the resource exists, and manage them by:</li> <li><del>Giving preference to</del> avoiding their location in: <ul style="list-style-type: none"> <li>Areas of significant indigenous vegetation and significant habitats of indigenous fauna; or</li> <li>Outstanding natural features, landscapes or seascapes or</li> <li>Areas of outstanding natural character; or</li> <li>Outstanding water bodies; or</li> <li>Areas subject to significant natural hazard risk; and/or</li> <li><u>Areas of cultural significance to Kai Tahu or where Kai Tahu values will be adversely affected; and"</u></li> </ul> </li> <li>Add Method 1 - Kai Tahu Relationships</li> </ul>	No reason given.
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Amend	<ul style="list-style-type: none"> <li>Amend policy to: <ul style="list-style-type: none"> <li>Recognise taonga species and mahinga kai</li> <li>Recognise Kai Tahu rights as kaitiaki to be involved in any discussions and decision making about offsets for biodiversity.</li> </ul> </li> <li>Add Method 1— Kai Tahu Relationships.</li> </ul>	To adequately recognise taonga species, mahinga kai or Kai Tahu rights and interests as kaitiaki of indigenous species.
175	Management of adverse effects	Policy 4.5.8 - Offsetting for indigenous biodiversity	Amend	<ul style="list-style-type: none"> <li>Amend policy as follows: "e) <u>Work with Kai Tahu to ensure takaka whenua values relating to indigenous biodiversity are protected and where possible enhanced."</u></li> <li>Add Method 1—Kai Tahu Relationships.</li> </ul>	To adequately recognise taonga species, mahinga kai or Kai Tahu rights and interests as kaitiaki of indigenous species to be involved in indecision-making about offsets.
178	Methods	Methods - general	Amend	[Clarify] where responsibility lies or where there is overlap of responsibilities (territorial authority or regional council).	It is often unclear where responsibility lies.
180	Method 1 - Kai Tahu relationships	Method 1.1 - Developing collaboration processes with Kai Tahu	Amend	<p>Amend as follows:</p> <p>"1.1.1 Establish and maintain effective resource management relationships with <u>papatipu runaka and Kai Tahu, based on a principle of partnership.</u></p> <p>1.1.2 Use and take into account Iwi Management Plans <u>and other iwi planning documents as a primary tool to:</u></p> <ul style="list-style-type: none"> <li><u>Assist in the identification of issues of resource management significance to Kai Tahu and papatipu runaka.</u></li> <li><u>Provide cultural context and understanding of values underpinning the relationship between Kai Tahu, papatipu runaka and the environment.</u></li> <li><u>Understand, acknowledge and account for the importance of local knowledge and guidance about the environment at papatipu runaka level.</u></li> <li><u>Identify statutory acknowledgements, sites of significance and importance to Kai Tahu and</u></li> </ul>	To be more specific in order to implement the policies.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><u>papatipu runaka, and understand why they are important.</u></p> <ul style="list-style-type: none"> <li>• <u>Assist in the determination of the nature and extent of consultation that may be required over particular activities or places of importance.</u></li> <li>• <u>Assist in the development of planning policy.</u></li> <li>• <u>Assist decision-makers to make an informed decision with respect to a proposal or development of policy.</u></li> </ul> <p><u>1.1.4 Involve Kai Tahu and papatipu runaka in the plan development process from inception, to ensure values are integrated and principles of the RMA and Te Tiriti o Waitangi are given effect.</u></p> <p><u>1.1.5 Provide papatipu runaka, and where appropriate, Te Runanga o Ngai Tahu with opportunities to participate in the resource consent process as appropriate by:</u></p> <p><u>a) notifying and consulting affected papatipu runaka, and where appropriate, Te Runanga o Ngai Tahu on notified resource consent applications which are site-specific, resource-specific or issues of significance to Kai Tahu as identified in iwi management plans and by papatipu runaka.</u></p> <p><u>b) ensuring contact details of the district or region's papatipu runaka are maintained, and iwi documents lodged with council by Te Runanga o Ngai Tahu are recorded for applicant use and consultation purposes.</u></p> <p><u>c) Encourage applicants to place applications on hold voluntarily to consult with runaka (where appropriate) in an effort to resolve issues at an early stage of proposals.</u></p> <p><u>1.1.6 Endeavour to appoint tangata whenua as commissioners on resource consent hearing panels and during plan development processes, particularly when making decisions on issues of resource management significance to Kai Tahu.</u></p> <p><u>1.1.7 Seek Cultural Impact Assessment or Cultural Values Assessment as part of an assessment of environmental effects under Schedule 4 of the RMA, where the application is likely to impact on a significant resource management issue for Kai Tahu."</u></p>	
181	Method 1 - Kai Tahu relationships	Method 1.2 - Collaborating with Kai Tahu for value identification	Amend	<p>Amend as follows:</p> <p><u>"1.2 Regional, city and district councils will collaborate with Kai Tahu to:</u></p> <p><u>1.2.5 Use cultural monitoring tools when monitoring the state of the environment.</u></p> <p><u>1.2.6 Continue to provide for involvement of Kai Tahu as tangata whenua in decision making processes including Kai Tahu representation on working parties, technical advisory groups or</u></p>	To be more specific in order to implement the policies.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p><u>other forums that warrant representation.</u></p> <p><u>1.2.7 Consider providing capacity for Kai Tahu (where parties consider this of mutual benefit) to be involved in studies and research to inform policy development.</u></p> <p><u>1.2.8 Encourage and support, where appropriate and when approached (on a case by case basis) the development or review of iwi management plans including the provision of technical advice, administrative support and funding options.</u></p> <p><u>1.2.9 Recognise the mana/importance and spirit of intent of statutory acknowledgements and regulations under the Ngai Tahu Claims Settlement Act 1998 (NTCSA) and make provision for their embodiment, beyond their legally recognised expiry date, throughout council policy."</u></p>	
182	Method 1 - Kai Tahu relationships	Method 1.3 - Improving knowledge of Kai Tahu's values, rights and interests	Amend	<p>Amend as follows:</p> <p>"1.3 Regional, city and district councils will:</p> <p>1.3.1 <del>Seek opportunities to a</del> Assess, improve <del>and demonstrate</del> knowledge of tikaka and the principles of Te Tiriti o Waitangi among staff and stakeholders and the community."</p>	To be more specific in order to implement the policies.
183	Method 1 - Kai Tahu relationships	Method 1.4 - Delegating functions to Kai Tahu	Amend	<p>Amend as follows:</p> <p>"1.4.1 Delegate and transfer <u>any one or more of its functions, powers or duties to the iwi authority under section 33 of the RMA plan administration functions to an iwi authority</u>, where this provides an efficient and effective service <u>or provides for greater involved of Kai Tahu in in the management of natural and physical resources. Any such transfer will be discussed and mutually agreed between the parties prior to any such transfer occurring."</u></p>	To be more specific in order to implement the policies.
184	Method 2 - Regional, City and District Council Relationships	Method 2 - Regional, City and District Council Relationships	Amend	<ul style="list-style-type: none"> <li>Method 2 should be: "Regional, City and District Council <u>and Kai Tahu</u> relationships";</li> <li>And should include the following method: "Joint or co-management of a resource(s) between a local authority and iwi authority."</li> </ul>	Kai Tahu as the Treaty Partner should be an integral part of relationships among authorities.
188	Method 3 - Regional Plans	Method 3 - Regional Plans	Amend	<p>Add additional methods:</p> <ul style="list-style-type: none"> <li>Use and implementation of IMPs.</li> <li>Address concern over 35 year consents.</li> </ul> <p>Freshwater:</p> <ul style="list-style-type: none"> <li>Beds and margins of waterways:</li> </ul> <p>Coastal water values:</p> <ul style="list-style-type: none"> <li>Recognise provisions in NZCPS for restoring natural character of [the] coastal environment.</li> <li>Advocate for and promote mechanisms and measures that protect natural character of [the] coastal environment, including Kai Tahu efforts to protect resources of the coastal environment through the use of customary management</li> </ul>	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>tools such as rahui, mataitai and taiapure.</p> <ul style="list-style-type: none"> <li>• Recognise importance of CMA Statutory Acknowledgements beyond the expiry dates as per the Ngai Tahu Claims Settlement (Resource Management Consent Notification) Regulations 1999.</li> <li>• Recognise integrated community groups who may develop community-led coastal strategies</li> <li>• Engage with Kai Tahu to identify coastal areas of significance and ways to protect Kai Tahu values in those areas. This process will be assisted by use of cultural monitoring tools, iwi management plans, and use of customary fisheries management tools.</li> </ul> <p>Natural hazards: Add specific methods for management of natural hazards</p> <p>Soils</p> <ul style="list-style-type: none"> <li>• Identify Kai Tahu cultural values in relation to soil for inclusion in regional plans, through engagement with Kai Tahu and use of iwi management plans.</li> <li>• Will ensure information sharing with Kai Tahu regarding the location of contaminated sites, proposed land use changes and remediation or mitigation work.</li> <li>• Will use cultural monitoring tools developed by Kai Tahu to monitor effectiveness of these policies.</li> <li>• Should promote land use practices that maintain and improve soil quality.</li> </ul> <p>Biodiversity</p> <ul style="list-style-type: none"> <li>• Local authorities will engage with Kai Tahu and use iwi management plans to identify areas, habitats, species and ecosystems of particular significance to Kai Tahu and to protect them in a manner consistent with Kai Tahu cultural values and principles.</li> </ul> <p>Landscapes</p> <ul style="list-style-type: none"> <li>• Set objectives, policies or methods in relevant regional and district plans to protect outstanding natural features and landscapes (including cultural landscapes) from inappropriate subdivision, use and development, and avoid, remedy or mitigate adverse effects of subdivision use and development on outstanding natural features and landscapes.</li> </ul> <p>Heritage</p> <p>Work with Te Runanga o Ngai Tahu and the appropriate papatipu runanga to:</p> <ul style="list-style-type: none"> <li>• Identify and manage significant or important</li> </ul>	

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<p>historic heritage items, places or areas.</p> <ul style="list-style-type: none"> <li>Use iwi management plans as just one of the tools to provide cultural context in the identification of historic heritage items, places and areas of significance to Kai Tahu.</li> </ul>	
192	Method 4 - City and District Plans	Method 4 - City and District Plans	Amend	<ul style="list-style-type: none"> <li>Landscapes Set objectives, policies or methods in relevant regional and district plans to protect outstanding natural features and landscapes (including cultural landscapes) from inappropriate subdivision, use and development, and avoid, remedy or mitigate adverse effects of subdivision use and development on outstanding natural features and landscapes.</li> <li>Heritage Provide guidance on how 4.2.1 will be implemented.</li> <li>Papakaiaka Amend district plans to implement policies relating to papakaika.</li> </ul>	No reason given.
197	Method 6 - Research, Monitoring and Reporting	Method 6 - Research, Monitoring and Reporting	Amend	Add additional method: "Work with Kai Tahu to use cultural monitoring tools when undertaking state of the environment monitoring."	No reason given
210	Method 8 - Education and Information	Method 8 - Education and Information	Amend	Add specific detail in Method 8 to: <ul style="list-style-type: none"> <li>Promote awareness and understanding of Treaty obligations.</li> <li>Share information relevant to Kai Tahu interests.</li> </ul>	No reason given.
215	Method 9 - Funding	Method 9 - Funding	Amend	<ul style="list-style-type: none"> <li>Add specific detail in Method 9 to: Requiring local authorities to provide funding to enable them to fulfil their responsibilities under Policies 1.1.1 and 1.1.2.</li> </ul>	No reason given.
230	Anticipated Environmental Results	AER 2.2 - Otago's water bodies support healthy ecosystems, are safe for swimming, and maintain their natural form and character	Amend	<ul style="list-style-type: none"> <li>Change title of AER 2.2 to read: "Otago's water bodies support healthy ecosystems, are safe for <u>mahinga kai gathering swimming</u>, and maintain their natural form and character."</li> <li>Amend indicators as follows: "Rivers, <u>lakes, wetlands, lagoons/hapua</u> maintain natural character and form. Otago's water bodies are safe for <u>swimming mahinga kai gathering</u>."</li> </ul>	In areas of importance to Kai Tahu, water quality should be of a mahinga kai gathering standard (not just a swimming standard).
231	Anticipated Environmental Results	AER 2.3 - The quality of Otago's coastal environment is maintained or enhanced	Amend	Add indicators as follows: <ul style="list-style-type: none"> <li>Maintenance and enhancement of Kai Tahu access to mahika kai, wahi tapu and wahi taonga and other sites of cultural significance in the coastal environment will have occurred.</li> <li>The quality of coastal water in areas valued by Kai Tahu for mahika kai is maintained (i.e. shellfish gathering standard)</li> <li>The natural, cultural, amenity and recreational values of coastal water will be protected from discharges of contaminants that could affect such values</li> </ul>	Indicators as currently drafted do not: <ul style="list-style-type: none"> <li>measure protection of Kai Tahu values, rights and interests in relation to the coast.</li> <li>only measure water quality for swimming (not mahika kai or ecological health).</li> <li>measure protection of natural, cultural, recreational, amenity values.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Adverse effects arising from occupation, use and development of the coastal environment have been avoided, remedied or mitigated.</li> <li>• The natural, amenity, recreational, cultural, landscape and historic heritage values of the coastal environment will be maintained and enhanced.</li> <li>• Improved understanding of the coastal environment.</li> </ul> <p>Measuring indicators</p> <ul style="list-style-type: none"> <li>• Use of cultural monitoring tools developed by Kai Tahu.</li> </ul>	
232	Anticipated Environmental Results	AER 2.4 - The quality of Otago's soils is maintained or enhanced	Amend	<p>Add/amend indicators</p> <ul style="list-style-type: none"> <li>• <u>"The quality, life-supporting capacity and mauri of Otago's soils and their health and capability of providing for the social, cultural, environmental, and economic wellbeing of Otago's people and communities will be maintained or improved the health and quantity of Otago's highly-valued soils are maintained or enhanced.</u></li> <li>• <u>Significant induced soil erosion, nutrient and sediment loss is avoided or reduced."</u></li> </ul>	<ul style="list-style-type: none"> <li>• Indicators need to more clearly articulate the need to maintain and protect soils for cultural use and cultural wellbeing.</li> <li>• Need a specific indicator regarding erosion.</li> </ul>
233	Anticipated Environmental Results	AER 2.5 - The health and diversity of Otago's ecosystems is maintained or enhanced	Amend	<p>Add/amend indicators:</p> <ul style="list-style-type: none"> <li>• <u>There are more areas of significant indigenous vegetation and significant habitats of indigenous fauna that are identified and protected.</u></li> <li>• <u>There is an increase in the number and effectiveness of biodiversity-related initiatives in Otago that contribute to the protection and enhancement of indigenous biodiversity and to safeguarding the life-supporting capacity and mauri of ecosystems generally.</u></li> <li>• <u>The relationship of Kai Tahu with their sites, species, and habitats of cultural significance is enhanced.</u></li> <li>• <u>There is no further loss of the area, diversity or functioning of ecologically significant wetlands in Otago."</u></li> </ul>	No reason given.
248	Appendices	Appendices - general	Amend	<p>Make following amendments to [Statutory framework]:</p> <ul style="list-style-type: none"> <li>• "It must also take into account any <u>iwi</u> planning document."</li> <li>• <u>Add iwi management plans to diagram.</u></li> </ul>	Words missing.
249	Glossaries	Glossary	Amend	<p>Change the definition of "Native Reserve" as follows: "Native Reserve: Any property or site that is a: Native Reserve excluded from the Otakou Land purchases (1848) (1844)"</p>	Correction.
249	Glossaries	Glossary	Amend	<p>Need definition of water body added to Definitions.</p>	No reason given.
249	Glossaries	Glossary	Amend	<p>A definition of cultural landscapes is required so everyone knows what it includes.</p>	Cultural landscapes are important for Kai Tahu and all New Zealanders.
250	Glossaries	Glossary of Te Reo terms	Amend	<p>Make following amendments:</p>	Reflects RMA; correction for local dialect.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<ul style="list-style-type: none"> <li>• Mana Whenua: "Customary authority or rakatirataka exercised by an iwi or hapu within this rohe in an identified area."</li> <li>• Marae: add a macron to the a in "urupa"</li> <li>• Topuni: "rangatira rakatira rangatiratanga rakatirataka".</li> </ul>	
253	Other comments	Structure of the document & useability - general	Amend	Cross references would assist plan users to navigate through the document.	The layout of the document is difficult to navigate. A plan user needs to read the entire document rather than just one relevant chapter to understand how a particular resource must be managed. Due to the layout / structure of the document, there are objectives and policies that impact on the management of a particular resource located throughout the document.
253	Other comments	Structure of the document & useability - general	Amend	The frontispiece to the chapter is unreferenced. If this image is 'Tamatea' from Otakou' Marae it requires a reference.	The use of a generic image as the frontispiece to the Kai Tahu chapter is not supported.
255	Other comments	Introduction - Overview and the Otago Region	Amend	Amend 3rd paragraph as follows: "Human activity has left its mark on the landscape, including Maori archaeological sites and wahi tupuna, hydro lakes, tailings and bridges from the gold rush era, pastoral landscapes, and historical architecture."	Kai Tahu, Kati Mamoe and Waitaha imprint on the landscape is broader than archaeological sites and encompasses the full range of Wahi Tupuna from kaika to nga tuhituhi o nehera (rock art). This imprint reflects the region's pre-European history.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	Make following amendment to the Chairman's foreword: "The Treaty partnership between the Crown- Otago Regional Council and Kai Tahu is a vital part of this collaborative effort."	In the Chairman's foreword: The Otago Regional Council is the Crown's representative in the Treaty Partnership with Kai Tahu.
256	Other comments	Miscellaneous (e.g. unnecessary sections etc.)	Amend	<ul style="list-style-type: none"> <li>• Add macrons to Runanga</li> <li>• Wahi kohatu — add macron on the "o"</li> <li>• Wai Maori — no macron on "wai"</li> <li>• Macron on "Maori"</li> </ul>	• Correction.
258	Other comments	Consequential amendments & other amendments providing relief	Amend	Seek any consequential amendments necessary to give effect to the decisions sought	As described in relevant submissions.
260	Chapter B1 - Kai Tahu values	Outcome 1 and introduction	Amend	Change the outcome to: "Kai Tahu values, rights and interests are <u>protected upheld and the expression of</u> kaitiakitaka is expressed enabled."	This key Kai Tahu "Pillar" needs to be actively worded.
260	Chapter B1 - Kai Tahu values	Outcome 1 and introduction	Amend	Amend the introduction to Outcome 1 as follows: " <u>The availability of Having good resources high quality natural resources and ecosystem services</u> enables Kai Tahu to engage with the natural environment, and develop and use resources for their cultural wellbeing and economic benefit."	The ability of Kai Tahu to provide for the cultural and economic wellbeing is dependent on access to high quality natural resources and ecosystem services.
260	Chapter B1 - Kai Tahu values	Outcome 1 and introduction	Amend	Amend as follows: "Kaitiakitaka is an expression of <u>mana rakatirataka</u> and the means by which the mauri (life supporting capacity) of taoka ..."	To capture the nature of Kaitiakitaka.
263	Objectives on Kai Tahu values	Introduction to Objective 1.1	Amend	Reword as follows: "However, as the principles are <u>not codified broadly expressed</u> , an amount of flexibility is also needed."	Remove references to 'codifying' and focus on the opportunities that a true Treaty partnership offers.
273	Objectives on resilience, health and safety	Need 3.1	Amend	Amend issue to reflect that we need to take environmental constraints into account not just for resilience, but for the intrinsic values of environmental resources and cultural, social,	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				environmental and economic wellbeing.	
283	Objectives on resilience, health and safety	Introduction to Objective 3.2	Amend	Add to description in objective that " <u>Natural hazards and natural hazard mitigation may result in the loss of, or adverse effects on, values of importance to Kai Tahu</u> ".	Description of issue under Objective heading does not acknowledge potential effects on cultural values.
286	Objectives on resilience, health and safety	Introduction to Objective 3.5	Amend	Reword the explanation as follows: "Infrastructure of national and regional significance, including roads, rail, electricity generation and transmission, and telecommunication, are part of a national network, and contribute to the economic and social wellbeing of the nation." " <u>Whilst these aspects are important, we must also ensure that environmental and cultural values are protected from the adverse effects that can arise from infrastructure development.</u> "	It is important that cultural and environmental values are protected from adverse effects arising from infrastructure development.
288	Objectives on resilience, health and safety	Introduction to Objective 3.7	Amend	Add reference to Kai Tahu heritage as part of the distinctive character of Otago.	To see urban areas reflect Kai Tahu cultural heritage — this should be integrated into the urban environment.
291	Chapter B4 - Use and enjoyment of natural and built environment	Outcome 4 and introduction	Amend	Reword explanation [in Chapter overview] as follows: "The use of natural and physical resources underpins <u>community, cultural and</u> economic activity in Otago. However due to the dynamic and highly interconnected nature of the environment the sustainable management of our resources requires consideration of the adverse effects of resource use on the environment and on other resource users."	No reason given.
292	Objectives on use and enjoyment of natural and built environment	Need 4.1	Amend	Amend 'Need' [in Chapter overview, relating to Objective 4.1] to include: • Provide for Kai Tahu access to their sites of significance. • Protect all sites of significance including those not registered as NZ HPT or NZAA sites. • Finding opportunities to improve access (or limiting access where appropriate).	Concern that description of 'need' implies that public access can only be improved through subdivision or development.
293	Objectives on use and enjoyment of natural and built environment	Need 4.2	Amend	Amend 'Need' in Chapter overview, relating to Objective 4.2: " <u>Recognise and</u> Protect of historic and Kai Tahu heritage sites, values and landscapes from inappropriate activities <u>is required under the RMA as a matter of national importance. Improve knowledge and understanding of sites of significance to Kai Tahu.</u> "	<ul style="list-style-type: none"> <li>• Knowledge and understanding by some councils regarding sites of significance to Kai Tahu is lacking.</li> <li>• No need to re-state the RMA requirements.</li> </ul>
295	Objectives on use and enjoyment of natural and built environment	Need 4.4	Amend	Reword Need [in Chapter overview, relating to Objective 4.4] as follows: "We need efficient allocation and use of these resources to maximise socio-economic and cultural benefits, as well as sustain <u>cultural and environmental wellbeing.</u> "	Cultural wellbeing is as important as the environmental wellbeing of the environment.
298	Objectives on use and enjoyment of natural and built environment	Introduction to Objective 4.2	Amend	Amend explanation relating to Objective 4.2: "Otago is a province rich in <u>cultural and</u> historic heritage, and includes heritage places, areas <u>and landscapes</u> that are recognised as nationally, regionally and locally important.	To acknowledge cultural heritage including cultural landscapes.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				Our historic heritage resources places, areas and landscapes <u>and the cultures they represent</u> contribute to our regional identity and tourism economy. <u>The cumulative loss of these heritage places, areas and landscapes and their values can diminish that sense of identity.</u> "	
299	Objectives on use and enjoyment of natural and built environment	Introduction to Objective 4.3	Amend	Include wording in explanation [relating to Objective 4.3] that economic gain will not be at the expense of environmental and Kai Tahu cultural values.	We consider it appropriate that environmental priorities are represented in this objective to balance out the economic focus.

### 155 Otago Conservation Board

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
1	Overall approach	Whole Regional Policy Statement (general support)	Support	Submitter specifically encourages the implementation of the [PRPS] to consider and maintain three core outcomes: a. Enabling public access to and through the natural environment; b. Providing clear, consistent, and equal access rights to [resources] and opportunities; and, c. Creating a bureaucratic structure that creates environmental flexibility over time.	The document does well in providing: • a close companion to the Board's coming Conservation Management Strategy where both consider the broad connections between environmental stability and social development; • a visionary tone and necessary structure to ensure all aspects - cultural, social, ecological, environmental, and interpersonal - improve and are safeguarded; • for enabling and encouraging people and organisations to take responsibility for the role not they do play, but that they can and should play in the development of the region, and in creating a long-term sustainable format for growth and enterprise. • It is a reassuring foundation for submitter and ORC to work proactively on conservation matters.
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Make item "d)" of the PRPS stronger and more clearly applied, by giving emphasis to species and their habitats.	In protection of migration, the species and particular habitats need mentioning.
32	Natural resource value management - general	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Amend	Indicate that no preference for any specific land use is guaranteed a higher priority than another, given environmental outcomes can be determined and guaranteed to an equal level.	Although other areas of the PRPS specifically address particular land use interests, it would seem appropriate to indicate this preference here.
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	[Make item c) of the PRPS] stronger and more clearly applied, [by giving] emphasis to species and their habitats.	In protection of migration, the species and particular habitats need mentioning.
47	Highly valued natural resources - landscapes & natural features	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend	[Address] the potential relationship between the Policy and [Conservation Management Strategy].	To strengthen the scope of the PRPS.
59	Natural systems and interdependencies	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Amend	[Clarify] safeguarding farm activities.	Though specific mention is made of farming in later sections of the PRPS, in order to ensure consistency, and avoid potential internal document conflict, it may make sense to make some explicit statement here.
77	Recognition of environmental constraints	Policy suite 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints	Amend	• [Acknowledge] that not all constraints are permanent, nor are all constraints known. • [Express] the potential for constraints to have positive impacts in forcing development, driving research.	• Maintain flexibility to provide scope for movement in this area as some constraints fall away as others rise. • To provide clear foresight and further establish the enabling and proactive tone of the PRPS.
137	Chapter B4 - Use and enjoyment of natural and built environment	Chapter B4 - general requests	Support	Submitter supports tone of the PRPS, demonstrated in 4.3.1 and 4.4.	To encourage people to make use of their resources, PRPS envisions an environment unencumbered by strict bureaucratic controls, people taking responsibility and ownership, and controls designed to foster, not deviate from, this general sense of public engagement and control.
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	[Explicitly express] that the [PRPS] is not creating a hierarchy of rights, but instead acts	No reason given.

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				as a levelling mechanism by which those with competing interests have equal claim to the available resources within a framework of environmental sustainability and enhancement.	
165	Making the most of available resources	Policy 4.4.3 - Encouraging environmental enhancement	Did not specify	[Policy illustrates] where and how a closer working relationship between the Board and the ORC could increase the likelihood [that] sustainable environmental outcomes can be both identified and achieved.	A sustained, encouraging dialogue with all environmental stakeholders and actors could be the result of the PRPS, with an improved sense of community ownership.
174	Management of adverse effects	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	Did not specify	[Policy illustrates] where and how a closer working relationship between the Board and the ORC could increase the likelihood [that] sustainable environmental outcomes can be both identified and achieved.	For greater consideration of existing assets that exist to result in long-term intergenerational and organisationally neutral natural security.
197	Method 6 - Research, Monitoring and Reporting	Method 6 - Research, Monitoring and Reporting	Support	Applaud the focus on research and scientific support for activities.	No reason given.
251	Other comments	Implementation	Did not specify	This document should be treated as the start of a joint conversation between the ORC structure and community intent.	Proof of the document will be in the application - a sustained, encouraging dialogue with all environmental stakeholders and actors.

### 156 Dunedin City Council

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	Enabling policies should be able to override more specific avoidance policies.	It may be difficult to give full effect to the RPS if the term "avoid" is used in the context of enabling policies. Submitter acknowledges that the term "avoid" is effective where it relates to a policy supporting the prohibition of an activity.
3	Overall approach	Whole Regional Policy Statement (overall approach)	Amend	For each policy, reference the specific part(s) of the method applicable, rather than the whole method.	To improve clarity where sections have numerous provisions, identify which method is considered to give effect to a policy. It can be unclear which method gives effect to a specific policy, so link back to the policies by stating e.g. "Regional Council will implement Policies X and Y".
4	Overall approach	Introduction - RPS framework	Amend	<p>Amend text as follows:</p> <p>Otago has high quality natural resources and ecosystems.</p> <p><del>Society relies heavily on the systems and services of The natural environment provides a sense of place and wellbeing, and in turn the quality of our environment affects our quality of life. Otago has a unique natural environment.</del></p> <p>[describe what makes Otago unique here].</p> <p>This chapter addresses our fundamental reliance on natural resources and ecosystem services to sustain us, our way of life, cultural identity and our economy. Agriculture and tourism, Otago's biggest earners, both rely on having a great environment. The chapter deals with <u>maintaining and enhancing the intrinsic values of the natural</u> resources that are most important to us, and the inherent qualities of the natural environment that give it value beyond human use.</p> <p>People are able to use and enjoy our natural and built environment.</p> <p>Our individual and community wellbeing is built</p>	<ul style="list-style-type: none"> <li>• The outcome "Otago has high quality natural resources and ecosystems" appears to be about intrinsic value of the natural environment for enjoyment or a sense of place. This is not clearly reflected in the text which promotes use or consumption (i.e. agriculture and tourism).</li> <li>• Use of the environment appears to be the purpose of the fourth outcome. It is suggested that the second outcome should therefore distinctly reflect natural/intrinsic values.</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				<del>not only on our natural environment, but</del> on use and development of <del>its</del> resources. This fourth chapter builds on the previous ones by enabling people to use the natural and physical environment for enjoyment and making a living, while ensuring that resources are sustained. It also deals with managing conflicting or incompatible uses, hazardous substances and waste.	
5	Overall approach	Introduction - The Treaty Partner	Amend	Amend first bullet point on page 7 as follows: Recognising the rights and interests of Kai Tahu to be involved in <del>natural and</del> resource management in Otago, <del>including decision-making processes and implementation.</del>	To accurately reflect Kai Tahu rights in terms of consultation, and under the Treaty of Waitangi.
14	Principles of Te Tiriti of Waitangi	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account	Amend	Delete Policy 1.1.2 (b) and (f)(iii).	<ul style="list-style-type: none"> <li>• The explanation to the objective states "In particular, exercising kaitiakitaka requires the ability to participate in decision-making and implementation. A partnership approach, ...elevates their... rights... in the decision-making process". This is repeated in Policy 1.1.2(b).</li> <li>• This statement is not given any particular effect, other than stating "Councils may delegate and transfer RMA plan administration functions to an iwi authority".</li> <li>• Kai Tahu do not need to be involved in resource management decision-making or implementation processes. Statutory acknowledgements only require local authorities to put them on their plans, and treat Ngai Tahu as affected parties.</li> </ul>
21	Kai Tahu values, rights, interests and customary resources	Policy 1.2.4 - Enabling Kai Tahu relationships with wahi tupuna and associated sites	Amend	Delete Policy 1.2.4 a).	Councils are unable to facilitate Kai Tahu access to sites of cultural significance through the District Plan.
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	Amend [Chapter 2] to better clarify the differences (between) "Part B Chapter 2 [and Chapter] 4 People are able to use and enjoy Otago's natural and built environment".	<ul style="list-style-type: none"> <li>• Chapter 2's outcome is about intrinsic value of the natural environment for enjoyment or a sense of place. This is not clearly reflected in explanatory text which then promotes use or consumption, which would fit better in Chapter 4.</li> <li>• The content of the chapter is a key driver for the overall content of regional and district plans under RMA Part 2 and ss30 and 31 (functions of regional and district councils).</li> <li>• Intrinsic values of the environment seem to appear in Chapter 4?</li> </ul>
24	Chapter B2 - High quality natural resources	Chapter B2 - general requests	Amend	Ensure ecosystems and habitats are appropriately addressed in Objectives 2.1 - 2.3.	To clarify that "natural resources " and "natural "systems" in Objectives 2.1, 2.2 and 2.3 include ecosystems and habitats as whole entities, or just their constituent "resources." Submitter considers that there could potentially be a risk in managing for constituent parts of ecosystems rather than managing for the whole system.
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Consider how these polices add value to existing RMA requirements.	These policies add little to the requirements of Part 2 of the RMA, and the functions of Councils under sections 30 and 31.
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend	Amend as follows: <del>"avoid the adverse effects of pest species, prevent their introduction and reduce their spread</del> Manage activities to reduce the risk of <u>introduction, the spread, or the effects, of pest species.</u> "	<ul style="list-style-type: none"> <li>• With regard to "Avoid the adverse effects of pest species..." in each policy, many pest species are already established, therefore their adverse effects cannot be avoided. Whem "avoiding", boundaries describing when and how the policy applies must be provided.</li> <li>• To clarify how avoidance will be given effect to by methods, given in section 2.2, the wording is "controlling the adverse effects of pest species".</li> </ul>
30	Natural resource value management - general	Policy suite 2.1 - The values of natural resources are recognised, maintained or	Amend	Clearly identify in the methods exactly how each aspect of each policy will be given effect to.	Not all of the policies are clearly articulated in the methods e.g. how will 2.1.1(p) "maintain the ability of existing infrastructure to operate within their design parameters" be given effect to?

Ref	Issue	Provision enhanced	Position	Decision Requested	Reason for Decision Requested
31	Natural resource value management - general	Policy 2.1.1 - Managing for freshwater values	Amend	Clarify in the policy or explanation, what provision (p) means, and if it relates to RMA sections 124A-C, or if it is an allocation of a resource under RMA section 30(1)(fa).	To clarify what this means, and how it will be given effect. It may mean that for activities like water takes, the river will be managed to ensure all existing users with infrastructure maintain their ability to continue operations and, if so, is this intended to override sections 124A-124C of the RMA, or allocate a resource?
33	Natural resource value management - general	Policy 2.1.3 - Managing for coastal water values	Amend	<ul style="list-style-type: none"> <li>• Include the following provision: "Mitigate the adverse effects of natural hazards, including flooding and erosion."</li> <li>• Provide a clearer link with Policy 2.1.8.</li> </ul>	<ul style="list-style-type: none"> <li>• To recognise that natural hazards are a relevant management concern for coastal water, and to be consistent with the equivalent freshwater policy 2.1.1.</li> <li>• Natural character appears to be missing from this policy: Possibly because it is addressed by a different policy.</li> </ul>
34	Natural resource value management - general	Policy 2.1.4 - Managing for air quality values	Amend	Amend Policy 2.1.4 to recognise the primary value recognised is human health.	There is potential for the values listed in (b) and (c) to conflict with the values expressed in (a). It is suggested that in managing activities that discharge to air, the primary value recognised should be maintaining ambient air quality that supports human health.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Reword (i) to reflect requirements of Heritage NZ Pouhere Taonga Act 2014 which require an archaeological authority where archaeological sites may be disturbed.	For (i), clarification is sought of the intent behind "maintain the soil mantle where it acts as a repository of heritage objects". As worded this suggests there can be no ground disturbance in areas where there are archaeological remains, inconsistent with this Act, where sites may be disturbed if an archaeological authority is granted.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Amend (k) as follows "Avoid <del>Minimise the adverse effects of existing contamination of soil;</del> and Avoid, where practicable, significant new soil contamination occurring."	Existing contaminated soils should be managed in accordance with the NES for Assessing and Managing Contaminants in Soil to Protect Human Health. Creation of new contaminated soils cannot always be avoided e.g. landfill sites, tailings dams, silt ponds and silage pits, so these activities should be acknowledged and managed appropriately.
35	Natural resource value management - general	Policy 2.1.5 - Managing for soil values	Amend	Clearly identify in the methods how each of the provisions in this policy will be given effect to, including through Regional Plans.	Soil conservation is a function of Regional Councils under s30(1)(c)(i) of the RMA. The methods to give effect to this policy do not include Regional Plans.
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Review and clarify the difference between use of the terms "indigenous biological diversity" and "biodiversity", and to ensure they are used deliberately and consistently..	The RMA refers to "biological diversity", and this includes living organisms, species and ecosystems. This is the term also referred to in Part C roles and responsibilities. Elsewhere "biodiversity" is addressed. Subtle differences in wording are often interpreted as significant and meaningful.
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Amend (c) to clarify what is meant by buffering of existing ecosystems.	No reason given.
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Clearly identify in the methods how each of the provisions in this policy will be given effect to.	<ul style="list-style-type: none"> <li>• Currently biodiversity is only provided for in the following methods: ORC research and identification; pest management strategy; and ORC providing public information and facilitating riparian planting.</li> <li>• A regional biodiversity strategy will be of benefit.</li> </ul>
36	Natural resource value management - general	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Amend	Add a new provision — "improve ecosystem and indigenous biodiversity values."	Many habitats, ecosystems and biodiversity in Dunedin, have become arguably degraded to the point that if we are to reverse the decline, we need to manage areas that are no longer functioning ecosystems, or lack indigenous biodiversity. This section seems to apply to managing only areas already functioning as ecosystems.
41	Highly valued natural resources	Policy suite 2.2 - Otago's significant and highly valued natural resources	Amend	Consider combining Policies 2.2.6 and 2.2.4.	Policies 2.2.6 and 2.2.4 (a) — (f) are identical, and could be simplified and streamlined by combining into a single policy
46	Highly valued natural resources - landscapes & natural features	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Amend	<ul style="list-style-type: none"> <li>• Amend by removing (d) and (e).</li> <li>• Alternatively, make this policy consistent with related policies and clearly identify in the methods how each of the provisions in this policy will be given effect to.</li> </ul>	<ul style="list-style-type: none"> <li>• To clarify why (d) "recognising and providing for positive contributions of existing introduced species" is relevant, and why it needs to be specified further to the assessment criteria set out in Schedule 4.</li> <li>• To clarify why (e) "controlling the adverse effects of pest species..." is specified in these areas, and not areas of significant indigenous vegetation and habitat as covered by Policy 2.2.2, or other areas in</li> </ul>

Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
					general. The delivery of (e) in the methods is unclear.
48	Highly valued natural resources - landscapes & natural features	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend	<ul style="list-style-type: none"> <li>Amend by removing (d) and (e).</li> <li>Alternatively, make this policy consistent with related policies and clearly identify in the methods how each of the provisions in this policy will be given effect to.</li> </ul>	<ul style="list-style-type: none"> <li>To clarify why (d) "recognising and providing for positive contributions of existing introduced species" is relevant, and why it needs to be specified further to the assessment criteria set out in Schedule 4.</li> <li>To clarify why (e) "controlling the adverse effects of pest species..." is specified in these areas, and not areas of significant indigenous vegetation and habitat as covered by Policy 2.2.2, or other areas in general. The delivery of (e) in the methods is unclear.</li> </ul>
51	Highly valued natural resources - the coastal environment	Policy 2.2.9 - Managing the natural character of the coastal environment	Amend	Amend by removing (e).	It is unclear why (e) "recognising and providing for the contribution of existing introduced species..." is relevant, and why it needs to be specified further to the attributes set out in Policy 2.1.8.
57	Highly valued natural resources - soil resources	Policy 2.2.15 - Managing highly valued soil resources	Amend	Delete (d).	Urban development may result in the loss of some highly valued soil resources, but this policy is about how those areas will be protected. It is suggested that (d) is not a protection. The matter is otherwise addressed in Policy 3.8.3(b).
65	Chapter B3 - Resilience, health and safety	Chapter B3 - general requests	Amend	<p>Include new waste management objective (related to Issue 3.9 and Objective 3.9) as follows:</p> <p>"Minimise the volumes of waste generated and requiring disposal, and provide for the effective and efficient management of waste, while avoiding, remedying or mitigating adverse effects."</p>	<ul style="list-style-type: none"> <li>The objective as drafted is that waste doesn't harm human health or the environment. It is suggested that this objective should be waste minimisation in the first instance, followed by effective and efficient management.</li> <li>The changes requested would result in the RPS having better consistency with the NZ Waste Strategy 2010 and the Waste Minimisation Act 2008.</li> </ul>
69	Objectives on resilience, health and safety	Issue 3.4 - Importance of adequate infrastructure	Amend	<ul style="list-style-type: none"> <li>Remove the issue.</li> <li>In the event the issue is retained, amend as follows: <del>Aging and sub-standard</del> <u>Inappropriate</u> infrastructure risks creating safety, health and access problems, and as a consequence, threatens community resilience</li> </ul>	<ul style="list-style-type: none"> <li>As drafted, the issue does not appear regionally significant. Regionally and nationally significant infrastructure is otherwise addressed in section 3.5.</li> <li>Clarify if infrastructure is appropriate for its purpose. Being aged or sub-standard is only one aspect, which also includes the quality of construction, capacity, and performance against current environmental standards. Other aspects are affordability, and the effects of changing climate and population. These matters are better addressed elsewhere, such as city and district plans.</li> <li>Land development is not always well integrated with infrastructure, which is addressed in part by objective/issue 3.8.</li> </ul>
74	Objectives on resilience, health and safety	Issue 3.9 - Waste and hazardous substances	Amend	<p>Include new waste management issue [related to Objective 3.9] as follows:</p> <p>"Generation of waste and inappropriate waste management contributes to unsustainable use of natural and physical resources, and can result in adverse effects on the environment, human health and the economy.</p> <p>Waste is a growing by-product of modern society, as the rate of product purchase and disposal accelerates. Its unchecked generation and disposal comes at both a financial and environmental cost; increasingly reduction and diversion is occurring. Where disposal is necessary environmental and industry best practice assist in minimising environment impact."</p>	<ul style="list-style-type: none"> <li>As drafted, the issue is waste has an adverse environmental effect. It is suggested that the whole issue, is the unsustainable generation of products, which later become waste, and inappropriate management of that waste.</li> <li>The changes requested would result in the RPS having better consistency with the NZ Waste Strategy 2010 and the Waste Minimisation Act 2008.</li> </ul>
81	Natural hazard risk	Policy 3.2.1 - Identifying natural hazards	Amend	Amend policy to clarify which natural hazards require identification, what scale, what frequency/likelihood of an event, and by whom.	To provide a consistent approach throughout the region, and clarify natural hazard identification responsibilities between the Regional, City and District Councils.

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85	Natural hazard risk	Policy 3.2.5 - Assessing activities for natural hazard risk	Amend	Amend policy as follows: "Assess the <u>vulnerability</u> of activities to for natural hazard risk,..."	To provide better clarity.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Amend policy as follows: "Avoiding <u>Managing</u> increased natural hazard risk" and "Avoid <u>Manage</u> increasing natural hazard risk..."	It is not achievable or realistic to avoid (prohibit) all new development or intensification in any area with any level of risk from natural hazards.
86	Natural hazard risk	Policy 3.2.6 - Avoiding increased natural hazard risk	Amend	Add a third bullet point under (b) as follows: "iii. <u>Mitigation of risk.</u> "	Ideally in increased risk areas, designs that mitigate the vulnerability of activities from natural hazard risk e.g. minimum floor levels and flood-aware designs, should be enabled.
87	Natural hazard risk	Policy 3.2.7 - Reducing existing natural hazard risk	Amend	Add a third bullet point to (d) as follows: "iii. <u>Mitigation of risk.</u> "	Ideally in increased risk areas, designs that mitigate the vulnerability of activities from natural hazard risk e.g. minimum floor levels and flood-aware designs, should be enabled.
88	Natural hazard risk	Policy 3.2.8 - Applying a precautionary approach	Support	Retain this policy.	No reason given.
91	Natural hazard risk	Policy 3.2.11 - Locating hard mitigation measures	Support	Retain this policy.	No reason given.
92	Objectives on resilience, health and safety	Objective 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Amend	Amend objective to add reference to the fact that Otago's contribution to reducing global greenhouse gas emissions will help mitigate the effects of climate change, thus making it easier for Otago to be prepared for and able to adapt.	Reducing global greenhouse gas emissions will reduce the extent of climate change and the extent to which adaptation is required. This will require action at all levels, including regional.
93	Climate change	Policy suite 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Amend	[Add to both policies] a new provision as follows: Promoting a reduction in Otago's greenhouse gas emissions to help reduce climate change.	Adaptation and mitigation are not mutually exclusive. Ideally the policy should require both, as mitigation will help reduce the extent of adaptation required. However, there may be communities that are unable to adapt to, or mitigate, the effects of sea level rise.
93	Climate change	Policy suite 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change	Amend	Merge Policies 3.3.1 and 3.3.2.	The reason to have a separate policy for sea level rise is not apparent. It is suggested that The policies could be simplified and streamlined through merging.
94	Climate change	Policy 3.3.1 - Adapting to, or mitigating the effects of, sea level rise	Amend	[Amend (a) and] (b): <u>Planning for the effects of sea level rise of at least 1 metre by 2115 relative to 1990 mean sea level rise</u> (Otago Metric Datum) and <u>Adding an additional 10 mm per year beyond 2115 or, if available and appropriate, the most recent national or regional guidance on likely sea level rise;</u>	No reason given.
96	Objectives on resilience, health and safety	Objective 3.4 - Good quality infrastructure and services meet community needs	Amend	<ul style="list-style-type: none"> <li>Remove the objective.</li> <li>In the event the objective is retained, clarify what is meant by "services" in the issue, and whether this includes "lifeline utilities" and /or "hazard mitigation measures".</li> </ul>	<ul style="list-style-type: none"> <li>To clarify what "services" are being referred to. Services are not included in the issue, and emergency services are referred to in the need. For Councils, core services are defined in the LGA. "Services" may be essential and emergency services, hazard mitigation measures and lifeline utilities, which are introduced in Policies 3.4.3 and 3.4.4.</li> <li>To clarify the intent.</li> </ul>
97	Infrastructure - general	Policy suite 3.4 - Good quality infrastructure and services meet community needs	Amend	In the event Objective 3.4 and Policies 3.5.3, 3.6.1 and 3.6.3 are retained, include an equivalent policy that: <ul style="list-style-type: none"> <li>Prioritises the use of water for community supplies.</li> <li>Protects public local water supply infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>Policy 3.5.3 provides protection to infrastructure of national or regional significance, while Objective 3.6 and Policies 3.6.1 and 3.6.3 seek to give preference to and protect the security of energy supplies.</li> <li>If preferences are to be given around the allocation and use of water, it is suggested that community supplies should also be prioritised.</li> </ul>
97	Infrastructure - general	Policy suite 3.4 - Good quality infrastructure and services meet community needs	Amend	In the event Objective 3.4 and Policies 3.6.4 and 3.6.5 are retained, include a policy to enable and protect good quality water supply	Policies 3.6.4 and 3.6.5 enable and protect electricity transmission and distribution infrastructure. A similar policy is sought for water supply and drainage infrastructure.



Ref	Issue	Provision	Position	Decision Requested	Reason for Decision Requested
				and drainage infrastructure.	
98	Infrastructure - general	Policy 3.4.1 - Integrating infrastructure with land use	Amend	<ul style="list-style-type: none"> <li>• Move this policy to section 3.8.</li> <li>• Clarify what "functional needs" are, and widen (a) to apply to all public infrastructure.</li> <li>• Amend (b) to recognise that public infrastructure must also be efficient, and effective and affordable.</li> <li>• Merge (c) into 3.8.1 (b) and change wording to: "Prioritise areas that have sufficient infrastructure capacity or where infrastructure can be upgraded or extended with the least possible long term cost burden to ratepayers."</li> <li>• Provide a clear description in the methods of how each of the provisions in this policy will be given effect to.</li> </ul>	<ul style="list-style-type: none"> <li>• Inappropriate design, location and function of development can prevent integration of infrastructure with land use.</li> <li>• Accordingly, this policy sits most appropriately with Objective 3.8.</li> <li>• It is unclear what "functional needs" are, and why they are not recognised for all public infrastructure, to achieve strategic integration.</li> <li>• It is suggested that the policy should also recognise the requirement under the LGA for public infrastructure to be cost-effective, efficient, effective and appropriate.</li> <li>• It is important that "efficiently" is clarified to mean in a way that presents the least possible long term cost burden to ratepayers.</li> <li>• It is unclear who will give effect to, and how, for each of the matters listed - policies under 3.4 are not listed under Regional or City/District Plans, nor is there any specific mention in other methods.</li> </ul>
99	Infrastructure - general	Policy 3.4.2 - Managing infrastructure activities	Amend	<ul style="list-style-type: none"> <li>• Delete policy.</li> <li>• In the event the policy is retained, include additional conditions to recognise: <ul style="list-style-type: none"> <li>• Infrastructure should be fit for purpose.</li> <li>• Public infrastructure should be cost-effective, efficient, effective and appropriate.</li> </ul> </li> <li>• Provide a clear description in the methods of how each of the provisions in this policy will be given effect to.</li> </ul>	<ul style="list-style-type: none"> <li>• It is not clear what value this policy adds.</li> <li>• If retained, it is suggested that the policy should also recognise the requirement under the LGA for public infrastructure to be cost-effective, efficient, effective and appropriate.</li> <li>• It is unclear who will give effect to, and how, for each of the matters listed - policies under 3.4 are not listed under Regional or City/District Plans, nor is there any specific mention in other methods.</li> </ul>
100	Infrastructure - general	Policy 3.4.3 - Designing lifeline utilities and facilities for essential or emergency services	Amend	<ul style="list-style-type: none"> <li>• Delete policy.</li> <li>• In the event the policy is retained, move this policy to section 3.2, and reword to refer to the activities of lifeline utilities, not the entities themselves. Also assess the use of the phrase "lifeline utilities" throughout the RPS.</li> </ul>	<ul style="list-style-type: none"> <li>• It is unclear why this policy is necessary. It may fit better in the natural hazard section (3.2).</li> <li>• In a civil defence event, waste management can be critical, as found during the Christchurch earthquakes, or following recent floods where well over 230 tonnes of flood damaged waste required disposal to landfill.</li> <li>• "Lifeline utilities" refers to the company/entity itself, and not the activity it carries out.</li> </ul>
101	Infrastructure - general	Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services	Amend	<ul style="list-style-type: none"> <li>• Amend 3.4.4(a) as follows: "(a) Restricting the establishment of these activities that may result in reverse sensitivity effects on those measures, utilities or services;"</li> <li>• Move this policy to section 3.2.</li> </ul>	<ul style="list-style-type: none"> <li>• It is unclear whether 3.4.4(a) aims to restrict "hazard mitigation measures, lifeline utilities and essential or emergency services" activities, or all other types of activities.</li> <li>• It may also fit better in the natural hazard section (3.2).</li> </ul>
102	Objectives on resilience, health and safety	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Amend	<ul style="list-style-type: none"> <li>• Amend the objective, issue and need to clarify why these provisions should only apply to regionally and nationally significant infrastructure (as defined in Policy 3.5.1), and not locally important public (or even all) infrastructure.</li> <li>• Alternatively, recognise locally important infrastructure in a similar manner in the objective and related provisions.</li> </ul>	<ul style="list-style-type: none"> <li>• It is unclear why infrastructure of regional and national importance constitutes a separate issue and different policy framework. It is unclear why the objective relates only to "infrastructure of regional and national importance", as all infrastructure should be managed sustainably to meet the purpose of the RMA. Reading the related policies, the objective as drafted does not seem to reflect the intent, which may be "infrastructure of national and regional significance is recognised and protected"?</li> <li>• "3 waters" infrastructure is generally of local significance only, in that the networks do not traverse or link districts (as suggested in Policy 3.5.1). However, should those networks fail then the effects would likely have a regional and even national flow-on affect. As written, the issue and the need are equally relevant if "regional and national" are substituted with "local", as is Policy 3.5.3.</li> </ul>
104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Delete Policy 3.5.1 and include as a definition in the glossary. Identify which Otago ports and airports meet this definition.	This is a more streamlined approach and gives better clarity to the intent of policies in 3.5.

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104	Infrastructure of national or regional significance	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend	Amend 3.5.1(f) to identify which structures for transport by rail are included as national or regional importance.	Item (f) could be read to mean that all structures for transport by rail are of national or regional significance. There are many structures for rail that do not fall into this category.
105	Infrastructure of national or regional significance	Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance	Oppose	<ul style="list-style-type: none"> <li>Delete policy.</li> <li>If this policy is retained, clarify: <ul style="list-style-type: none"> <li>The relationship and consistency of this policy with Policies 2.2.2, 2.2.4, 2.2.9 and 2.2.12.</li> <li>What "other values" are being referred to in (c).</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Managing the adverse effects from regionally and nationally significant infrastructure should be no different to managing adverse effects from other activities..</li> <li>The matters in (a) and (b) appear to repeat matters in Policies 2.2.2, 2.2.4, 2.2.9 and 2.2.12, although seem at odds with those policies which require adverse effects to be avoided (not "give preference to avoiding").</li> <li>In (c), it is unclear what "values" refer to. One relevant matter is the safety and amenity values of local communities which can be adversely affected by traffic passing through commercial and residential centres at inappropriate speeds on State Highways. It is suggested that protection of these centres from the adverse effects of nationally or regionally significant infrastructure should be considered.</li> </ul>
106	Infrastructure of national or regional significance	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Amend	Amend Policy 3.5.3 to read " <u>Recognise and</u> protect infrastructure of national or regional significance".	This is a more streamlined approach and gives better clarity to the intent of policies in 3.5.
108	Energy	Policy suite 3.6 - Energy supplies to Otago's communities are secure and sustainable	Amend	<ul style="list-style-type: none"> <li>Add a policy as follows: "Promoting energy efficiency and conservation."</li> <li>Add an associated method for all Councils under methods 8 - Education and Information; and 11 - Advocacy and Support.</li> </ul>	Existing policies under the efficiency heading do not relate to efficiency. Conserving energy and being more efficient in our energy use will reduce the need for generation and transmission, which can have adverse environmental effects.
109	Energy	Policy 3.6.1 - Using existing renewable electricity generation structures and facilities	Amend	<p>Amend as follows:</p> <p><del>"Using existing renewable electricity generation structures and facilities".</del></p> <p><del>"Give preference to the use of existing structures or facilities to increase the region's renewable electricity generation capacity over developing new structures in new locations. Promote the development of renewable electricity generation while managing adverse effects."</del></p>	<ul style="list-style-type: none"> <li>It is considered that existing structures or facilities should not be given preference over new structures or facilities, where they have greater adverse environmental effects, particularly given changes in technology, ownership of existing infrastructure, and locational requirements of new energy needs.</li> <li>It is suggested that renewable electricity generation should be encouraged where adverse effects can be managed, not just small scale generation (as in Policy 3.6.2).</li> </ul>
110	Energy	Policy 3.6.2 - Promoting small scale renewable electricity generation	Amend	<p>Amend as follows:</p> <p><del>"Promote <u>Enable</u> small scale renewable electricity generation, <u>where adverse effects can be appropriately mitigated</u>"</del></p>	To promote the renewable energy requirements of the NPS.
111	Energy	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	Amend	Clarify in the methods how [Policy 3.6.3] will be given effect to.	The methods are not clear how [Policy 3.6.3 Protecting the generation capacity of renewable electricity generation activities] will be given effect to, in particular (a) and (c). Currently run-of-river water use is not considered "allocation" under the Regional Plan: Water for Otago. Depending on how (a) and (c) are to be implemented, there are possibly significant implications for upstream water users. Is Policy 3.6.3, in conjunction with Policy 2.1.1, intended to allow the unfettered operation of electricity generators in perpetuity?
114	Energy	Policy 3.6.6 - Reducing long term demand for fossil fuels	Amend	<p>Reword the policy as follows:</p> <p>"Reduce the long term demand for fossil fuels by...</p> <p>(a) Encouraging the development of compact and well integrated urban areas, to reduce travel needs within <u>and between</u> those areas...</p> <p>(b)(ii) ...and integration with public transport <u>where available</u>;"</p>	<ul style="list-style-type: none"> <li>The development of compact and well integrated urban areas is supported, as it reduces travel needs both between and within areas. The policy aligns with the objectives of the Dunedin City Integrated Transport Strategy, especially that the city's dependence on oil for transport is reduced, and addresses some of the key transport challenges identified in the strategy, including private motor vehicle dependence.</li> <li>The suggested amendments provide greater clarity.</li> </ul>

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117	Urban design	Policy 3.7.1 - Using the principles of good urban design	Support	Retain the policy.	This policy aligns with the objectives of the Dunedin City Integrated Transport Strategy, especially accessibility to key destinations such as healthcare, education, recreation and employment.
118	Urban design	Schedule 6 - Urban form and design	Support	Retain Schedule 6, 1(d) and (e), 2(j), and 3.	These align with the objectives of the Dunedin City Integrated Transport Strategy.
121	Urban design	Policy 3.7.4 - Designing for good access in public spaces	Amend	Retain the policy.	This policy aligns with the objectives of the Dunedin City Integrated Transport Strategy, especially accessibility to key destinations such as healthcare, education, recreation and employment.
122	Objectives on resilience, health and safety	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Amend	Amend as follows: "Urban <del>growth</del> <u>development</u> is well designed and integrates effectively with adjoining urban and rural environments"	<ul style="list-style-type: none"> <li>• Growth implies expansion, whereas development encompasses expansion and increased density.</li> <li>• The concepts of "community infrastructure" and "social infrastructure" are also introduced in the explanation to Objective 3.8, which includes healthcare facilities and schools, inconsistent with the glossary definition of infrastructure.</li> </ul>
124	Urban growth	Policy 3.8.1 - Managing for urban growth	Amend	<ul style="list-style-type: none"> <li>• Amend title as follows: Managing for urban <del>growth</del> <u>development</u>,</li> <li>• Amend the policy to include a focus on the development of compact and well-integrated urban areas, in line with Policy 3.6.6(a).</li> <li>• Amend (c)(i) as follows: "...including loss of highly <del>valued</del> <u>versatile soils</u>..."</li> <li>• Amend (c)(ii) as follows: "Identifying future growth areas that: ...<del>Maintain or enhance</del> <u>Avoid</u> significant biodiversity, landscape or natural character values;"</li> <li>• Delete (f).</li> </ul>	<ul style="list-style-type: none"> <li>• Compact and well-integrated urban areas reduce travel needs between and within areas, enabling more effective and sustainable movement, and accessibility is increased to key destinations and services. Item (e) "efficient use of land", could encompass the concept of compact and well integrated urban areas, but this is not clear.</li> <li>• For (c)(i), the proposed definition of "highly valued" arguably encompasses all soils. "Highly versatile soils" is a more limited term and is defined in the glossary.</li> <li>• For (c)(ii), urban growth should avoid areas with significant natural values.</li> <li>• Heating systems in (f) are unrelated to growth management.</li> </ul>
125	Urban growth	Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas	Amend	Amend as follows: "Where urban growth boundaries, <del>as detailed in Schedule 8,</del> or future urban development areas, <del>are needed to control urban expansion identified in a District Plan or in the RPS (Schedule 8),</del> control the release of land..."	To improve clarity.
127	Urban growth	Policy 3.8.3 - Managing fragmentation of rural land	Amend	<ul style="list-style-type: none"> <li>• Delete 3.8.3(a)(ii) and (iii).</li> <li>• Replace with: "Manage subdivision and development in future urban development areas to ensure activities do not reduce the future efficient and appropriate development of these areas".</li> <li>• Move (c) to sit within Policy 3.8.1(c).</li> <li>• Delete (d).</li> </ul>	<ul style="list-style-type: none"> <li>• The reasoning for including (a) (ii) and (iii) is unclear. If there is need to discuss how to manage areas identified for future urban development, this perhaps sits better under Policy 3.8.2(d).</li> <li>• It is considered that (c) should not just apply to fragmentation of rural land, but all urban growth.</li> <li>• In (d), water will always have competing demands for its use, regardless of the activity. It is considered inappropriate to single out development of rural land as a trigger for assessing competing water demands. How this policy will be implemented, and what water demands might have priority is also unclear (unless that demand is electricity generation where Policy 3.6.3 seeks to protect generation capacity).</li> </ul>
128	Objectives on resilience, health and safety	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	Address hazardous substances, contaminated sites and waste management separately — with their own issues, objectives and policies,	<ul style="list-style-type: none"> <li>• Hazardous substances and waste management have been addressed as a single issue, however, both have quite different issues which results in different policies to manage those issues. The objective, issue and need could be redrafted to better reflect the issue caused by waste materials.</li> <li>• Hazardous substances are a matter that requires to be specifically addressed in an RPS under the RMA. Contaminated sites are another</li> </ul>

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					<p>matter requiring clarification in the RPS.</p> <ul style="list-style-type: none"> <li>Our comments in relation to section 3.9 provisions primarily relate to changes sought regarding waste management. Any changes requested assume that hazardous substance and contaminated site provisions will remain, but be separate to waste management.</li> </ul>
129	Hazardous substances and waste	Policy suite 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend	<ul style="list-style-type: none"> <li>Create a new policy for waste management as follows Provide for the establishment and use of waste management facilities and services, by: (a) Minimising risk associated with natural hazard events; and (b) Restricting the location of activities that may result in reverse sensitivity effects near waste management facilities and services.</li> <li>Clearly identify in the methods how this policy will be given effect to.</li> </ul>	"Waste management facilities" may be a better term, as those facilities are wider than just disposal (landfill), including landfill gas collection systems; waste-transfer stations; resource recovery facilities; and wastewater treatment plants.
130	Hazardous substances and waste	Policy 3.9.1 - Integrating management of hazardous substances and waste	Amend	<p>Add the following matters (a)-(e) to describe how the policy will be given effect to: "Promote an integrated approach to waste management, by:</p> <p>(a) Recognising and providing for the requirements of the NZ Waste Strategy 2010; the Resource Management Act 1991; the Waste Minimisation Act 2008; the Hazardous Substances and New Organisms Act 1996; the Climate Change Response Act 2002; the Local Government Act 2002; and</p> <p>(b) Developing and maintaining a regional monitoring programme to record the quantities and composition of all waste being generated and</p> <p>(c) Regulating the effects of waste disposal through controlling contaminant discharge and monitoring all disposal facilities; and</p> <p>(d) Promoting and supporting region-wide responses to waste; and</p> <p>(e) Promoting and providing information and advice on waste minimisation and management."</p>	<ul style="list-style-type: none"> <li>The promotion of an integrated approach to waste management is supported, however, it is unclear what this means. Other integrated management policies (e.g. 2.3.1 - 2.3.5) describe how e.g. "by: (a) recognising... (b) coordinating... etc.</li> <li>The methods referred to are 7 - Strategies and Plans, and 11 - Advocacy and Facilitation. Method 7 makes no reference to waste management, and should ideally refer to the Waste Management and Minimisation Plans that Councils are required to prepare under the Waste Minimisation Act 2008.</li> </ul>
130	Hazardous substances and waste	Policy 3.9.1 - Integrating management of hazardous substances and waste	Amend	<p>Clearly identify in the methods how [Policy 3.9.1] will be given effect, including an indication of the future role of the now out-of-date and inconsistent with current best practice, Regional Plan: Waste.</p>	<ul style="list-style-type: none"> <li>With regard to waste management, Method 11 only states Councils may advocate the implementation of the waste hierarchy, and will advocate for solid waste management facilities.</li> <li>Waste management is a regionally significant issue where a co-ordinated response is necessary. To provide guidance as to actions that are needed, and who is responsible for them, the ORC is urged to take a greater role in supporting the overall coordination of waste management in Otago, to assist city and district councils to meet their responsibilities under other legislation (also see submissions on methods).</li> <li>For (a) City and District Councils do this through Waste Management and Minimisation Plans, and the Regional Council currently has the Regional Plan: Waste, which also addresses (c). (b) is already addressed in the methods. (d) requires a Regional Council commitment. (e) is an action to be undertaken by all Councils.</li> </ul>
131	Hazardous substances and	Policy 3.9.2 - Managing the use,	Amend	<ul style="list-style-type: none"> <li>Amend Policy 3.9.2 so it relates only to</li> </ul>	<ul style="list-style-type: none"> <li>This policy is about managing accidental spillage and release, and</li> </ul>

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	waste	storage and disposal of hazardous substances, and the storage and disposal of waste materials		<p>hazardous substances.</p> <ul style="list-style-type: none"> <li>Amend hazardous substance provisions as follows</li> </ul> <p>(c) <del>Avoiding adverse effects of these substances and materials on the health and safety of people, and on environmental values, and on other values; and</del></p> <p>(e) <del>Ensuring hazardous substances are treated or disposed of at authorised facilities, or taken to an appropriate disposal facility, in accordance with...</del></p> <p><u>appropriately stored, processed, handled or taken to an appropriate disposal facility, in accordance with...</u></p>	<p>therefore appears to primarily relate to hazardous substances and liquid wastes. However, some of the measures listed relate to managing waste generally and not accidental release (being (d), (f))</p> <ul style="list-style-type: none"> <li>Specify whether it is intended to apply to hazardous substances/liquid wastes or a broader category of wastes. The DCC suggests that addressing wastes and hazardous substances separately would assist.</li> <li>In (d), which relates to managing waste it is unnecessary to distinguish between a waste and a hazardous waste, particularly at RPS level. We note this distinction is not made in (e): once a hazardous substance outlives its usefulness, it becomes a waste.</li> <li>For (e) it is unclear how it will be ensured that wastes are being disposed of at an authorised facility, or what is deemed to be an authorised facility. It is requested that this is described in the methods section of the RPS.</li> <li>In terms of facilities to store, transfer, process, and handle those materials, what constitutes an "authorised facility" may need clarification. "Waste management facilities" may be a better term, as those facilities are wider than just disposal (landfill), including landfill gas collection systems; waste-transfer stations; resource recovery facilities; and wastewater treatment plants.</li> <li>For (c) there is no clarity as to what those "other values" might be. If this is environmental values, then this should be clearly stated.</li> </ul>
133	Hazardous substances and waste	Policy 3.9.4 - Managing the use of contaminated land	Amend	<ul style="list-style-type: none"> <li>Consider if this policy is necessary.</li> <li>If the policy is considered necessary, amend the policy to separate the purposes of addressing effects on human health and the environment, and recognise the NES e.g.: "Manage the use of contaminated land, to protect human health, people and the environment from adverse effects, by: <u>through the application of the NES for Assessing and Managing Contaminants in Soil to Protect Human Health.</u>" NES for Assessing and Managing Contaminants in Soil to Protect Human Health.</li> </ul> <p>a) <del>Prior to subdivision or development of potentially contaminated land, requiring a site investigation is undertaken to determine the nature or extent of any contamination; and</del></p> <p>b) <del>Where there is contamination:</del></p> <p>i. <del>Requiring an assessment of associated environmental risks; and</del></p> <p>ii. <del>Remediating land; and</del></p> <p>e) <u>Manage the ongoing effects of contaminant discharges to water or air from contaminated land.</u> Considering the need for ongoing monitoring of contaminant levels and associated environmental risks."</p>	<ul style="list-style-type: none"> <li>There is an NES for Assessing and Managing Contaminants in Soil to Protect Human Health. Its purpose was to ensure a nationally consistent approach to contaminated land management upon subdivision, and to provide for activities with minor effect. Therefore an RPS policy may not be necessary.</li> <li>It is noted that the policy as drafted does not encompass all aspects of the NES, such as fuel tank removal. These disturbances, subdivision and changes in land use are local site-specific issues rather than regional issues.</li> <li>Submitter notes that not all contaminated land requires remediation - it depends on what resultant sites are being used for.</li> <li>It is the on-going discharges to the environment from those sites which may have environmental effects, rather than the use of those sites.</li> <li>Also please refer to our submission point on Method 3.1.4(g).</li> </ul>
134	Hazardous substances and waste	Policy 3.9.5 - Avoiding the creation of new contaminated land	Amend	Delete policy.	<ul style="list-style-type: none"> <li>It is impossible to avoid the creation of contaminated land e.g. landfills or wastewater oxidation ponds and land disposal areas, are by their very nature, "contaminated land".</li> <li>If the creation of contaminated land is not deliberate (as described above), it is accidental and relates to the handling, storage, use and inappropriate disposal of hazardous substances. Good practice to minimise the accidental spillage of hazardous substances is already</li> </ul>

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					addressed in Policy 3.9.6.
135	Hazardous substances and waste	Policy 3.9.6 - Encouraging use of best management practices for hazardous substance use	Amend	Reconsider wording in light of operative regional plans. Adjust methods accordingly.	The "encourage" in this policy appears at odds with the Regional Plan: Water and Regional Plan: Air, which have rules relating to the use (discharge) of hazardous substances to the environment, and with District Plans which may require best management practice.
136	Hazardous substances and waste	Policy 3.9.7 - Encouraging services for hazardous substances collection, recycling and disposal	Amend	Amend the policy as follows: "Encourage <u>Promote and facilitate</u> the establishment of hazardous substance collection...across the region"	Method 11.1.3 gives effect to this policy, however, it is worded that any Council may advocate for this. However, as a regional response the ORC is in a position to assist the submitter to both promote and facilitate this.
146	Public access to areas of values	Policy 4.1.1 - Maintaining and enhancing public access	Amend	<ul style="list-style-type: none"> <li>Clarify what a "sensitive natural area" is, and how it will be defined or identified.</li> <li>Clarify what an "identified site" is.</li> </ul>	To clarify in policy and methods what a "sensitive natural area" and "identified site" is, or how they are determined.
150	Historic heritage	Policy 4.2.2 - Identifying historic heritage	Amend	<ul style="list-style-type: none"> <li>Amend as follows: "...using the following attributes, detailed in Schedule 7, <u>or closely similar</u>:"</li> <li>Clarify in the method that the DCC will not be required to re-evaluate its scheduled items of historic heritage.</li> <li>Alternatively, amend the attributes to be consistent with those used by the DCC.</li> </ul>	This policy lists attributes for identifying historic heritage. The submitter has used different attributes, although they broadly fit within this framework. To avoid the need to re-evaluate district plan scheduled items based on a slightly different set of criteria.
151	Historic heritage	Schedule 7 - Matters for the identification of historic heritage values	Amend	Clarify that re-evaluation is not required, or amend the attributes to be consistent with those used by DCC.	This schedule lists attributes for identifying historic heritage. Submitter has used different attributes, although they fit broadly within those in Schedule 7. Submitter would prefer not to re-evaluate its scheduled items based on a slightly different set of criteria.
152	Historic heritage	Policy 4.2.3 - Managing historic heritage values	Amend	<ul style="list-style-type: none"> <li>Delete (b) or amend (b) to clarify what "these provisions" are. Note that such sites cannot be identified within a District Plan immediately upon discovery,</li> <li>Amend (c) to remove the word "avoid".</li> <li>Clarify the difference between 'remediating' and 'remediating', or use consistent language.</li> <li>Amend (i) to read "encouraging" rather than enabling.</li> </ul>	<ul style="list-style-type: none"> <li>It is unclear in (b) what 'these provisions' refers to. Provisions managing archaeological sites are included within the DCC's District Plan. However it is not possible to immediately determine a new site as a scheduled archaeological site within the Plan such that the provisions would apply.</li> <li>For (c), it is requested that the policy is framed in an enabling context.</li> <li>(f) uses the term 'remediating', whereas 'remediating' is used in many other policies. It is requested that to ease interpretation issues, the terminology is made more consistent.</li> </ul>
155	Land management for economic production	Policy 4.3.1 - Managing for rural activities	Amend	<ul style="list-style-type: none"> <li>Amend (b) to refer to "highly versatile soils".</li> <li>Amend policy to include support [for] key routes for tourism and freight transport as follows: <u>(f) Maintaining the ability of the key routes that are critical for the transport of freight and visitors, to function to the fullest extent possible.</u></li> </ul>	<ul style="list-style-type: none"> <li>For (b), the proposed definition of highly valued is very broad and arguably encompasses all soils. Highly versatile soils is a more limited term and is defined in the glossary.</li> <li>The policy is supported as the rural economy is crucial. There is a network of key routes that are critical for tourism and freight transport in Otago. It is requested that these are acknowledged.</li> </ul>
156	Land management for economic production	Policy 4.3.2 - Managing land use in dry catchments	Amend	<ul style="list-style-type: none"> <li>Add "Promoting the planting of tussock grasslands and other high water yielding species".</li> <li>Add an associated method.</li> </ul>	<ul style="list-style-type: none"> <li>If forestry is to be discouraged, then it is suggested that species that increase water yield should be encouraged.</li> <li>Control of the use of land for the purpose of maintaining water quantity is a regional function under s30(1)(c)(iii) of the RMA. Management of effects of land use on water quantity is more effectively delivered at a regional level, using a consistent approach to assessment of effects.</li> </ul>
158	Land management for economic production	Policy 4.3.4 - Managing the distribution of commercial activities in larger urban areas	Amend	<ul style="list-style-type: none"> <li>Amend 4.3.4 as follows: "...to maintain the vibrancy of the central business district, <u>promote the efficient use of infrastructure investment in the CBD, and the economic benefits of co-location of business in central locations, particularly retail and office</u></li> </ul>	<ul style="list-style-type: none"> <li>To clarify what (b) is trying to achieve. Adaptive re-use is generally associated with heritage rather than all buildings.</li> <li>To clarify the wording of (c).</li> </ul>

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				<p><u>co-location</u> and support local commercial needs by:"</p> <ul style="list-style-type: none"> <li>• Amend (b) as follows: "Encouraging the adaptive re-use of <u>existing heritage</u> buildings..."</li> <li>• Rewrite (c) as follows: "Manage and restrict the distribution of commercial activities (particularly office and retail activities) outside of centres to avoid or minimise any adverse effects on the vibrancy of the CBD and other centres, or loss of potential positive economic effects from co-location, and to ensure efficient use of public investment in infrastructure in the CBD, and support positive economic effects from agglomeration benefits occurring in the CBD."</li> </ul>	
159	Land management for economic production	Policy 4.3.5 - Managing for industrial land uses	Amend	<p>Add an additional condition to (c) as follows: Restricting the establishment of activities in industrial areas that may result in: ... <u>Competition for land, which increases land prices thereby making continued use for industry unsustainable.</u></p>	Competing activities can increase land prices and make industry unsustainable.
160	Land management for economic production	Policy 4.3.6 - Managing locational needs for mineral gas exploration, extraction and processing	Amend	<ul style="list-style-type: none"> <li>• Clarify how a) will be given effect to.</li> <li>• Provide for District Plans to determine appropriate levels of activities in these areas, if necessary.</li> </ul>	<ul style="list-style-type: none"> <li>• There appears to be a conflict between the policy itself (recognise the needs of the mineral industry to locate where the resource exists) and (a) which seeks to avoid those activities over large areas of natural significance. Some of these activities will be small scale, or any adverse effects may be minor or manageable. It may be appropriate, on a case-by-case basis, to consider and provide for this.</li> <li>• It is unclear how this policy "give preference to avoiding" will be given effect to, and whether some limited activities may still be provided for. It is requested that new methods under 7, strategies and plans, as referenced are introduced to provide guidance on how this policy is to be implemented. While the DCC would generally not support mineral extraction in areas of natural significance, it is considered that there should not be a blanket prohibition. For example where activities are small scale and the effects minor.</li> </ul>
163	Making the most of available resources	Policy 4.4.1 - Ensuring efficient water allocation and use	Amend	<ul style="list-style-type: none"> <li>• Amend (b) as follows: "<u>Requiring Promoting</u> the development or upgrade of infrastructure that increases use efficiency".</li> <li>• Clearly identify in the methods how this policy will be given effect.</li> </ul>	<ul style="list-style-type: none"> <li>• Submitter manages collection, supply, treatment and distribution of water to around 49,000 properties. This includes 21,000 hectares of water catchment, 1,450 km of pipeline, 12 treatment stations, 35 pumping stations and 57 reservoirs (raw and treated water). Aging infrastructure is an issue, and maintenance and upgrades are ongoing. Submitter balances the need to respond to urgent and planned works, with risk and affordability.</li> <li>• Most infrastructure upgrades will increase water use efficiency, however, this needs to be balanced with other factors, including practicality, affordability, environmental benefit, and competing projects for Council budgets.</li> <li>• It is assumed that this policy would be applied when consent to take and use water is sought. Infrastructure upgrades may not be timed to fit into consent timeframes, therefore a policy that "promotes" this outcome provides for infrastructure upgrades to be managed effectively.</li> </ul>
164	Making the most of available resources	Policy 4.4.2 - Encouraging waste minimisation	Amend	<ul style="list-style-type: none"> <li>• Move this policy to sit with other waste policies (currently in 3.9).</li> <li>• Amend policy to reflect the waste hierarchy in accordance with the Waste Minimisation Act</li> </ul>	<ul style="list-style-type: none"> <li>• To provide increased coherency on waste provisions, and because the policy fits better with the requested revised objective for waste.</li> <li>• Section 44 of the Waste Minimisation Act 2008 specifies the waste minimisation hierarchy.</li> </ul>

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				2008, by including "treatment" between items (d) and (e). • Amend (e) as follows: "Disposing residual waste to <del>authorised landfill</del> ".	• It is unclear how it will be ensured that wastes are being disposed of at an authorised landfill, or what is deemed to be an authorised landfill. This would ideally be described in the methods. Currently, cleanfills, monofills and farm landfills are permitted activities under the Regional Plan: Waste, so this would be difficult to determine. The Waste Minimisation Act 2008 refers to "disposal facilities".
164	Making the most of available resources	Policy 4.4.2 - Encouraging waste minimisation	Amend	Clearly identify in the methods who will give effect to each aspect of [Policy 4.4.2 - Encouraging waste minimisation] and how.	How it will be ensured that wastes are being disposed of at an authorised landfill would ideally be described in the methods. City and District Councils bear most responsibility in preparation of their Waste Management and Minimisation Plans, while the Regional Council has a role to play in data collection and managing contaminant discharges.
168	Management of adverse effects	Policy 4.5.1 - Avoiding objectionable discharges	Amend	Delete Policy 4.5.1.	<ul style="list-style-type: none"> <li>• The term "avoid" is directive and can only be met by prohibiting an activity, in circumstances where remediation or mitigation of effects is unacceptable. There may be instances of short term, low impact or minor adverse effects which the RPS could provide for.</li> <li>• Addressing how this policy would be given effect under Method 3 Regional Plans will also assist.</li> <li>• Many discharges are potentially offensive to takata whenua and the wider public, the list (a) - (c) is not limited, but merely a list of possible inclusions.</li> <li>• With regard to (a), the submitter manages consented significant human waste discharges directly into water, and in close proximity to water. Many Dunedin residents rely on septic tanks which discharge in proximity to water.</li> <li>• With regard to (b), this would effectively prohibit the use of any hazardous substance, which includes commonly used herbicides, and pesticides (currently permitted by the Water Plan) in a number of areas. The DCC undertakes weed spraying for pest control, public amenity, to maintain infrastructure, and to provide public access.</li> <li>• With regard to (c), there are many types of odorous and conspicuous discharges that may be acceptable. Many consented air discharges may be smelt, and most domestic wood burners are both conspicuous and odorous, even when operated efficiently.</li> </ul>
173	Management of adverse effects	Policy 4.5.6 - Managing adverse effects from mineral and gas exploration, extraction and processing	Amend	Clarify how a) will be given effect to.  Provide for District Plans to determine appropriate levels of activities in these areas, if necessary.	<ul style="list-style-type: none"> <li>• There appears to be a conflict between the policy itself (recognise the needs of the mineral industry to locate where the resource exists) and (a) which seeks to avoid those activities over large areas of natural significance. Some of these activities will be small scale, or any adverse effects may be minor or manageable. It may be appropriate, on a case-by-case basis, to consider and provide for this.</li> <li>• It is unclear how this policy "give preference to avoiding" will be given effect to, and whether some limited activities may still be provided for. It is requested that new methods under 7, strategies and plans, as referenced are introduced to provide guidance on how this policy is to be implemented. While the DCC would generally not support mineral extraction in areas of natural significance, it is considered that there should not be a blanket prohibition. For example where activities are small scale and the effects minor.</li> </ul>
177	Roles and responsibilities	Roles and responsibilities	Amend	<ul style="list-style-type: none"> <li>• Delete clause (c) of Regional Council will specify objectives, policies and methods for the control of the use of land for: <del>The maintenance of indigenous biological diversity in the coastal marine area, in beds of rivers and lakes, and wetlands.</del></li> <li>• Amend "Regional, City and District Councils will" as follows:</li> </ul>	<ul style="list-style-type: none"> <li>• The Regional Council, as set out in the current RPS, should be the lead agency for co-ordinating the response to threats to biodiversity and biosecurity across all parts of the region. Limiting the roles and responsibilities of the Regional Council as set out in the proposed RPS represents a significant scaling-back of intent in relation to biodiversity management and protection.</li> <li>• The amendments are proposed to clarify that joint responsibility pertains to margins of rivers and lakes rather than beds (which are not</li> </ul>



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				Share joint responsibility for specifying objectives, policies and methods for the purpose of the maintenance of indigenous biological diversity through the management of the margins of the coastal marine area, beds of rivers and lakes, and wetlands.	the responsibility of DCC).
178	Methods	Methods - general	Amend	Ensure methods clearly describe how each aspect of all policies in the RPS will be given effect to, in consultation with City and District Councils if they are affected.	To clarify which method gives effect to which policy.
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend [Method 3.1.4(g)] to clarify that the Regional Council's role in contaminated land management is for any on-going discharges from those sites.	<ul style="list-style-type: none"> <li>Regional councils control land for the purposes of water quality, and any discharges that may occur from contaminated land, to water or to air.</li> <li>Regional Plan: Waste requires all "disturbance" of contaminated sites to obtain consent, which does not align with the NES for Assessing and Managing Contaminants in Soil to Protect Human Health. Further, the approach of managing contaminated land for the purpose of water quality obscures Council RMA functions. Managing effects of contaminated land on water quality should be achieved by controlling discharges from sites, consistent with Water Plan Change 6A, where land use management has been through a discharge rule (regarding nitrogen).</li> </ul>
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Amend wording [of Method 3.1.4(h)] as follows: Require solid waste disposal facilities to monitor record and report on the <del>type and amount of material entering the waste stream and solid waste quantity and composition of waste being deposited discharged to landfill.</del>	These provisions support Waste Minimisation Act 2008 requirements for City and District Councils to undertake waste assessments, and for strategic forecasting and planning. However, the wording used should be consistent with this Act, industry standard and Method 6.2.1(f).
189	Method 3 - Regional Plans	Method 3.1 - Developing regional plans	Amend	Include regional plans as a method [for promoting the planting of tussock grasslands and other high water yielding species].	Control of the use of land for the purpose of maintaining water quantity is a regional function under s30(1)(c)(iii) of the RMA. Management of effects of land use on water quantity is more effectively delivered at a regional level, using a consistent approach to assessment of effects.
190	Method 3 - Regional Plans	Method 3.2 - Implementing regional plans	Amend	<ul style="list-style-type: none"> <li>Move [Method 3.2.2] to sit before [Method 6.2.1(e)]</li> <li>Amend the method, or include a new method, to identify how the Regional Council will monitor contaminated sites.</li> </ul>	<ul style="list-style-type: none"> <li>This method relates to implementing Policy 3.9.3, the regional council function to identify contaminated sites. As there is no Land Plan for Otago, this method would sit better under Method 6.2.1 (Regional Council research), where the method on keeping a contaminated site register also sits.</li> <li>It is noted that Policy 3.9.3 is not currently referenced to Method 3.2.2.</li> <li>Under the RMA it is a function of Regional Councils to monitor contaminated land. Monitoring is mentioned in Policy 3.9.4, however, there is no associated method.</li> </ul>
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	<ul style="list-style-type: none"> <li>Delete Method 4.1.2.</li> <li>Include a new method (possibly under Method 2 as it does not fit well under Method 4) as follows: "City and District Councils will implement Policy 3.8.1 through the Building Consent process, by only granting consent where the discharge from the heating appliance meets the relevant ORC discharge standards."</li> </ul>	<ul style="list-style-type: none"> <li>When a building consent application for installation of a solid fuel heating appliance is made, it is considered against the list of ORC-approved appliances. Building consent is not granted if the appliance does not meet ORC air discharge standards. This works well, and addresses the issue at an appropriate stage of development (building).</li> <li>Placing conditions on a land use or subdivision consent is unlikely to work well:</li> <li>On-going conditions on subdivision consents are applied through a consent notice. Such an issue on a consent notice is considered inappropriate.</li> <li>Discretion is not currently given to this for many land use consents,</li> </ul>

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					and the District Plan would require major change to achieve this. At the time of a subdivision and land use consent application, details such as the method of heating may not have been determined. <ul style="list-style-type: none"> <li>Using conditions on these consents is a more complicated and expensive way of achieving the same outcome as is currently achieved, and is contrary to the Government push for simplifying and streamlining the resource consent process.</li> <li>A final point to note is that almost all the existing dwellings within Dunedin would not be covered through subdivision and land use consents.</li> </ul>
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Oppose	Delete Method 4.1.3.	Policy 4.5.1, which relates to avoiding (prohibiting) certain discharges should not encompass the discharge of dust. Discharges to air are a Regional Council function and should therefore not be in the methods for City and District plans.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Oppose	Delete Method 4.1.4.	Control of the use of land for the purpose of maintaining water quantity is a regional function under s30(1)(c)(iii) of the RMA. Management of effects of land use on water quantity is better delivered at a regional level, using a consistent approach to assessment of effects.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Oppose	Delete Method 4.1.11.	Councils are unable to protect important sites, or facilitate Kai Tahu access to them, through the District Plan.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	<ul style="list-style-type: none"> <li>Amend [Method 4.1.9](a) as follows: "Including accidental discovery protocols as conditions on advice notes on consent for earthworks or other activities that may unearth archaeological features ..."</li> <li>Correct wording to read 'Policy 4.2.3' rather than '4.3.2'.</li> </ul>	<ul style="list-style-type: none"> <li>It is not the responsibility of City or District Councils to manage the archaeological authority process. The application of such a condition is considered an inefficient mechanism, likely to add to consent costs and result in duplication, and inconsistent with the streamlining and simplifying of the RMA. The use of advice notes on resource consents generally works well. However, resource consents are only issued for a small proportion of the earthworks undertaken, e.g. in the Dunedin urban area up to 100 m<sup>2</sup> of earthworks can occur as of right, while in the rural area it is up to 200 m<sup>2</sup></li> <li>This section refers to the incorrect policy.</li> </ul>
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Amend [Method 4.1.12] as follows: "(a) Establishing urban growth boundaries <u>or identifying future urban development areas</u> where required to manage pressure for urban development; (b) Ensuring urban growth boundaries <u>or urban development areas</u> contain sufficient capacity..." (c) Requesting the ORC to include urban growth boundaries <u>or future urban development areas</u> in the RPS."	To align with the wording used by the DCC.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Delete Method 4.1.4	Control of the use of land for the purpose of maintaining water quantity is a regional function under s30(1)(c)(iii) of the RMA. Management of effects of land use on water quantity is more effectively delivered at a regional level, using a consistent approach to assessment of effects.
193	Method 4 - City and District Plans	Method 4.1 - Developing district plans	Amend	Include a new method under City and District plans to describe that those Councils will address adverse effects from the subdivision, development or use of contaminated land, and give effect to the NES for Assessing and Managing Contaminants in Soil to Protect Human Health.	No reason given.
193	Method 4 - City and District Plans	Method 4.1 - Developing district	Amend	Delete Method 4.1.11.	Councils are unable to facilitate Kai Tahu access to sites of cultural

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		plans			significance through the District Plan.
194	Method 4 - City and District Plans	Method 4.2 - Implementing district plans	Amend	Amend [Method 4.2.4] as follows: "City or District Councils will implement Policies 4.3.1, 4.3.2, 3.8.1 and 3.8.2 by preparing <u>or requiring developers to prepare</u> structure plans for large scale land use changes subdivisions."	Structure plans do not relate to home heating as referenced to Policies 4.3.1. or 4.3.2, and they are often prepared by developers and not the Council. Reference to subdivision is considered more appropriate than to large scale land use changes.
195	Method 4 - City and District Plans	Method 4.3 - Monitoring and reviewing district plans	Oppose	<ul style="list-style-type: none"> <li>Delete Method 4.3.1.</li> <li>Alternatively, amend as follows: "City and District Councils will monitor and review regional city and district plans".</li> </ul>	City and District Councils are not responsible for reviewing regional plans. If this is in error, and is meant to read "City and District plans", it is suggested this does not need stating in the RPS as it is a requirement under the RMA.
198	Method 6 - Research, Monitoring and Reporting	Method 6.1 - Identification of important resources	Support	Retain [Method 6.1.3(c)].	No reason given.
199	Method 6 - Research, Monitoring and Reporting	Method 6.2 - Research	Support	Retain [Method 6.2.1(d)].	No reason given.
199	Method 6 - Research, Monitoring and Reporting	Method 6.2 - Research	Amend	Clarify the intent of [Method 6.2.3(b)], noting it is not the responsibility of City and District Councils to address Regional Council rules.	The meaning and purpose of Method 6.2.3(b) is unclear, particularly in relation to sharing information on regional rules. City and District Council planners may not be aware of when and how to comply with (iv) which states "development or subdivision approved by consent, which have the potential to adversely affect air quality and breach regional rules".
199	Method 6 - Research, Monitoring and Reporting	Method 6.2 - Research	Amend	Amend wording [of Method 6.2.1(f)] as follows: Provide City and District Councils with regional data on the quantity and composition of waste entering the waste stream and solid waste being disposed <u>being discharged to landfill</u> for strategic forecasting and planning <u>waste assessments</u> .	These provisions support Waste Minimisation Act 2008 requirements for City and District Councils to undertake waste assessments, and for strategic forecasting and planning. However, the wording used should be consistent with this Act, industry standard and Method 3.1.4(h).
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Amend	Add Waste Management and Minimisation Plans that Councils are required to prepare under the Waste Minimisation Act 2008.	No reason given.
203	Method 7 - Strategies and Plans (non-RMA)	Method 7 - Strategies and Plans (non-RMA)	Amend	Add Biodiversity Strategy to Method 7.	To clarify the issues and approach to address biodiversity issues.
204	Method 7 - Strategies and Plans (non-RMA)	Method 7.1 - Natural hazards strategies	Support	Retain Method 7.1, natural hazard / climate change strategies.	No reason given.
206	Method 7 - Strategies and Plans (non-RMA)	Method 7.3 - Regional Land Transport Plan	Amend	<ul style="list-style-type: none"> <li>Correct the title of the Regional Land Transport Plan.</li> <li>Replace the word "method" with "activities".</li> <li>Amend the method as follows: Regional Plan Land Transport Plan will set <u>out</u> objectives, policies and <u>activities</u> methods to <u>assist in the implementation of policies</u> 3.4.1 - 2, 3.5.1, 3.7.1 and 3.7.4. <u>with a particular focus on:</u> 7.3.1 Enhancing road safety; 7.3.2 Ensuring travel needs in Otago are met; 7.3.3 Enabling increased freight efficiency; 7.3.4 Managing Otago's public transport services.</li> </ul>	<ul style="list-style-type: none"> <li>The main "methods" included in the Regional Land Transport Plan (RLTP) are transport activities put forward by Approving Authorities for government funding.</li> <li>When preparing the RLTP, the RTC is required to take the RPS into account. It is considered that "implement" is too strong when describing the relationship between the RLTP and the RPS.</li> <li>The method lists four focus areas for the RLTP and is directed at enabling land transport. Also an RLTP must be consistent with the Government Policy Statement on Land Transport, therefore when the next one is released, the key focus could change.</li> <li>There are other important focuses for the region — including resilience, tourism, enabling travel choices.</li> </ul>
210	Method 8 - Education and Information	Method 8 - Education and Information	Amend	<ul style="list-style-type: none"> <li>Retain [Methods] 8.1.1 (b)(ii), 8.1.2 (a)(iii), 8.1.4 (e) and (f).</li> <li>Add additional provisions to Method 8.1.4 as follows: - Provide information and guidance on sustainable, safe transport, including different modes of transport.</li> </ul>	For 8.1.4, the DCC will provide information on sustainable and safe transport which assists in the implementation of multiple objectives and policies in the RPS. Waste management is a key DCC area of responsibility.

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				- Provide information and guidance on waste minimisation and appropriate waste disposal.	
210	Method 8 - Education and Information	Method 8 - Education and Information	Amend	Add an associated method [Promoting energy efficiency and conservation] for all Councils under Method 8.	Conserving energy and being more efficient in our energy use will reduce the need for generation and transmission, which can have adverse environmental effects.
217	Method 11 - Advocacy and Facilitation	Method 11 - Advocacy and Facilitation	Amend	Add an associated method [Promoting energy efficiency and conservation] for all Councils under Method 11.	Conserving energy and being more efficient in our energy use will reduce the need for generation and transmission, which can have adverse environmental effects.
218	Method 11 - Advocacy and Facilitation	Method 11.1 - Promotion	Amend	Amend methods to include [promoting and facilitating hazardous substance collection ] as a Regional Council role (e.g. changing may to will in Method 11.1.3).	Method 11.1.3 gives effect to [Policy 3.9.7], however, it is worded that any Council may advocate for this. However, as a regional response the ORC is in a position to assist the submitter to both promote and facilitate this.
218	Method 11 - Advocacy and Facilitation	Method 11.1 - Promotion	Amend	<ul style="list-style-type: none"> <li>Retain Method 11, and in particular 11.1.2(a)(iv); 11.1.2(a)(v); 11.1.2(c).</li> <li>Add an additional matter to Method 11.1.2 or 11.1.3 as follows: "Advocate for safer speed limits."</li> </ul>	To provide advocacy on sustainable and safe transport, to assist in the implementation of multiple objectives and policies.
223	Method 11 - Advocacy and Facilitation	Method 11.2.1 - Facilitation by regional, city and district councils - compulsory	Amend	Add an additional matter to Method 11.2.1(c) as follows: "Sustainable and safe transport, including mode choice"	To provide advocacy on sustainable and safe transport, to assist in the implementation of multiple objectives and policies.
226	Anticipated Environmental Results	Anticipated Environmental Results - General	Amend	<ul style="list-style-type: none"> <li>Include an AER that relates to waste, e.g. "The waste hierarchy is implemented, resulting in less waste requiring disposal, and environmental effects of waste are minimised."</li> <li>Include AER relating to hazardous substances and contaminated sites.</li> </ul>	There is currently no clear AER related to waste, hazardous substance, or contaminated sites issues.
238	Anticipated Environmental Results	AER 3.3 - Otago's infrastructure is safe, efficient and continues to operate through disruptive events	Amend	<ul style="list-style-type: none"> <li>Amend as follows: "Otago's infrastructure is <u>safe, efficient, effective and affordable</u> and continues to operate through disruptive events"</li> <li>Include an indicator and measure on road safety: Road safety in Otago improves. Measured by New Zealand Transport agency statistics and models.</li> </ul>	<ul style="list-style-type: none"> <li>The key drivers for public infrastructure are efficiency, effectiveness and affordability.</li> <li>Road safety is a key issue across Otago, and an easy to measure indicator of the safety of Otago's roading infrastructure.</li> <li>For indicator measures, it should be noted that risk assessment reports may not be available for all infrastructure. An alternative useful indicator could be a measurement of actual performance of lifeline and essential service utilities, for example number and length of road closures on State Highways.</li> </ul>
239	Anticipated Environmental Results	AER 3.4 - Adverse effects on highly-valued resource values from nationally and regionally significant infrastructure are avoided or mitigated	Amend	Amend AER in accordance with our other submissions relating to nationally and regionally significant infrastructure, and consistent terminology,	<ul style="list-style-type: none"> <li>The RMA definition of natural and physical resources includes all structures, which makes the meaning of the AER unclear.</li> <li>The AER also seems to draw a strong link between outstanding or significant environments, and nationally and regionally significant infrastructure. That link is not otherwise evident throughout the RPS?</li> </ul>
240	Anticipated Environmental Results	AER 3.5 - The use of local renewable energy sources in Otago increases and reliance on fossil fuels decreases	Amend	Include an indicator relating to the increasing use of local renewable energy sources in Otago.	No indicator is included which relates to increasing the use of local renewable energy sources in Otago.
242	Anticipated Environmental Results	AER 3.7 - Urban areas can adapt to evolving standards & changing requirements of its inhabitants and surrounding natural and physical environment	Amend	Amend indicator as follows: "Traffic <u>Road</u> safety in Otago improves"	The terminology "traffic safety" has a focus on motorised vehicles. Safety is crucial for all transport modes. The term "road safety" is considered to be more inclusive of all modes including pedestrians and cyclists.
244	Anticipated Environmental Results	AER 4.2 - Otago's significant historic heritage is identified, protected, and integrated into current and future uses	Amend	Amend the indicator to be more specific, e.g. "The number of registered heritage buildings that meet <u>contemporary health and safety standards</u> the minimum threshold for seismic performance has increased.	The DCC does not necessarily gather information that would be meaningful in terms of 'meeting standards'.

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249	Glossaries	Glossary	Amend	Include definition of waste disposal facility in glossary, consistent with the Waste Minimisation Act 2008.	<ul style="list-style-type: none"> <li>The Waste Minimisation Act 2008 refers to "disposal facilities", but while the term is used elsewhere in the RPS it has not been included in the glossary. The glossary could confirm that this definition is intended to apply to the RPS.</li> <li>Wording should be consistent with this Act, industry standard and Methods 6.2.1(f) and 3.1.4(h).</li> </ul>
249	Glossaries	Glossary	Oppose	Delete definition [of Hazardous waste].	The term is only used once in the RPS (policy 3.9.2). It is proposed that the Regional Plan is given better effect by not distinguishing between a waste and a hazardous waste, particularly at RPS level.
249	Glossaries	Glossary	Support	Retain the definition of waste consistent with the Waste Minimisation Act 2008.	For consistency with the Waste Minimisation Act 2008.
249	Glossaries	Glossary	Amend	Include "waste disposal and waste management services" in the glossary definition of "essential service", [or "emergency service"].	In a civil defence event, waste management can be critical, as found during the Christchurch earthquakes, or following recent floods where well over 230 tonnes of flood damaged waste required disposal to landfill.
253	Other comments	Structure of the document & useability - general	Amend	Use the traditional approach where regionally significant issues are stated at the beginning of each section, followed by objectives, policies, methods and Anticipated Environmental Results.	<ul style="list-style-type: none"> <li>For ease of understanding.</li> <li>The structure of the RPS is difficult to follow, as all issues are identified under four outcomes, and methods are not expressly linked to policies.</li> </ul>
253	Other comments	Structure of the document & useability - general	Amend	[Have] consistency of language between the RPS and the District Plans that must give effect to the RPS.	So that a District Plan would be consistent, word RPS objectives and policies so that there is a link between the class of the activity status of the rule and the objective or policy. For example "provide for" in a policy links to all rules except non-complying.
253	Other comments	Structure of the document & useability - general	Amend	Consider restructuring the RPS to address each resource type (e.g. air, coast, hazardous substances) in separate chapters. Each chapter would include issues, objectives, policies, methods, and anticipated environmental results as a coherent narrative.	To structure the RPS in a more traditional format. It would provide a more consistent narrative if all provisions associated with each resource were addressed separately.
253	Other comments	Structure of the document & useability - general	Amend	Review and clarify use of the different terms "maintain", "preserve", "retain" and "sustain", and ensure they are used deliberately and consistently throughout the [RPS].	Subtle differences in wording are often interpreted as significant and meaningful. These words have similar, but ultimately different meanings.
253	Other comments	Structure of the document & useability - general	Amend	Review and clarify use of the different terms "enhance" and "restore", and ensure they are used deliberately and consistently throughout the [RPS].	Subtle differences in wording are often interpreted as significant and meaningful. These words have similar, but ultimately different meanings.
253	Other comments	Structure of the document & useability - general	Amend	Review and clarify use of the different terms: <ul style="list-style-type: none"> <li>natural environment</li> <li>productive and natural environment</li> <li>natural resources</li> <li>natural and physical resources</li> <li>natural and physical environment</li> <li>natural systems</li> <li>built environment</li> <li>built form</li> <li>natural and built resources</li> <li>natural and built environment</li> </ul> and ensure they are used deliberately and consistently throughout the [RPS].	Subtle differences in wording are often interpreted as significant and meaningful. These words may have similar, but ultimately different meanings.
253	Other comments	Structure of the document & useability - general	Amend	Clearly identify "explanations" and "principal reasons for adopting", and place each one in a single location.	To provide a more consistent narrative. Because disjointed text, articulated in different ways, forms the explanations and principal reasons for adopting provisions, clarity is lost. Therefore provide these RMA requirements clearly and specifically for greater clarity and

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					consistency.
255	Other comments	Introduction - Overview and the Otago Region	Amend	Provide further guidance on where an RPS sits within the wider planning framework.	For further guidance on the RPS to include the statutory framework from Appendix 1 in Part A — Overview, and show how other policy documents and plans fit, and provide an overview table of how the RPS issues, objectives, policies and methods connect.
255	Other comments	Introduction - Overview and the Otago Region	Amend	Include a description of the geographical distribution of the people of Otago.	People are an important part of the Otago region.
258	Other comments	Consequential amendments & other amendments providing relief	Amend	Make any other minor and consequential amendments as may be necessary to give effect to the submitter's submission.	To give effect to the submission.
259	Overall approach	Regionally significant issues	Amend	<ul style="list-style-type: none"> <li>• Ensure that there is a more comprehensive identification and articulation of regionally significant issues and, where an issue is regionally significant, responsibilities are allocated appropriately through relevant methods, and consistency of language and terms.</li> <li>• Include more comprehensive identification and articulation of the regionally significant issues, showing how these are to be addressed with the objectives and policies..</li> </ul>	<ul style="list-style-type: none"> <li>• Identification of RSIs is required under s32 of the RMA.</li> <li>• Submitter's principal concern is clarity and consistency of language regarding issues and responsibilities for them.</li> <li>• The DCC has previously identified Waste and Biodiversity as regionally significant issues.</li> </ul>
284	Objectives on resilience, health and safety	Introduction to Objective 3.3	Amend	Amend the final sentence in explanatory text [to Objective 3.3] as follows: " <del>...impacts costs</del> can be reduced <del>and benefits enhanced</del> ."	Given that some "impacts" are beneficial, It may be preferable to reduce 'costs' rather than 'impacts,' Clarification is sought as to what 'enhancing benefits' means, as it is not referred to in any policy.
285	Objectives on resilience, health and safety	Introduction to Objective 3.4	Amend	In the event [Objective 3.4] is retained, clarify what is meant by "services" in the explanation.	From the explanation, it is unclear what "services" are being referred to, that are not infrastructure services. "Services" may be essential and emergency services, hazard mitigation measures and lifeline utilities, which are introduced in Policies 3.4.3 and 3.4.4. Clarification is requested.
285	Objectives on resilience, health and safety	Introduction to Objective 3.4	Amend	<p>In the event [Objective 3.4] is retained, amend the explanation as follows:</p> <p><u>Infrastructure is diverse, and includes the assets and services of water supply, drainage, irrigation, electricity, telecommunication, roads and ports. It may service individual farms or developments, towns, the wider region, or contribute to the national network. It may be public or private. Infrastructure is essential. It supports</u> It is essential for Otago's economy and the wellbeing and health and safety of its communities, that the people of Otago are serviced by the right infrastructure at the right time. Some infrastructure is provided by local authorities (such as water supply, wastewater and stormwater) while others are managed by private companies.</p> <p>Local authorities have a role to play, to ensure that the local and regional infrastructure needs are being met. Good quality infrastructure is cost effective, and meets the needs of the communities it services. Various legislation provides for and supports provision of</p>	<ul style="list-style-type: none"> <li>• Infrastructure is a wide ranging term, encompassing networks. It is expressly addressed under Objectives 3.4 and 3.5. While 3.5 applies only to infrastructure of regional and national significance, 3.4 applies to all infrastructure. A clear explanation as to the objective is sought.</li> <li>• The concepts of "community infrastructure" and "social infrastructure" are also introduced in the explanation to Objective 3.8, which includes healthcare facilities and schools, inconsistent with the glossary definition of infrastructure.</li> <li>• New infrastructure may be privately owned and developed, by individuals through to corporates/companies, so are not subject to the same LGA requirements as for publicly-owned infrastructure.</li> <li>• The explanation would benefit from amendments to better support the objective.</li> </ul>

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				<u>infrastructure. New development should complement existing infrastructure where possible.</u>	
287	Objectives on resilience, health and safety	Introduction to Objective 3.6	Amend	Reword the explanation [related to Objective 3.6] as follows: "In particular, Otago's reliance on fossil-based transport fuels could be reduced in the medium to long term through <u>improved access to active and shared transport, more efficient transport of freight, and more efficient or alternative transport fuels.</u> "	The wording does not reflect the way of reducing fossil-based transport fuels that is most relevant to Otago transport. The suggested change also better reflects Policy 3.6.6.
289	Objectives on resilience, health and safety	Introduction to Objective 3.8	Amend	Use consistent wording in relation to infrastructure in the explanation [to Objective 3.8].	The concepts of "community infrastructure" and "social infrastructure" are introduced in the explanation, which includes healthcare facilities and schools, inconsistent with the glossary definition of infrastructure.
301	Objectives on use and enjoyment of natural and built environment	Introduction to Objective 4.5	Amend	Provide clarity in the explanation to Objective 4.5.	The explanation, as drafted, is unclear. Reference to section 2.3 appears to be in error, as it is section 2.2 that seeks to avoid adverse effects? This objective, to minimise adverse effects, seems inconsistent with all the policies that seek to avoid adverse effects?