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Lisa Miers

From: Peter Wilson <p.wilson@fish-game.org.nz>
Sent: Friday, 25 September 2015 2:58 p.m.
To: Policy Reply
Subject: Further submission from the Otago Fish and Game Council on the proposed RPS
Attachments: Fish and Game further submission.xlsx

Dear Sir / Madam

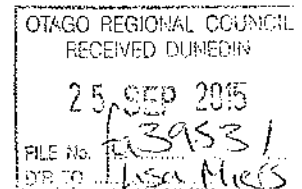
This is a further submission from the Otago Fish and Game Council on the proposed Regional Policy Statement for Otago. I can confirm that Fish and Game has an interest greater than that of the public generally, and is not a trade competitor for the purposes of the Act.

Fish and Game wishes to be heard on our initial submission and further submission points.

Given the volume of submission points, Fish and Game's submission points are enclosed in Excel spreadsheet form attached to this email. I hope this is sufficient – it should make analysis for your team easier as it can be cut and pasted into the submissions database.

Cheers
Peter

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Peter Wilson
Environmental Officer
Otago Fish and Game Council
Tel: 03-479-6552
Cell: 021 151 3486



1 Whole Regional Policy Statement (general support)

Fish and Game

Name	Numbe	Position	Decision Requested	Reason for Decision Requested	Support/Oppose	Reasons	Decision sought
John and Liz McKenzie	14	Support	In support of the Proposed RPS.	<ul style="list-style-type: none"> • Encapsulates our values and aspirations. • Recognises and respects Otago's first people. 	Support	No reason given	No change
Brian Turner	30	Support	Resist attempts to alter or reject major parts of the proposed RPS.	<ul style="list-style-type: none"> • We are on the brink of the sixth mass extinction, which is being driven by humans (J. Zalasiewicz, Guardian Weekly) • 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) • 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 	Support	No reason given	No change
Environment Southland	32	Support	Support	Well presented and easy to comprehend; the format, with the addition of needs, combined methods and environmental results and indicators works well and avoids duplication.	Support	No reason given	No change
Central Otago District	37	Support	Support the majority of provisions contained in the	No reason given.	Support	No reason given	No change
Queenstown Lakes District	95	Support	Support	PRPS addresses current planning issues in a clear and concise manner and will support	Support	No reason given	No change
Otago Conservation Board	155	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;	<p>The document does well in providing:</p> <ul style="list-style-type: none"> • a close companion to the Board's coming Conservation Management Strategy where both consider the broad connections between environmental stability and social development; 	Support	No reason given	No change
Guardians of Lake Wanaka and Guardians of Lake Hawea	73	Oppose	<ul style="list-style-type: none"> • Review the outcomes to make them more tangible, measurable, and inspirational. • Clarify the operational intent behind the PRPS though more detailed methods and the "review of vague or ambiguous statements ("values", "recognise"). • Clearly spell out the nature of the relationship of 	<ul style="list-style-type: none"> • The PRPS does not provide for the requirements of the RMA: • It only provides a slim list of many but not all of the "resource management issues of the region". • Methods are lacking in detail. • The proposed 4 outcomes are weak and have no stretch. 	Support	No reason given	No change
Contact Energy Limited	74	Support	Support intent and in particular: <ul style="list-style-type: none"> • the positive focus on desired outcomes; 	Focus on desired outcomes rather than issues as problems forward looking, aspirational, enables	Support	No reason given	No change

Matthew Sole	75	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"> • Appreciate the layout and intent, clear four high level outcomes. • Lack of definition around how development and growth interacts with restoring and retaining our finite resources. • Generalised non-specific objectives. • Need more detail on causes of problem and how and where to achieve integrated management • Policies need further detail on how the issues with objective polices and methods to address and or achieve them.
Darby Planning LP	81	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"> • 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. • 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. • The Court also found that what adverse effects are to be avoided ad what activities are appropriate, need to be assessed by reference to what is to be protected.

Support

Fish and Game also seek the reinsertion of a single list of regionally significant issues No change

Neutral

EDS v Marlborough District Council (the King Salmon) case refers to national policy statements rather than regional policy statements

McKeague Consultancy Ltd	89	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.	Oppose	No case law is stated to support this assertion. Fish and Game considers that the RPS does use the "avoid" test only where necessary. "Minimise" is not a commonly used RMA term, and Fish and Game's submission has sought the removal of this term and it's replacement with either "avoid", "remedy", or "mitigate".	No change
McKeague Consultancy Ltd	89	Amend	Add clarity as to whether, to be deemed "significant", resources need to meet all criteria or just one, in the relevant policies.	No reason given.	Support		Clarity is needed on how significance tests are to be applied
SouthCoast	91	Support	Implement all of the excellent ideals espoused in	Identify and recognise the resources of the Otago	Support	No reason given	No change

Fonterra Co-operative Group Limited	99	Amend	<ul style="list-style-type: none"> • 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. • 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. • Create additional provisions which specifically relate to regionally significant industry. These can adopt the model used in relation to regionally and nationally significant infrastructure. • Include more explicit provisions that recognise and provide for natural and physical resources to be used for the benefit of the social and economic well-being of the community. 	<ul style="list-style-type: none"> • Formally supports RPS, subject to the amendments listed. • “Good water quality” and circumstances where water quality might be “degraded” are not defined, similar for air. • No clear and evidential basis for policies which require specific actions in terms of maintaining or enhancing the quality of air or water. • 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. • PRPS lacks clarity in terms of the issues that need to be addressed and the direction that should be followed to address them. • There is little narrative to explain the relationship between outcomes and the issues that are of regional significance. • Little overall direction in terms of how a natural or physical resource is to be managed. 	Oppose	<p>Good water quality is defined in the Otago Regional Plan: Water. The RPS doesn't need to repeat this. Is Fonterra seriously suggesting that there is "no clear and evidential basis for policies which require specific actions in terms of maintaining or enhancing the quality of air or water". As with our submission on McKeague Consultancy, point XX, EDS vs King Salmon applies to National Policy Statements.</p>	<p>Maintain proposed version of RPS, subject to changes sought in F&G's initial submission</p>
Bronna Brown	101	Support	<p>I support all references to the Treaty of Waitangi and all consultations with tangata whenua Ngai Tahu included in this document.</p>	<p>No reasons given.</p>	Support	<p>Fish and Game strongly support the references to the Treaty of Waitangi and tangata whenua values</p>	<p>No changes sought</p>

Waitaki Irrigators Collective Limited	113	Amend	Reconsider the use of the word "avoid" throughout the PRPS.	<ul style="list-style-type: none"> • Many of the policies may be more restrictive than was (perhaps) intended. • Allow decision-makers some discretion to consider the merits and effects of particular activities and proposals on a case-by-case basis.
Wise Response Society Inc.	114	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).

Oppose

Support

The RPS is not used to assess permitted activities or resource consents. It is used to guide the content of regional and district plans, and Fish and Game's view is that it is set at a high enough level on most matters to provide sufficient ability for the underlying plans to be specific about local matters, given the diversity of catchments, landscapes, and ecosystems in Otago. There are however some matters that relate to finite and overallocated resources that require firm direction from the RPS, and it is the Otago Regional Council's Fish and Game supports the Wise Response Society's request to add a "global issues" section of the RPS for the regional issues that also have a global component. This will provide an important context for the objectives and policies of the RPS

Maintain proposed version of RPS, subject to changes sought in F&G's initial submission

Support Wise Response Society's request

Wise Response Society Inc.	114	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.	Support	The setting of limits to protect resources is done in part for freshwater, however, the proposed RPS does not mention the need to phase out overallocation or the ORC's existing process of setting minimum flows and allocation regimes for catchments. Fish and Game's submission has sought to rectify these omissions, and as such, Fish and Game considers that Wise Response's request is similar to ours	Support Wise Response Society's request
Wise Response Society Inc.	114	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"> Fragmented habitats are not sustainable, and ecosystem components cannot be managed in isolation. Sustainable management and ecosystem protection must be a cornerstone of practice right across the region if our region is to have a strong future. 	Support	Parts of the RPS appear to relate only to significant resources, for which the RPS does not define a test, whilst other parts relate to all of Otago.	Fish and Game would like to see the significance tests removed, and where significance tests are to be applied, for these to provide an extra level of guidance.
Wise Response Society Inc.	114	Amend	Add more specific reference to the precautionary principle.	Applaud the inclusion of a precautionary approach in the Plan.	Support	No reason given	Support Wise Response Society's request

Federated Farmers of New Zealand	115	Amend	<p>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.</p>	<ul style="list-style-type: none"> • Insufficient recognition of the economic benefits derived from natural resource use. • The RPS should explicitly state the importance of the primary production sector to achieving the desired outcomes. <ul style="list-style-type: none"> • A region rich in economic, social and cultural terms is more able to deliver good environmental outcomes. • 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. • Otago lacks the additional and complementary economic development strategy, and it falls to the RPS to deliver this 	Support in part	<p>Fish and Game supports Federated Farmers desire to see agriculture's contribution across the four well-beings measured, particularly where farmers are working to improve water quality and quantity in catchments . However, it is not the job of the RPS to become an economic or regional development strategy for Otago.</p>	<p>Support further detail being added to outline farmer's contributions to those four well-beings, particularly if there is an environmental or freshwater component to that. Unfortunately Fish and Game can't support the RPS becoming an economic or regional development strategy, although there is a need for that in Otago.</p>
Federated Farmers of New Zealand	115	Amend	<ol style="list-style-type: none"> 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 implications for the region's resource use. 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. 	<ol style="list-style-type: none"> 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. <ul style="list-style-type: none"> • An 'issues-based' focus ensures there are direct linkages to the policies and methods and the key issues the plan is seeking to address. • Re-phrasing of the four outcomes as key issues will provide better clarity. 2) The choice of words is important in higher level planning statements. <ul style="list-style-type: none"> • In King Salmon, the use of the word "avoid" was found to mean "not allow" or "prevent the occurrence of." 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; <ul style="list-style-type: none"> • The proposed RPS is prescriptive and diminishes the potential for innovation. 	Support in part	<p>Fish and Game proposes the reinsertion of a list of regionally significant issues, in accordance with s62(1)(a) of the Act. This would go some way towards addressing the concerns raised by Federated Farmers. For the matter of the interpretation of "avoid", the King Salmon case applies to the interpretation of national policy statements, rather than regional policy statements. As such, Fish and Game does not support the revision of those terms as requested by Federated Farmers. Also, Fish and Game does not consider this RPS to</p>	<p>Fish and Game can support the reinclusion of a list of regionally significant issues into the RPS, but it can't support any further relief sought by Federated Farmers on this submission point.</p>

AgResearch Ltd	116	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"> • 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. • Specific relief is sought in the balance of this submission and any further submission that may be made. • Submitter would accept words to like effect or as otherwise may be required to ensure 	Support		
Landscape Connections Trust	123	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.	Support in part	Support in so far that the protection of indigenous biodiversity is consistent with Fish and Game's proposed amendments and section 7(h) of the Act to ensure that all habitats of freshwater species, including trout and salmon, are protected, except where detrimental to native fish.	No changes are necessary
Horticulture New Zealand	124	Support	<ul style="list-style-type: none"> • Support the fact the RPS is a high level strategy. • Particularly supportive of the recognition of controlling the adverse effects of pest species. • Make amendments to better recognise the importance of food production in the Otago region. 	<ul style="list-style-type: none"> • Biosecurity and prevention of introduction of unwanted organisms that are a threat to horticultural crops is a key issue for growers. 	Support	Support	No changes are necessary

Oceana Gold (New Zealand) Limited	140	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"> • Due to the King Salmon case, drafting of provisions need greater precision. • 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. • 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. • 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. • Provisions of Policy 4.5.6 relating to mineral and gas exploration, extraction and processing do not overcome this difficulty. 	Oppose	EDS v Marlborough District Council (the King Salmon) case refers to national policy statements rather than regional policy statements	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission
Ravensdown Works Limited	143	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.	Oppose	EDS v Marlborough District Council (the King Salmon) case refers to national policy statements rather than regional policy statements	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission
Ravensdown Works Limited	143	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"> • These terms are very subjective and not defined. It would be helpful if the actual "values" and "outcomes" referred to were identified. • 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. 	Support in part		Further explanation on what "values", and "outcomes" are.
Upper Clutha Conservation Taskforce	144	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.	Support in part		Further explanation on what "values", and "outcomes" are.

Remarkables Park Limited and Queenstown Park Limited	147	Amend	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> 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? What is meant by 'highly valued' and how does this relate to Part 2 matters of national importance? The policies instead seem to be managing effects on all Otago's natural and physical resources. 	Oppose	<p>The particular clauses of Section 30 of the Act can't be read in isolation to one another. (b) only applies to the control of land issues that are of regional significance. (a), and (c) apply to all natural and physical resources in a region</p>	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission
Straterra	151	Amend	<ul style="list-style-type: none"> Deletion of the word "protect" where it occurs and replaced with "maintain". The addition of remedy or mitigate wherever sole reference is made to avoiding adverse effects. Replace "minimise" with "avoid, remedy or mitigate". 	<ul style="list-style-type: none"> 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. 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. The term "minimise" is unhelpful because it is imprecise. Does it mean minimise to zero? Or to some other arbitrary level? 	Support in part	<p>Fish and Game supports the deletion of the word "minimise" where it occurs and seeks a replacement with a suitable synonym, such as "avoid", "remedy", or "mitigate". Fish and Game's submission sought these changes. Fish and Game does not support the relief sought on economic development proposals.</p>	Make the changes as sought in Fish and Game's initial submission to remove the term "minimise" and replace it with a more suitable word.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	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.	Support	Fish and Game supports the relief sought by na runanga	Include changes as requested by Ngai Tahu

Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	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.	Support	Fish and Game supports the relief sought by na runanga	Include changes as requested by Ngai Tahu
Central Otago District Council	37	Amend	State the significant resource management issues for the Otago region.	<ul style="list-style-type: none"> • 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. • In the absence of those issues, the PRPS advances policies and methods which are best determined at a local and not regional level. 	Support	Fish and Game's submission sought the reinclusion of a list of regionally significant issues, in accordance with section 62(1)(b) of the Act	Reinsert a list of regionally significant issues
Herbert Heritage Group	41	Amend	<ul style="list-style-type: none"> • Insert a "Significant Resource Management Issues for Otago" section between Part A and Part B. • include: <ul style="list-style-type: none"> - Water over-allocation and degradation - both water quality and quantity; - Biodiversity loss and habitat degradation; - Coastal ecosystem health (especially that of estuaries and wetlands); - Climate change impacts (especially sea level rise); as significant resource management issues for Otago.	<ul style="list-style-type: none"> • Horrified at the degradation of our rivers. • No longer able to swim and drink from rivers such as the Kakanui, where family swam and picnicked by 20 years ago. • The Waitaki District Council's biodiversity strategy shows that something needs to be done now to prevent species extinction and restore ecosystems. 	Support	Fish and Game's submission sought the reinclusion of a list of regionally significant issues, in accordance with section 62(1)(b) of the Act	Reinsert a list of regionally significant issues
Forest and Bird NZ	98	Oppose	<ul style="list-style-type: none"> • 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). • 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. 	<ul style="list-style-type: none"> • The issues do not provide a clear direction for the focus of objectives and policies, and don't satisfy RMA requirements. • Non-specific objectives fails to facilitate a level of detail needed to achieve integrated management. • Unclear purpose or status is of the narrative paragraphs in Objectives. • Many policies fail to describe how the objective is to be achieved. 	Support	Fish and Game's submission sought the reinclusion of a list of regionally significant issues, in accordance with section 62(1)(b) of the Act	Reinsert a list of regionally significant issues

Upper Clutha Conservation Taskforce	144	Amend	Explicitly identify resource management issues including: • Degradation of water quality • Biodiversity loss and habitat degradation.	The resource management issues of the region are not adequately identified as required by S62 of the RMA.	Support	Fish and Game's submission sought the reinclusion of a list of regionally significant issues, in accordance with section 62(1)(b) of the Act	Reinsert a list of regionally significant issues
Dunedin City Council	156	Amend	• Ensure that there is a more comprehensive identification and	• Identification of RSIs is required under s32 of the RMA.	Support	Fish and Game's submission sought the reinclusion of a list of regionally significant issues, in accordance with section 62(1)(b) of the Act	Reinsert a list of regionally significant issues
Yellow-eyed Penguin Trust	63	Support	Support.	• Strongly endorse the statement that "A thriving and healthy natural environment is vital to	Support		
Federated Farmers of New Zealand	115	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.	Support in part	The role of an RPS is not that of an economic development strategy, but where farming and agriculture fulfil an environmental function, such as pest or weed control, this should be stated	Amend the introduction to include the positive environmental effects (current and future effects) of farming and agriculture, in partial support of Federated Farmers submission.
Straterra	151	Amend	Support [Overview,] subject to amendment (to third paragraph on p. 3, after "wild environments" add): "outstanding and wild environments, abundant natural resources, prosperity..."	Otago's environments include natural resources, and warrant specific mention.	Oppose	The role of an RPS is not that of an economic development strategy	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission, and do not include the proposed wording of "abundant natural resources, prosperity"

Straterra	151	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, as does mining for <u>gold and other minerals, including aggregates</u> . However, <u>Tourism</u> now provides more than a quarter of Otago's Gross Domestic Product – the highest rate in New Zealand."	<ul style="list-style-type: none"> • Otago was built on mining. The RPS should place more emphasis on the recognition of this fact. • 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. 	Support in part	The role of resource extraction, although the jurisdiction for some of these activities are under the Crown Minerals Act 1991, should be mentioned in the RPS if agriculture receives a mention.	Amend as requested
Te Runanga o Moeraki, Kati Huirapa	154	Amend	Amend 3rd paragraph as follows: "Human activity has left its mark on the landscape, including Maori	Kai Tahu, Kati Mamoe and Waitaha imprint on the landscape is broader than archaeological sites	Support		
Dunedin City Council	156	Amend	Provide further guidance on where an RPS sits	For further guidance on the RPS to include the	Support		
Dunedin City Council	156	Amend	<u>Include a description of the geographical</u>	<u>People are an important part of the Otago region.</u>	Support		
Yellow-eyed Penguin Trust	63	Amend	• 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".	<ul style="list-style-type: none"> • Support the assertion that "Society relies heavily on the systems and services of the natural environment" • We should be seeking to strengthen the natural environment to withstand shocks of various kinds such as climate change. • Support the approach of enabling people "to use and enjoy our natural and built environment"(...) "while ensuring that resources are sustained". 	Support		
Fonterra Co-operative Group Limited	99	Amend	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 a activities that require access</u> to natural and physical resources. In particular, regionally	<ul style="list-style-type: none"> • The PRPS requires a restructure to clearly identify regionally significant values and issues, and the objectives that address those and achieve sustainable management. • 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. • It does not explain what the significance of "Agriculture" being one of the region's 	Oppose		

AgResearch Ltd	116	Oppose	<ul style="list-style-type: none"> Identify "regionally significant issues" instead of "outcomes". 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> 	<ul style="list-style-type: none"> 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. None of the four identified "Outcomes" focus on encouraging future economic growth within the Otago Region. 	Oppose	The role of an RPS is not that of an economic development strategy	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission, and do not include the proposed wording of "abundant natural resources, prosperity"
Oceana Gold (New Zealand) Limited	140	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.	Oppose		
Oceana Gold (New Zealand) Limited	140	Amend	Retain "People are able to use and enjoy our natural and built	It is important to recognise that individual and community wellbeing to a large extent is based	Oppose		
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Amend	Reword the Kai Tahu pillar and accompanying narrative: "Kai Tahu values, rights and interests are protected upheld and the expression of kaitiakitaka is expressed enabled.	This key Kai Tahu 'Pillar' and the accompanying Treaty narrative need to be actively	Support	Support	
Dunedin City Council	156	Amend	Amend text as follows: Otago has high quality natural resources and ecosystems. Society relies heavily on the systems and services of the natural environment <u>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,</u> [describe what makes Otago unique here]. This chapter addresses our fundamental reliance on natural resources and ecosystem services to <u>sustain us, our way of life, cultural identity and our</u>	<ul style="list-style-type: none"> 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). 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. 	Support in part	Support provided that amendments sought by the DCC do not conflict with the changes sought by Fish and Game to this section, which were designed to more adequately reflect intrinsic values.	
Federated Farmers of New Zealand	115	Support	Retain as drafted.	<ul style="list-style-type: none"> 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. 	Support	Support	

Te Runanga o Moeraki, Kati Huirapa	154	Amend	Amend the 1st paragraph as follows: "Kai Tahu considered that the Treaty bound	Amendment would succinctly capture the mutual obligations that the Treaty imposes on	Support	Support
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Amend	<ul style="list-style-type: none"> 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 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.</u>" insert after this paragraph the Runaka map from the Manawhenua section on page 9. 	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.	Support	Support
Te Runanga o Moeraki, Kati Huirapa	154	Amend	New paragraph: " <u>The interests of the Otago runaka are given</u>	Text relocated from the Manawhenua section.	Support	Support
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou	154	Amend	Reword the following paragraph: "In addition, there are whanau ropu (whanau grouping) associated with the papatipu runaka, located predominantly in traditional coastal settlements, p	Reference to whanau ropu should be deleted from this section, but retained within Schedule 18, as not a separate group in the iwi structure.	Support	Support
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou	154	Amend	Delete the following paragraph: "Seasonal trips would be made from the coastal settlements to inland Otago to visit relations, harvest	To assist the restructuring of this section for clarity.	Support	Support
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki	154	Amend	Reword the final paragraph of this section: "The papatipu runaka consultancy services, Kai Tahu Ki	To clarify who Kai Tahu ki Otago and Te Ao Marama represent.	Support	Support

Central Otago District Council	37	Oppose	Delete Schedule 3.	<ul style="list-style-type: none"> • A standard mechanism for assessing significance of adverse effects is a de facto rule and is inappropriate in the RPS. • The mechanism will impose ongoing costs as local resource consents will have to address all the matters in Schedule 3. • There is a danger of omission by focusing on the matters listed in Schedule 3. • Significance of adverse effects must have regard to the relevant provisions of the RMA and plans and the environment under consideration. 	Oppose	Schedule 3 is a helpful tool for determining the significance of adverse effects. It does not form a de-facto rule, however, it does require TLAs to include it or a derivation of it within district plans	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Contact Energy Limited	74	Amend	Amend "1. Nature of Effect", to read as follows: "A detailed description of the effect that is occurring or might <u>reasonably</u> be expected to occur...."	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.	Oppose	Schedule 3 is a helpful tool for determining the significance of adverse effects. It does not form a de-facto rule, however, it does require TLAs to include it or a derivation of it within district plans	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Royalburn Farming Company Ltd	102	Oppose	<ul style="list-style-type: none"> • Delete; or • 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.: "• 11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly 	<ul style="list-style-type: none"> • The practicality of applying Schedule 3 efficiently is very questionable. • The S32 report does not evaluate Schedule 3. • Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant. • Schedule 3 criteria are broad, unhelpful, and inconsistent with case law. 	Oppose	Schedule 3 is a helpful tool for determining the significance of adverse effects. It does not form a de-facto rule, however, it does require TLAs to include it or a derivation of it within district plans	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Walter Peak Station	103	Oppose	<ul style="list-style-type: none"> • Delete; or • 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"> "• 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. • 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. • 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." 	<ul style="list-style-type: none"> • The practicality of applying Schedule 3 efficiently is very questionable. • The S32 report does not evaluate Schedule 3. • Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant. • Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.
Millbrook Country Club	104	Oppose	<ul style="list-style-type: none"> • Delete; or • 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"> "• 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. • 12. Environmental Context: The degree of change in 	<ul style="list-style-type: none"> • The practicality of applying Schedule 3 efficiently is very questionable. • The S32 report does not evaluate Schedule 3. • Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant. • Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.

Oppose

Schedule 3 is a helpful tool for determining the significance of adverse effects. It does not form a de-facto rule, however, it does require TLAs to include it or a derivation of it within district plans

Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Oppose

Schedule 3 is a helpful tool for determining the significance of adverse effects. It does not form a de-facto rule, however, it does require TLAs to include it or a derivation of it within district plans

Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Eastburn Farm	105	Oppose	<ul style="list-style-type: none"> • Delete; or • 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"> "• 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. • 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. • 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." 	<ul style="list-style-type: none"> • The practicality of applying Schedule 3 efficiently is very questionable. • The S32 report does not evaluate Schedule 3. • Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant. • Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.
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Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

RCL Queenstown PTY Ltd	106	Oppose	<ul style="list-style-type: none"> • Delete; or • 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"> • 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. • 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. • 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." 	<ul style="list-style-type: none"> • The practicality of applying Schedule 3 efficiently is very questionable. • The S32 report does not evaluate Schedule 3. • Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant. • Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.
Damper Bay Estates Ltd	107	Oppose	<ul style="list-style-type: none"> • Delete; or • 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 	<ul style="list-style-type: none"> • The practicality of applying Schedule 3 efficiently is very questionable. • The S32 report does not evaluate Schedule 3. • Schedule 3 criteria are insufficient to capture all the variables that should be considered when

Oppose

Schedule 3 is a helpful tool for determining the significance of adverse effects. It does not form a de-facto rule, however, it does require TLAs to include it or a derivation of it within district plans

Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Oppose

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Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Halfway Bay Station	108	Oppose	<ul style="list-style-type: none"> • Delete; or • 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"> "• 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. • 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. • 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." 	<ul style="list-style-type: none"> • The practicality of applying Schedule 3 efficiently is very questionable. • The S32 report does not evaluate Schedule 3. • Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant. • Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.
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Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Water Tight Investments Ltd	109	Oppose	<ul style="list-style-type: none"> Delete; or 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"> 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. 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. 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." 	<ul style="list-style-type: none"> The practicality of applying Schedule 3 efficiently is very questionable. The S32 report does not evaluate Schedule 3. Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant. Schedule 3 criteria are broad, unhelpful, and inconsistent with case law. 	Oppose	<p>Schedule 3 is a helpful tool for determining the significance of adverse effects. It does not form a de-facto rule, however, it does require TLAs to include it or a derivation of it within district plans</p>	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Director-General of Conservation	117	Support	Retain as notified.	Schedule 3 is a helpful tool for determining the significance of adverse effects.	Support	Support	
Environmental Defence Society Incorporated	127	Amend	<ul style="list-style-type: none"> 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 3 should identify that "size" can refer to an activity located in a single area or multiple pockets of activities. Consideration 9 should identify how well the area can absorb change. 	<ul style="list-style-type: none"> 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. 	Support	Support	

Soho Basin Skifield Limited	129	Oppose	<ul style="list-style-type: none"> • Delete; or • 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"> "• 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. • 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. • 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." 	<ul style="list-style-type: none"> • The practicality of applying Schedule 3 efficiently is very questionable. • The S32 report does not evaluate Schedule 3. • Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant. • Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.
Northlake Investments Limited	130	Oppose	<ul style="list-style-type: none"> • Delete; or • 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"> "• 11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly 	<ul style="list-style-type: none"> • The practicality of applying Schedule 3 efficiently is very questionable. • The S32 report does not evaluate Schedule 3. • Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant. • Schedule 3 criteria are broad, unhelpful, and inconsistent with case law.

Oppose

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Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Oppose

Schedule 3 is a helpful tool for determining the significance of adverse effects. It does not form a de-facto rule, however, it does require TLAs to include it or a derivation of it within district plans

Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Shotover Country Limited	131	Oppose	<ul style="list-style-type: none"> • Delete; or • 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"> "• 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. • 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. • 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." 	<ul style="list-style-type: none"> • The practicality of applying Schedule 3 efficiently is very questionable. • The S32 report does not evaluate Schedule 3. • Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant. • Schedule 3 criteria are broad, unhelpful, and inconsistent with case law. 	Oppose	Schedule 3 is a helpful tool for determining the significance of adverse effects. It does not form a de-facto rule, however, it does require TLAs to include it or a derivation of it within district plans	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Ayrburn Farm Developments Limited	132	Oppose	<ul style="list-style-type: none"> • Delete; or • Amend so it is consistent with case law and insert new 	<ul style="list-style-type: none"> • The practicality of applying Schedule 3 efficiently is very questionable. • The S32 report does not evaluate Schedule 3. 	Oppose	Schedule 3 is a helpful tool for determining the significance of adverse effects. It does not form a de-facto rule, however, it does require TLAs to include it or a derivation of it within district plans	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Bridesdale Farm Developments Limited	133	Oppose	<ul style="list-style-type: none"> • Delete; or • 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"> "• 11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly 	<ul style="list-style-type: none"> • The practicality of applying Schedule 3 efficiently is very questionable. • The S32 report does not evaluate Schedule 3. • Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant. • Schedule 3 criteria are broad, unhelpful, and inconsistent with case law. 	Oppose	Schedule 3 is a helpful tool for determining the significance of adverse effects. It does not form a de-facto rule, however, it does require TLAs to include it or a derivation of it within district plans	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Glencoe Station Limited	134	Oppose	<ul style="list-style-type: none"> Delete; or 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"> 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. 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. 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." 	<ul style="list-style-type: none"> The practicality of applying Schedule 3 efficiently is very questionable. The S32 report does not evaluate Schedule 3. Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant. Schedule 3 criteria are broad, unhelpful, and inconsistent with case law. 	Oppose	<p>Schedule 3 is a helpful tool for determining the significance of adverse effects. It does not form a de-facto rule, however, it does require TLAs to include it or a derivation of it within district plans</p>	<p>Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.</p>
Treble Cone Investment Limited	135	Oppose	<ul style="list-style-type: none"> Delete; or 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 	<ul style="list-style-type: none"> The practicality of applying Schedule 3 efficiently is very questionable. The S32 report does not evaluate Schedule 3. Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant. 	Oppose	<p>Schedule 3 is a helpful tool for determining the significance of adverse effects. It does not form a de-facto rule, however, it does require TLAs to include it or a derivation of it within district plans</p>	<p>Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.</p>
Woodlot Properties Limited	136	Oppose	<ul style="list-style-type: none"> Delete; or 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"> 11. Ability for offsetting or compensation: The extent to which the adverse effect can be directly 	<ul style="list-style-type: none"> The practicality of applying Schedule 3 efficiently is very questionable. The S32 report does not evaluate Schedule 3. Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant. Schedule 3 criteria are broad, unhelpful, and inconsistent with case law. 	Oppose	<p>Schedule 3 is a helpful tool for determining the significance of adverse effects. It does not form a de-facto rule, however, it does require TLAs to include it or a derivation of it within district plans</p>	<p>Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.</p>

Henley Downs Farm Holdings Limited	137	Oppose	<ul style="list-style-type: none"> Delete; or 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"> 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. 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. 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." 	<ul style="list-style-type: none"> The practicality of applying Schedule 3 efficiently is very questionable. The S32 report does not evaluate Schedule 3. Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant. Schedule 3 criteria are broad, unhelpful, and inconsistent with case law. 	Oppose	Schedule 3 is a helpful tool for determining the significance of adverse effects. It does not form a de-facto rule, however, it does require TLAs to include it or a derivation of it within district plans	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Real Journeys	138	Oppose	<ul style="list-style-type: none"> Delete; or 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"> 11. Ability for offsetting or compensation: The extent to 	<ul style="list-style-type: none"> The practicality of applying Schedule 3 efficiently is very questionable. The S32 report does not evaluate Schedule 3. Schedule 3 criteria are insufficient to capture all the variables that should be considered when determining if an adverse effect is significant. Schedule 3 criteria are broad, unhelpful, and inconsistent with case law. 	Oppose	Schedule 3 is a helpful tool for determining the significance of adverse effects. It does not form a de-facto rule, however, it does require TLAs to include it or a derivation of it within district plans	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Balfance Agri-Nutrients Limited	141	Support	Adopt as notified.	<ul style="list-style-type: none"> Provides clear direction on determining whether an effect is 'significant' in terms of the Proposed RPS. 	Support	Support	
Te Runanga o Moeraki, Kati Huirapa	154	Amend	Change the outcome to: "Kai Tahu values, rights and interests are protected"	This key Kai Tahu "Pillar" needs to be actively worded.	Support	Support	
Te Runanga o Moeraki, Kati Huirapa	154	Amend	Amend the introduction to Outcome 1 as follows: "The availability of	The ability of Kai Tahu to provide for the cultural and economic wellbeing is dependent on access	Support	Support	
Te Runanga o Moeraki, Kati Huirapa	154	Amend	Amend as follows: "Kaitiakitaka is an expression of	To capture the nature of Kaitiakitaka.	Support	Support	

Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou	154	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 evaluation when	Remove references to 'codifying' and focus on the opportunities that a true Treaty partnership offers.	Support	Support	
Te Runanga o Moeraki, Kati Huirapa	154	Amend	• Include a Kai Tahu resource management issues table either within this section or in a schedule.	To assist plan users to understand the resource management issues of significance to Kai Tahu.	Support	Support	
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou	154	Amend	Amend issues as follows: "The mauri (life supporting capacity) and wairua of some places, sites, resources and values of cultural, spiritual or historic significance to takata	To recognise: • The impact of degradation on the mauri and wairua of places, sites, and resources. • Limits on access to sites or resources.	Support	Support	
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki,	154	Amend	Add issues: • "There has been insufficient recognition of iwi man	• To understand the resource management issues of significance to Kai Tahu. • The building of capacity is a prerequisite for	Support	Support	
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki	154	Amend	Amend Policy as follows "Promoting awareness and understanding of the Treaty Partnership obligations	Policy needs to go beyond promoting awareness and to identify the target audience.	Support	Support	Support
Landscape Connections Trust	123	Amend	Clearly identify regionally significant resource management issues, including but not limited to: • water overallocation and degradation	• Section 62 (1) (a) of the Resource Management Act requires the identification of significant resource management issues for the region.	Support	Support	Retain as notified
Landscape Connections Trust	123	Amend	• 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	• Ecosystems are greater than the sum of the "natural and physical resources" and "natural systems" that make them up. • The health of these ecosystems needs to be	Support	Support	Retain as notified
265 Outcome 2 and introduction							
Wise Response Society Inc.	114	Amend	Introduction to Part B Chapter 2: • Rewrite based on the strong sustainability model [see submission for information on this model]. • Establish first concept of social and economic	• Shift the focus of activity away from promoting economic development and financial return to sustainably managing natural and physical resources	Support	Support	
26 Issue 2.1 - Degradation of Otago's natural resources							
Matthew Sole	75	Oppose	Re write the issues relating to Objective 2.1 to specifically address the following: • Cumulative effects of human activities, past and current on natural resources have resulted in loss of resource (e.g. extinct or nearly extinct species	• 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.	Support	Support	
			• Loss and degradation of wetlands. • Degradation and loss of resilience of indigenous ecosystems, through loss of area and fragmentation due to land use change, pests and weeds, climate change. • Loss of natural character along the margins of rivers lakes and the coast, through inappropriate land use and development		Support	Support	

Forest and Bird NZ	98	Amend	Re write the issues to issues that specifically address the following: Objective 2.1 Issues • 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) • Over allocation (both quality and quantity) and degradation of freshwater resources. • Loss of indigenous habitats and species through land intensification and development, clearance of indigenous vegetation, tree planting. • Loss and degradation of wetlands. • Degradation and loss of resilience of indigenous	• The list of issues is overly general, and written to be a general truism for all resources. • The list does not include specific issues affecting specific natural and physical resources that are of regional significance.	Support	Support	
Wise Response Society Inc.	114	Amend	Amend 3rd paragraph as follows: "Cumulative adverse effects of human activities on the	• Strongly agree with the first two paragraphs of the issue statement	Support	Support	
26 Issue 2.2 - Highly valued natural resources							
Yellow-eyed Penguin Trust	63	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).	Support	Support	Retain as notified
Matthew Sole	75	Oppose	Re write the issues associated to Objective 2.2 to specifically address the lack of and inconsistent inventory and identification, recognition and	• The list of proposed issues is general and not specific to Otago's resources. The list does not include specific issues affecting specific natural	Support	Support	Retain as notified
Wise Response Society Inc.	114	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	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.	Support	Support	
267 Need 2.2							
Otago Peninsula Biodiversity Group	40	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.	Support	Support	

Federated Farmers of New Zealand	115	Amend	Amend the need statement associated with Objective 2.2 as follows (or words to similar effect): "It is a matter of national <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.	Maybe oppose?
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269 Need 2.3

Federated Farmers of New Zealand	115	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</u> within resources that span management and administrative unit boundaries, 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.	Support	Support
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29 Objective 2.1 - The values of natural resources are recognised, maintained or enhanced

Matthew Sole	75	Oppose	Re write to read: "The values and life supporting capacity 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.	Support	Support
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Royalburn Farming Company Ltd	102	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural and physical resources are recognised, <u>and protected from inappropriate subdivision</u> , use and development maintained and enhanced ."	<ul style="list-style-type: none"> • Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32. • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. 	Oppose	Oppose the introduction of new significance tests
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Walter Peak Station	103	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural and physical resources are recognised, <u>and protected from inappropriate subdivision</u> , use and development maintained and enhanced ."	<ul style="list-style-type: none"> • Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32. • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. 	Oppose	Oppose the introduction of new significance tests
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Millbrook Country Club	104	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural and physical resources are recognised, <u>and protected from inappropriate subdivision</u> , use and development maintained and enhanced ."	<ul style="list-style-type: none"> • Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32. • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. 	Oppose	Oppose the introduction of new significance tests
Eastburn Farm	105	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural and physical resources are recognised, <u>and protected from inappropriate subdivision</u> , use and development maintained and enhanced ."	<ul style="list-style-type: none"> • Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32. • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. 	Oppose	Oppose the introduction of new significance tests
RCL Queenstown PTY Ltd	106	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural and physical resources are recognised, <u>and protected from inappropriate subdivision</u> , use and development maintained and enhanced ."	<ul style="list-style-type: none"> • Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32. • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. 	Oppose	Oppose the introduction of new significance tests
Damper Bay Estates Ltd	107	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural and physical resources are recognised, <u>and protected from inappropriate subdivision</u> , use and development maintained and enhanced ."	<ul style="list-style-type: none"> • Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32. • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. 	Oppose	Oppose the introduction of new significance tests
Halfway Bay Station	108	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural and physical resources are recognised, <u>and protected from inappropriate subdivision</u> , use and development maintained and enhanced ."	<ul style="list-style-type: none"> • Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32. • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. 	Oppose	Oppose the introduction of new significance tests
Water Tight Investments Ltd	109	Amend	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural and physical resources are recognised, <u>and protected from inappropriate subdivision</u> , use and development maintained and enhanced ."	<ul style="list-style-type: none"> • Diversion from the wording of Part 2 of the RMA needs to be justified in the Section 32. • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. 	Oppose	Oppose the introduction of new significance tests

The Fertiliser Association of New Zealand Inc.	110	Amend	Amend as follows: "The values of Otago's natural and physical resources are recognised, maintained and <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.	Oppose	Oppose the introduction of new significance tests
Wise Response Society Inc.	114	Amend	Amend as follows: " <u>Otago's ecosystems, including their</u>	• The concept of absolute limit, as introduced by the NPS for freshwater, needs to be extended to	Support	Support
30 Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced						
Bruce Lambie	19	Support	Need to protect wetlands.	They are very important in water conservation and water retention.	Support	Support
Central Otago Wilding	49	Support	Support.	Support the general tenor of these policies.	Support	Support
Central Otago	59	Amend	Remove distinction of "indigenous" when using	Both indigenous and introduced species possess	Support	Support
Guardians of Lake Wanaka and	73	Amend	Merge policies 2.1.1 and 2.1.2 and their two action lists into a single more meaningful policy.	• Given that the beds and margins of rivers and lakes, wetlands are an integral component of the	Support	Support
Matthew Sole	75	Amend	Compile assessment frameworks of desired common values/attributes for Water quality, Air,	No reason given.	Support	Support
Darby Planning LP	81	Oppose	<ul style="list-style-type: none"> Delete policies 2.1.1 and 2.1.2 and add a new policy as follows: <ul style="list-style-type: none"> " <u>Recognise the values of freshwater, and the beds of rivers, lakes, wetlands, and their margins, and manage them to:</u> a) <u>Protect outstanding water bodies and wetlands; and</u> b) <u>Maintain or enhance the natural functioning of rivers, lakes, and wetlands, their riparian margins, and aquifers; and</u> c) <u>Maintain ecosystem health and indigenous biodiversity; and</u> d) <u>Retain the range and extent of habitats provided</u> 	<ul style="list-style-type: none"> 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. 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. 	Oppose	Maintenance of values is simply not sufficient when there are many rivers and streams in Otago where these values have been heavily impacted and degraded.

Meridian Energy Limited	82	Oppose	Delete policies 2.1.1 and 2.1.2 and add the following new policy: "Recognise the values of freshwater, and the beds of rivers, lakes, wetlands, and their margins, and manage them to:	<ul style="list-style-type: none"> • 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. • The "protection" requirement in these clauses is too high a test and does not give effect 	Oppose	Maintenance of values is simply not sufficient when there are many rivers and streams in Otago where these values have been heavily impacted and degraded.
			<ul style="list-style-type: none"> a) <u>Protect outstanding water bodies and wetlands; and</u> b) <u>Maintain or enhance the natural functioning of rivers, lakes, and wetlands, their riparian margins, and aquifers; and</u> c) <u>Maintain ecosystem health and indigenous biodiversity; and</u> d) <u>Retain the range and extent of habitats provided by freshwater; and</u> e) <u>Maintain migratory patterns of freshwater species, unless detrimental to indigenous biodiversity; and</u> f) <u>Maintain or enhance natural character; and</u> g) <u>Avoid aquifer compaction and seawater intrusion</u> 	<p>to the NPS on Freshwater Management.</p> <ul style="list-style-type: none"> • 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. • 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 	Oppose	Maintenance of values is simply not sufficient when there are many rivers and streams in Otago where these values have been heavily impacted and degraded.
Forest and Bird NZ	98	Amend	Add new Policies: <ul style="list-style-type: none"> • "Facilitating and supporting restoration of degraded natural ecosystems and indigenous habitats using where possible indigenous species that naturally occur and/or previously occurred in the area." • "Avoiding fragmentation, reduction in size and 	<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"> • 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 	Support	Support
Fonterra Co-operative Group Limited	99	Amend	Identify values then set measurable limits and targets to achieve overall water quality improvements in freshwater bodies.	<ul style="list-style-type: none"> • 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. • Given its focus on values rather than objectives, Fonterra considers that the PRPS does not give effect to the requirements of the NPSFM. 	Oppose	This is an RPS, not the regional plan: water, and Fonterra's relief is not appropriate in this context.

			<p>follows:</p> <ul style="list-style-type: none"> • Ecosystems and indigenous biodiversity: Policy 2.1.1 Managing for ecosystem and indigenous biodiversity value; • Geomorphology & landscape: Policy 2.1.2 Recognising the values of natural features, landscapes and seascapes; • Coastal environment: Policy 2.1.3 Managing the 	socio-economic system can exist.	Support	Support
Clutha Agricultural Development Board	126	Support	<ul style="list-style-type: none"> • General support of Policies 2.1.1, 2.1.2 and 2.1.3. • Use a qualifier to outline what "degradation" means, and / or define "degradation" in the RPS Glossary. 	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?	Support in part	If a non-limited schedule of what constitutes a "degraded" waterway could be developed, Fish and Game would be supportive. Degradation is multi-faceted.
Remarkables Park Limited and	147	Amend	That consideration is given to the wording of policies and whether they can be improved to	Submitter queries why various policies aim for maintenance of ecosystem health, indigenous	Support in part	This needs to be clarified
31 Policy 2.1.1 - Managing for freshwater values						
Karin Bowen	24	Amend	Add: "continued oversight of water quality throughout Otago with initiatives to maintain current water quality levels."	Community concern that land use changes result in decrease in quality of water in rivers and lakes. Oversight and management essential to prevent deterioration.	Support	Support
Egg Producers Federation of New Zealand	29	Amend	An additional sub-clause be added to Policy 2.1.1: "Policy 2.1.1g) - <u>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"> • Supports the recognition that Otago's economy depends on its natural resources, such as water for food production. • Agrees with the intention of Policy 2.1.1. • Stock drinking water is not specifically provided for under this policy. • The availability of water is a fundamental issue for rural production activities. 	Support	The relief sought is similar to Fish and Game's relief to ensure that drinking water and stock water supplies are maintained or enhanced

Alec Saunders	35	Amend	Add an additional paragraph: <u>(g) "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"> • 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. • 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. 	Support	Support
Herbert Heritage Group	41	Amend	• Amend Policy 2.1.1 a) as follows: Support healthy ecosystems in all Otago aquifers, Protect and maintain healthy ecosystems and rest	<ul style="list-style-type: none"> • Horrified at the degradation of our rivers. • No longer able to swim and drink from rivers such as the Kakanui, where took his family swim 	Support	Support
Phil Murray	42	Amend	• Include a clearer definition of "good water quality" in Policy 2.1.1(f) • Delete "important" from Policy 2.1.1(l)	<ul style="list-style-type: none"> • As proposed, "good water quality" seems to be an undefined quality. Some standard or description of the meaning of "good" would give more confidence. 	Support	Support
Michael Rawlinson	45	Support	Support health freshwater habitat and sustainability.		Support	Support
Lynne Stewart	47	Amend	• 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	<ul style="list-style-type: none"> • Some standard or description of the meaning of "good" would give more confidence. • All recreation values should be protected. As proposed, Policy 2.1.1(f) requires us to 	Support	Support
The Southern District Health Board	51	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	Support in part	Fish and Game's relief on this point seeks enhancement as well
Alliance Group Limited	56	Amend	Amend as follows: "Recognise freshwater values, and manage freshwater, to: ... c) Protect <u>the values of</u> outstanding water bodies and wetlands; and ... i) <u>Protect provide for Kai Tahu values; and</u>	<ul style="list-style-type: none"> • Amend so that it suitably recognises and provides for the development and growth of infrastructure that relies on fresh water resources. • The policy also needs to recognise the use of <u>freshwater in providing for the social and</u> 	Support	Support
Yellow-eyed Penguin Trust	63	Support	Support but define healthy ecosystems clearly.	<ul style="list-style-type: none"> • Support objective to "support healthy ecosystems" 	Support	Support
Guardians of Lake Hawea			part of ORC's intent. • Acknowledge explicitly issues of assessing status of and managing freshwater biodiversity	with meaningful operational plans by ORC then we can expect to see some major improvements in how Otago's freshwater ecosystems are	Support	Support

Contact Energy Limited	74	Amend	<ul style="list-style-type: none"> • In c), insert a cross reference to Policy 2.2.12. • Amend d) to read: "Protect <u>current</u> migratory patterns..." • 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</u> 	<ul style="list-style-type: none"> • The values provided for in Policy 2.1.1 are broadly expressed and require some clarification or qualification to "manage" freshwater to achieve them: • The meaning of "oustanding" water body needs clarification; • Natural processes and their effects need to be 	Oppose	Oppose a downgrade in this policy
Matthew Sole	75	Amend	<ul style="list-style-type: none"> • Re-name policy to read: "Managing for healthy freshwater ecosystems". • Amend a) to read: "a) Ensure healthy ecosystems in all Otago water bodies and their margins." • Amend b) to read: "b) Retain the <u>full natural</u> range of habitats and indigenous species supported by freshwater." • Retain (c) and (e) - (k) and their margins. • Refer to "restore good quality where degraded" in f). • 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." • Amend l) to read: "l) Protect recreation values". • Refer also to water bodies and their margins in m). • Add the following items to the policy: " <u>g) Avoid human induced erosion and sedimentation</u> r) Ensure all water bodies are safe for human health and contact recreation. s) <u>Avoid changes in hydrology which could adversely</u> 	<ul style="list-style-type: none"> • Header: The policy creates ambiguity as freshwater values are not defined, and can be conflicting. • 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. • 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. • d): The terminology migratory patterns are imprecise and could be more related to behaviour than protecting the habitat requirements for all life cycle stages. • l): The RPS does not define important recreational values; this is a superfluous and restricting qualifier. • Additional items to address the issues relating to the degradation and over allocation of freshwater resources. 	Support in part	Relief point (s) is contrary to the relief sought in (d) and could result in a degradation of water quality and quantity
Trustpower Limited	85	Amend	<p>Amend as follows: "Recognise freshwater values, and manage freshwater, to: ...</p> <p>c) Protect the values of outstanding water bodies and</p>	<ul style="list-style-type: none"> • Amend so that it suitably recognises and provides for the development and growth of infrastructure that relies on fresh water resources. • The policy also needs to recognise the use of freshwater in providing for the social 	Oppose	Fish and Game opposes the relief sought by Trustpower on this point, especially the removal of Kai Tahu values, other cultural values, and to rewrite the policy to "enable" further hydroelectric development. This policy is for freshwater protection.

McKeague Consultancy Ltd	89	Amend	<ul style="list-style-type: none"> • Amend to provide greater clarity on how the [Water Plan's] Regionally Significant Wetlands fit with the concept [in Policy 	<ul style="list-style-type: none"> • Unclear how "outstanding water bodies / wetlands" compare with Regional Plan: Water's regionally significant wetlands. • Clause d) gives indigenous biodiversity greater 	Support in part	Fish and Game supports the need to clarify the responsibility for the adverse effects of pest
Forest and Bird NZ	98	Amend	<ul style="list-style-type: none"> • Re name title to read: • "Managing for healthy freshwater ecosystems", or • "Achieve healthy freshwater ecosystems" • Amend introductory text accordingly • Amend (a) to read: "Ensure all water bodies and their margins have healthy ecosystems; and" • Amend (b) to read: "Retain the <u>full</u> range of habitats and indigenous species supported by freshwater." • Retain (c) and (e) - (k) 	<ul style="list-style-type: none"> • The policy creates ambiguity as freshwater values are not defined, and can be conflicting. • a) Strongly support managing for healthy ecosystems in all Otago water bodies and their margins. • 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. • 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. 	Support	Support
Fonterra Co-operative Group Limited	99	Oppose	<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • 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. • Methods 1, 3 and 7, provide no indication of the matters to be addressed, or priorities among the matters listed in the Policy. • Policy needs to signal that the definition of management units is an essential procedural step. 	Oppose	<p>Fish and Game opposes the relief sought by Fonterra. The RPS is not the regional water plan, which is the appropriate place to contain both the objectives and policies for determining the lists of freshwater values as well as the lists of the values themselves.</p> <p>Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.</p>

Royalburn Farming Company Ltd	102	Amend	<p>Amend Policy as follows: "Recognise <u>regionally 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, unless detrimental to indigenous biodiversity</u>; 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"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS should be focused on resource management issues of regional significance. 	Oppose	<p>The role of the RPS, under s60(1)(a) is to provide objectives and policies to manage all natural and physical resources in a region, as well as to specify those regionally significant resources. Therefore, limiting the policy to just regionally significant issues is inconsistent with the Act. The other changes sought merely repeat the Act.</p>
Walter Peak Station	103	Amend	<p>Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to:</p> <p>...</p> <p>c) Protect outstanding water bodies and wetlands from</p>	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS should be focused on resource management issues of regional significance. 	Oppose	<p>The role of the RPS, under s60(1)(a) is to provide objectives and policies to manage all natural and physical resources in a region, as well as to specify those regionally significant resources. Therefore, limiting the policy to just regionally significant issues is inconsistent with the Act. The other changes sought merely repeat the Act.</p>

Millbrook Country Club	104	Amend	<p>Amend Policy as follows: "Recognise <u>regionally 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>	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS should be focused on resource management issues of regional significance.
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Oppose

The role of the RPS, under s60(1)(a) is to provide objectives and policies to manage all natural and physical resources in a region, as well as to specify those regionally significant resources. Therefore, limiting the policy to just regionally significant issues is inconsistent with the Act. The other changes sought merely repeat the Act.

Eastburn Farm	105	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"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS should be focused on resource management issues of regional significance. 	Oppose	The role of the RPS, under s60(1)(a) is to provide objectives and policies to manage all natural and physical resources in a region, as well as to specify those regionally significant resources. Therefore, limiting the policy to just regionally significant issues is inconsistent with the Act. The other changes sought merely repeat the Act.
RCL Queenstown PTY Ltd	106	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 as identified in Schedule	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS should be focused on resource management issues of regional significance. 	Oppose	The role of the RPS, under s60(1)(a) is to provide objectives and policies to manage all natural and physical resources in a region, as well as to specify those regionally significant resources. Therefore, limiting the policy to just regionally significant issues is inconsistent with the Act. The other changes sought merely repeat the Act.
Name	Number	Position	Decision Requested	Reason for Decision Requested		

			1A; and ii) <u>Protect important recreation values</u>	
Damper Bay Estates Ltd	107	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"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS should be focused on resource management issues of regional significance.

Oppose

The role of the RPS, under s60(1)(a) is to provide objectives and policies to manage all natural and physical resources in a region, as well as to specify those regionally significant resources. Therefore, limiting the policy to just regionally significant issues is inconsistent with the Act. The other changes sought merely repeat the Act.

Halfway Bay Station	108	Amend	<p>Amend Policy as follows: "Recognise <u>regionally 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>	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS should be focused on resource management issues of regional significance.
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Oppose

The role of the RPS, under s60(1)(a) is to provide objectives and policies to manage all natural and physical resources in a region, as well as to specify those regionally significant resources. Therefore, limiting the policy to just regionally significant issues is inconsistent with the Act. The other changes sought merely repeat the Act.

Water Tight Investments Ltd	109	Amend	<p>Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to:</p> <p>...</p> <p>c) Protect outstanding water bodies and wetlands from <u>inappropriate subdivision, use and development</u> ; and</p> <p>d) Protect migratory patterns of freshwater species from <u>inappropriate subdivision, use and development</u>, unless detrimental to indigenous biodiversity; and</p> <p>...</p> <p>j) Protect Kai Tahu values from <u>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 from <u>inappropriate subdivision, use and development</u> ; and</p> <p>..."</p>	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS should be focused on resource management issues of regional significance. 	Oppose	<p>The role of the RPS, under s60(1)(a) is to provide objectives and policies to manage all natural and physical resources in a region, as well as to specify those regionally significant resources. Therefore, limiting the policy to just regionally significant issues is inconsistent with the Act. The other changes sought merely repeat the Act.</p>
The Fertiliser Association of New Zealand Inc.	110	Amend	<ul style="list-style-type: none"> • Amend as follows: "Recognise freshwater values, and manage <u>the effects of activities which impact on</u> freshwater, to: • ... 	<ul style="list-style-type: none"> • The policy is unclear as to how freshwater will be managed and it would be more accurate to refer to the management of the effects of activities that could have an impact on freshwater quality and quantity. • Clause c) should be amended to reflect the NPSFM which requires the protection of 	Oppose	Retain

Waitaki Irrigators Collective Limited	113	Amend	<p>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> "</p>	<ul style="list-style-type: none"> • 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. • The use of freshwater for primary production contributes to the social and economic wellbeing. • Primary production is recognised as a value in relation to soils, and the same should apply to freshwater. • Support clause (p). 	Oppose	<p>WIC Limited are correct in saying that some waterbodies are significantly altered, however, it is not the job of the RPS to introduce an appropriateness test. Many submissions from agricultural interests have been opposed to the introduction of unexplained or unclarified tests in the RPS, and introducing another test whilst opposing the existing tests runs counter to these arguments. Similarly, this is a policy designed to protect freshwater resources, not to allocate assimilative capacity for the disposal of contaminants from</p>	<p>Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.</p>
Wise Response Society Inc.	114	Amend	<p>Amend as follows: "Policy 2.1.1 <u>Managing for freshwater ecosystem function and value</u> Managing for freshwater values Recognise freshwater values, and manage freshwater, to: a) <u>Protect and sustain</u> Support 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</u></p>	<ul style="list-style-type: none"> • Suggested b) provides for retainment of infiltration to groundwater beneath urban areas. • Change to p) provides a global context (climate change). • Wording in the Plan needs to be clear and uncompromising. Suggested changes give the plan more teeth by including sustainability indicator. • Need to optimise integration across land, freshwater, estuarine and marine interfaces as a single ecosystem complex. • 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 	Support	<p>Support</p>	<p>Support</p>

Federated Farmers of New Zealand	115	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) Protect Manage and where necessary protect outst anding water bodies and wetlands; and d) Protect Provide for migratory patterns of freshwater species, unless detrimental to indigenous biodiversity; and ... j) Protect Provide for Kai Tahu values; and ... l) Protect Provide for important recreation values; and ..."	<ul style="list-style-type: none"> • New point - The policy insufficiently recognises the benefits (particularly economic and social) derived from resource use. • 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. 	Oppose	Other objectives and policies in the RPS recognise the economic values to be obtained from natural resources. This objective is designed to recognise and protect the intrinsic values of freshwater, and not to blur that protection with other aims, such as economic and social wellbeing that are covered by other objectives and policies in the RPS	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Director-General of Conservation	117	Amend	Amend as follows: "Recognise freshwater values, and manage freshwater, to: a)	<ul style="list-style-type: none"> • 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 for Source of Drinking Water and Section 14(3)(b) of 	Support	Support	Support
Otago Water Resource Users Group	121	Amend	<ul style="list-style-type: none"> • Amend a) as follows: "a) Support healthy ecosystems in all Otago aquifers, and rivers, lakes, wetlands, and their margins; and" • Delete b) and h). • Amend j) as follows: "ProtectProvide for Kai Tahu values; and". • Amend m) as follows: "MaintainProvide for the aesthetic and landscape values of rivers, lakes, and wetlands; and". 	<ul style="list-style-type: none"> • 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. • Clauses b), h) and m) as currently written prevent any further allocation of water for abstraction or damming and storage. • Clauses b) and h) can be deleted as these matters are adequately covered by clause a). • Clause j) as currently written elevates Kai Tahu values above the economic interests of using water. 	Oppose	Oppose, the relief sought is not consistent with section 5 of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Queenstown Airport Corporation	122	Amend	<ul style="list-style-type: none"> • The policy should seek to “provide for” Kai Tahu values (clause j) and remove reference to “other cultural value”. • Amend as follows: “Recognise freshwater values, and manage freshwater, to: ... 	<ul style="list-style-type: none"> • Amend so that it suitably recognises and provides for the development and growth of infrastructure that relies on fresh water resources. • The policy also needs to recognise the use of 	Oppose	Oppose, the relief sought is not consistent with section 5 of the Act	Maintain proposed version of RPS, subject to changes sought in F&G’s initial submission.
Horticulture New Zealand	124	Amend	<ul style="list-style-type: none"> • Amend Policy 2.1.1 as follows: “<u>Identify and</u> recognise freshwater values and manage to: ...” • Add additional point: “<u>q) Provide for food production values.</u>” • Include methods for identification of values. 	<ul style="list-style-type: none"> • 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. • Food production should be recognised as part of managing freshwater. 	Support in part	Freshwater values are identified in the schedules of the regional plan:water, however there may be a need to update and adjust these values. Fish and Game has indicated elsewhere in its submission of the need to update these, and for the RPS to provide amendments to objectives and policies in order to do this. However, food production values are already provided for in Chapter 4	Maintain proposed version of RPS, subject to changes sought in F&G’s initial submission, which include amendments to provide for a process to update the schedules of freshwater values in the regional plan: water, through an RMA Schedule 1 process.
Soho Basin Skifield Limited	129	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</u> <u>inappropriate subdivision, use and development</u> ;	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS should be focused on resource management issues of regional significance. 	Oppose	Other objectives and policies in the RPS recognise the economic values to be obtained from natural resources. This objective is designed to recognise and protect	Maintain proposed version of RPS, subject to changes sought in F&G’s initial submission.

Northlake Investments Limited	130	Amend	<p>Amend Policy as follows: "Recognise <u>regionally 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 from inappropriate subdivision, use</p>	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS should be focused on resource management issues of regional significance. 	Oppose	<p>Other objectives and policies in the RPS recognise the economic values to be obtained from natural resources. This objective is designed to recognise and protect the intrinsic values of freshwater, and not to blur that protection with other aims, such as economic and social well-being that are covered by other objectives and policies in the RPS</p>	<p>Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.</p>
Shotover Country Limited	131	Amend	<p>Amend Policy as follows: "Recognise <u>regionally 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>	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS should be focused on resource management issues of regional significance. 	Oppose	<p>Other objectives and policies in the RPS recognise the economic values to be obtained from natural resources. This objective is designed to recognise and protect the intrinsic values of freshwater, and not to blur that protection with other aims, such as economic and social well-being that are covered by other objectives and policies in the RPS</p>	<p>Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.</p>

Ayrburn Farm Developments Limited	132	Amend	<p>Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to:</p> <p>...</p> <p>c) Protect outstanding water bodies and wetlands from <u>inappropriate subdivision, use and development</u> ; and</p> <p>d) Protect migratory patterns of freshwater species from <u>inappropriate subdivision, use and development</u> , unless detrimental to indigenous biodiversity; and</p> <p>...</p> <p>j) Protect Kai Tahu values from <u>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 from <u>inappropriate subdivision, use and development</u> ; and</p> <p>..."</p>	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS should be focused on resource management issues of regional significance. 	Oppose	<p>Other objectives and policies in the RPS recognise the economic values to be obtained from natural resources. This objective is designed to recognise and protect the intrinsic values of freshwater, and not to blur that protection with other aims, such as economic and social well-being that are covered by other objectives and policies in the RPS</p>	<p>Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.</p>
Bridesdale Farm Developments Limited	133	Amend	<p>Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to:</p> <p>...</p> <p>c) Protect outstanding water bodies and wetlands from <u>inappropriate subdivision, use and development</u> ;</p>	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS should be focused on resource management issues of regional significance. 	Oppose	<p>Other objectives and policies in the RPS recognise the economic values to be obtained from natural resources. This objective is designed to recognise and protect</p>	<p>Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.</p>

Glencoe Station Limited	134	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to:	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. 	Oppose	<p>Other objectives and policies in the RPS recognise the economic values to be obtained from natural resources. This objective is designed to recognise and protect the intrinsic values of freshwater, and not to blur that protection with other aims, such as economic and social well-being that are covered by other objectives and policies in the RPS</p>	<p>Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.</p>
Woodlot Properties Limited	136	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u>	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national 	Oppose	<p>Other objectives and policies in the RPS recognise the economic values to be obtained from natural resources. This objective is designed to recognise and protect the intrinsic values of freshwater, and not to blur that protection with other aims, such as economic and social well-being that are covered by other objectives and policies in the RPS</p>	<p>Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.</p>

Henley Downs Farm Holdings	137	Amend	Amend Policy as follows: "Recognise <u>regionally significant</u>	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national 	Oppose	<p>Other objectives and policies in the RPS recognise the economic values to be obtained from natural resources. This objective is designed to recognise and protect the intrinsic values of freshwater, and not to blur that protection with other aims, such as economic and social well-being that are covered by other objectives and policies in the RPS</p>	<p>Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.</p>
Real Journeys	138	Amend	<p>Amend Policy as follows: "Recognise <u>regionally significant</u> freshwater values, and manage freshwater, to:</p> <p>....</p> <p>c) Protect outstanding water bodies and wetlands from <u>inappropriate subdivision, use and development</u>; and</p> <p>d) Protect migratory patterns of freshwater species from <u>inappropriate subdivision, use and development</u>, unless detrimental to indigenous biodiversity; and</p> <p>....</p> <p>j) Protect Kai Tahu values from <u>inappropriate subdivision, use and development</u>; and</p> <p>k) Provide for other cultural values as identified in Schedule 1A; and</p> <p>l) Protect important recreation values from <u>inappropriate subdivision, use and development</u>; and</p> <p>...."</p>	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS should be focused on resource management issues of regional significance. 	Oppose	<p>Other objectives and policies in the RPS recognise the economic values to be obtained from natural resources. This objective is designed to recognise and protect the intrinsic values of freshwater, and not to blur that protection with other aims, such as economic and social well-being that are covered by other objectives and policies in the RPS</p>	<p>Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.</p>

Oceana Gold (New Zealand) Limited	140	Amend	<ul style="list-style-type: none"> Amend to explain whether there is a priority ranking or how the factors are meant to be balanced against on another. Amend to include a new line item as follows: "<u>g</u>) <u>Protect</u> important economic uses of 'water'". 	<ul style="list-style-type: none"> In light of the King Salmon case, the drafting of policies requires precision. 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? 	Oppose	Other objectives and policies in the RPS recognise the economic values to be obtained from natural resources. This objective is designed to recognise and protect the intrinsic values of freshwater, and not to blur that protection with other aims, such as economic and social well-being that are covered by other objectives and policies in the RPS	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Ballance Agri-Nutrients Limited	141	Amend	Amend as follows: "Recognise freshwater values, and manage freshwater, to: ... f) In accordance with established water objectives, m) Maintain good water quality, including in the coastal marine area, or enhance it where it has been degraded; and ..."	<ul style="list-style-type: none"> Clause 'f' should be linked to 'freshwater management unit targets' associated with the work that is required under the NPSFM. 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. Water quality limits should be socially, economically, as well as environmentally, achievable. Method 3: Regional Plans is the most relevant method to achieve Policy 2.1.1 	Oppose	Limits and targets have already been set in the regional plan: water.	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Pioneer Generation Limited	142	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, as appropriate; and c) Protect the values of outstanding water bodies and wetlands; and ... d)	<ul style="list-style-type: none"> Policy 2.1.1 is overly restrictive. 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. Concerned that Policy 2.1.1 does not require 	Oppose	Limits and targets have already been set in the regional plan: water.	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Upper Clutha Conservation	144	Amend	Change the wording to: "c) Protect, <u>restore and enhance</u> where degraded	No reason given.	Support	Support	Support

Peter and Margaret	146	Amend	Amend to provide greater clarity on the [Water	Unclear how "outstanding water bodies /	Support	Support	Support
Peter and Margaret Hore	146	Support	Retain Policy 2.1.1 (d).	Gives indigenous biodiversity greater protection over other freshwater species, in accordance with the RMA.	Oppose	The existing Policy 2.1.1(d) is sufficient for protecting indigenous freshwater species, and Fish and Game has proposed amendments to this policy to further strengthen it.	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Peter and Margaret Hore	146	Amend	Replace "avoid" with or "minimise" (in Policy 2.1.1 (n)).	<ul style="list-style-type: none"> • "Avoid" is too restrictive, particularly if it results in a prohibited activity. • 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. • "Avoid" is at odds with approach in Policy 4.5.5 which talks about controlling adverse effects. 	Support in part	Fish and Game supports the need to clarify the responsibility for the adverse effects of pest species.	
Remarkables Park Limited and Queenstown Park Limited	147	Amend	<ul style="list-style-type: none"> • Clarification as to what constitutes outstanding water bodies. • The provisions could also be improved by providing better integration between the policies for outstanding water bodies, infrastructure and discharges. 	<ul style="list-style-type: none"> • There is no guidance to assist in determining what waterbodies are outstanding. • Schedules 3, 4, 6 & 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. 	Support in part	Part 9 of the Act identifies criteria by which outstanding water bodies could be assessed, in the absence of further clarification in the NPS-FM itself. Fish and Game's submission seeks the inclusion of the Part 9 criteria in the RPS.	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Landpro Limited	150	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.	Support in part	There is an acknowledged problem here, but it requires site-specific solutions by the agencies responsible for the management of those fish species, usually DOC and Fish and Game. The resource consent and minimum flow process is often the trigger for interventions, which can include modified flow regimes. Fish and Game have suggested a method for relief on this point	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission which include more detail on handling sports fish-native fish interactions.
Straterra	151	Amend	Support subject to following amendments: "...j) Provide for the protection, use and development of Kai Tahu values; and ... l) Provide for the protection, use and development of f Protect important recreation values; and ... n) Avoid, remedy or mitigate the adverse effects of pest species, prevent their introduction and reduce their spread; and..."	<ul style="list-style-type: none"> • 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). • Should be cautious about calling for protection without any consideration of a proposal. • 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". 	Oppose	Not necessarily, as applications to take water are assessed under the regional plan: water, and not the RPS. The RPS will guide any future review of the regional plan: water, however	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Te Runanga o Moeraki, Kati Huirana	154	Amend	Add estuaries to items a), h) and m).	Ngai Tahu cultural values do not support the mixing of stormwater and freshwater/coastal	Support	Support	Support
Te Runanga o Moeraki, Kati Huirana	154	Amend	Amend item k): "Protect Kai Tahu values, rights and interests; and"	Need specific policies to protect Kai Tahu interests.	Support	Support	Support

Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Amend	Add further policies, to: - Preference of discharge to land over discharge to water where adverse effects of discharge to land are less than discharge to water. - Avoid discharges (point and non-point source) to water and those discharges to land, where such	Need greater policy guidance on water allocation, intensification, and discharges.	Support	Support	Support
Otago Conservation Board	155	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.	Support	Support	Support
Dunedin City Council	156	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?	Support	Support	Support
3.2 Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins							
Angus Mackay	33	Amend	<ul style="list-style-type: none"> Greater/faster (ORC measured & recorded) growth of riparian planting zones on water outlets from ALL farms in Otago . Farmers should be given incentives to buy into 	<ul style="list-style-type: none"> To improve the water-quality of our rivers significantly in line with other more advanced regions e.g. Taranaki. Improve the scenery of our landscape and 	Support	Support	Support
Alec Saunders	35	Amend	Add a new paragraph to Policy 2.1.2: "(m) Avoid and mitigate the adverse effects of con	While the policy specifies pests, for example, it does not include degradation caused by human	Support	Support	Support
Phil Murray	42	Amend	Add clause: "Maintain and enhance their	Rivers' recreation values are often very	Support	Support	Support
Lynne Stewart	47	Amend	Add clauses: • " Maintain and enhance their recreation value; "	Rivers' recreation values are often very dependent on good management of their beds and margins.	Support	Support	Support
			•				

PowerNet Limited	60	Amend	<p>Amend as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to:</p> <p>a) Protect or restore their natural <u>Maintain functioning in order to provide for key values</u>; and</p> <p>b) Protect <u>the values of</u> outstanding water bodies and wetlands; and</p> <p>...</p> <p>e) Retain the range and extent of habitats supported; and</p> <p>f) Maintain or enhance natural character; and</p> <p>g) Protect <u>Provide for</u> Kai Tahu values; and</p> <p>h) Provide for other cultural values; and</p> <p>...</p> <p>k) Mitigate the adverse effects of natural hazards, including flooding and erosion; and</p> <p>l) Maintain bank stability, and</p> <p>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</u></p>	<ul style="list-style-type: none"> • 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. • 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. • Additional minor amendments are also required to ensure this policy is consistent with PowerNet submission on Policy 2.1.1. 	Oppose	<p>Other objectives and policies in the RPS recognise the economic values to be obtained from natural resources. This objective is designed to recognise and protect the intrinsic values of freshwater, and not to blur that protection with other aims, such as economic and social wellbeing that are covered by other objectives and policies in the RPS</p>	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
KiwiRail Holdings Limited	69	Amend	<p>Amend Policy as follows:</p> <p>...</p> <p>" m) <u>Maintain the ability of existing infrastructure to operate within their design parameters.</u> "</p>	<ul style="list-style-type: none"> • Recognition of infrastructure in beds of rivers and lakes, wetlands and their margins would recognise practicalities around public access and natural character enhancement. • Ensuring that infrastructure can continue to operate as designed will address these matters, and is consistent with Policy 2.1.1(p). 	Support	Support	Support

Contact Energy Limited	74	Amend	<ul style="list-style-type: none"> • Add a further management outcome as follows: "<u>m) Maintain the ability of existing infrastructure to operate with in their design parameters.</u>" • Amend a) to read: "Protect or restore their <u>existing</u> natural functioning;" • In b), insert a cross reference to Policy 2.2.12. • 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>" • Amend f) to read: "Maintain or enhance <u>existing</u> natural character". • Amend i) to read: "Maintain <u>existing</u> aesthetic and amenity values". • Delete j). 	<ul style="list-style-type: none"> • It is appropriate that Policy 2.1.2 also includes maintaining infrastructure, in particular hydro electric generation infrastructure: • 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. • Section 62 (3) of the RMA requires an RPS to give effect to both NPSs. • The values to be protected, restored, maintained etc are expressed too broadly: • The meaning of "outstanding" water body needs clarification; • Natural processes and their effects need to be acknowledged; • It is appropriate to clarify that protection applies to current values; • Unclear how freshwater management may achieve j). 	Support in part	<p>Fish and Game supports item (m) of the relief sought by Contact Energy to give effect to the NPS on Renewable Electricity Generation. It does not support any further relief sought, particularly the emphasis on "existing" values, as this implies that our rivers and streams are in an ideal or natural state, with no further improvement possible.</p>	Support (m) provided it also states "... and in accordance with resource consents or other permissions required to operate the infrastructure"
Matthew Sole	75	Amend	<ul style="list-style-type: none"> • Retain (a) - (c) and (f) - (k) as proposed • Amend d) to read: "Maintain indigenous biodiversity and healthy ecosystems, enhance and restore degraded ecosystems and indigenous biodiversity." • Amend e) to read: "Retain the full natural range of habitats and indigenous species supported by freshwater." • 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." • Add new item: "Protect recreational use and access to the margins of Otago's water bodies." 	<ul style="list-style-type: none"> • d): Not all ecosystems are currently healthy: need to provide for the restoration and enhancement of degraded ecosystems. • 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. • l): A key tool for managing margins is to maintain and restore riparian vegetation. • Margins of water bodies are important for recreation. 	Support in part	<p>Relief point (d) and (e) are contrary to the relief sought in (d) and could result in a degradation of water quality and quantity</p>	Amend based on Matthew Sole's recommendations apart from relief point (d) and (e)

Aurora Energy Limited	76	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</u> where appropriate. "	<ul style="list-style-type: none"> • 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. • Does not provide for growth and development opportunities in the Region, which are important for Otago's social and economic wellbeing. 	Oppose	Section 5(2) doesn't require a balance, it requires the sustainable management of resources whilst preserving their life-supporting capacity.	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
NZ Transport Agency	78	Support	Retain Policies 2.1.2(k) and (l).	<ul style="list-style-type: none"> • Flood mitigation can have a positive effect on the safety and functionality of infrastructure. 	Support	Support	Support
Trustpower Limited	85	Amend	Amend as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: a) Protect or restore their natural <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) Retain the range and extent of habitats supported; and f) Maintain or enhance natural character; and g) Protect <u>Provide for</u> Kai Tahu values; and h) Provide for other cultural values; and ... k) Mitigate the adverse effects of natural hazards, including flooding and erosion; and l) Maintain bank stability, and 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"> • 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. • 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. • Additional minor amendments are also required to ensure this policy is consistent with PowerNet submission on Policy 2.1.1. 	Oppose	Not necessarily, as the operation of hydroelectricity schemes are governed under the regional plan: water, and not the RPS. The RPS will guide any future review of the regional plan: water, however	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Forest and Bird NZ	98	Amend	<ul style="list-style-type: none"> • Retain (a) - (c) and (f) - (k) as proposed. • Amend (d) to read: "Maintain indigenous biodiversity and healthy ecosystems, enhance and restore degraded ecosystems and indigenous biodiversity." • Amend (e) to read: "Retain the full range of habitats and indigenous 	<ul style="list-style-type: none"> • Not all ecosystems are currently healthy, so the policy needs to provide for the restoration and enhancement of degraded ecosystems. • 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. • Not all banks of water bodies are currently 	Support	Support	Support

Fonterra Co-operative Group Limited	99	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.	Oppose	Oppose, Policy 2.1.2 is necessary for the regional council's functions under s30 for land use activities on lake or riverbeds.	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Royalburn Farming Company Ltd	102	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	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Walter Peak Station	103	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 from	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
			<u>inappropriate subdivision, use and development ;</u> and				
Millbrook Country Club	104	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	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Eastburn Farm	105	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 from	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
RCL Queenstown PTY Ltd	106	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 from	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Damper Bay Estates Ltd	107	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 from	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Halfway Bay Station	108	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</u> inappropriate subdivision, use and development ; and	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
			... g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values , as identified in Schedule 1A ; and..."		Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Water Tight Investments Ltd	109	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</u>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
The Fertiliser Association of New Zealand Inc.	110	Amend	• Clarification on the intended triggers and outcome of clause c) • Amend Policy 2.1.2 as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ..."	Opposes clauses b), c) and g) for the same reasons as discussed under Policy 2.1.1.	Oppose	There is no need to introduce another significance test for outstanding water bodies, when "outstanding" itself is already an undefined	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
W.G. Nagle	111	Amend	Explain what is meant by 'good' water quality and ecosystem 'health'.	No reason given	Support in part	Good water quality is well-defined in the Regional Plan: Water	No decision sought
Waitaki Irrigators Collective Limited	113	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.	Oppose	The appropriateness or otherwise of restoring a water body is best left to other processes. The policy already implicitly includes this test by having the options of "maintain" or "enhance" anyway.	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Wise Response Society Inc.	114	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> Managing for the values of beds of rivers and lakes, wetlands, and their margins Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to:	<ul style="list-style-type: none"> • Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth. • Need to optimise integration across land, freshwater, estuarine and marine interfaces as a single ecosystem complex. • The flavour of policies need to be less anthropocentric: ultimately, we are not in control and the values that we place on ecosystems etc. 	Support	Support	
Federated Farmers of New Zealand	115	Amend	Amend as follows (or words to similar effect): "Policy 2.1.2 g)	<ul style="list-style-type: none"> • The use of the word protect is a high threshold and where values are "ephemeral" 	Oppose	Oppose, policy 2.1.2(g) is already limited in its extent to the margins and beds of lakes and rivers, it isn't a policy with wide scope	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Zealand			Protect <u>Provide for Kai Tahu values; and ..."</u>	<p>protection can be difficult to achieve.</p> <ul style="list-style-type: none"> • A less onerous policy would achieve similar outcomes while providing more flexibility. 			
AgResearch Ltd	116	Oppose	Delete Policy 2.1.2	Policy 2.1.2 appears to repeat the matters covered under Policy 2.1.1 so is unnecessary.	Oppose	Policy 2.1.2 is necessary to for the ORC to fulfil its functions under s30 of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Director-General of Conservation	117	Support	Retain as notified.	As written the policy is consistent with Section 6(a) of the RMA.	Support	Support	Support relief sought by the D-G.
Otago and Central South Island Fish and Game Councils	118	Amend	Amend as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to: ...	<ul style="list-style-type: none"> • Need to provide for degraded ecosystems and indigenous biodiversity and indigenous biodiversity to be restored or enhanced. • As written, the policy ignores the positive and 			
Heritage New Zealand Pouhere Taonga	120	Amend	Add the following clause: "m) <u>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	Support	Support	Support relief sought by Heritage New Zealand.

Otago Water Resource Users Group	121	Amend	<ul style="list-style-type: none"> Delete Policy 2.1.2a) and e). Amend Policy 2.1.2 g) as follows: "ProtectProvide for Kai Tahu values; and". 	<ul style="list-style-type: none"> Water abstraction and storage and associated structures can interfere with the natural functioning of the beds of rivers. 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. Clause e) as currently written prevents any modification that would reduce the range and extent of habitats supported. Clause g) as currently written elevates Kai Tahu values above activities that impact on the value to be protected. Clauses a) and e) can be deleted as these matters are adequately covered by clause d). 	Oppose	Matters of detail such as this are best left to the Regional Plan: Water to handle. There are sufficient objectives and policies within the proposed RPS to handle the abstraction of water, including structures needed for abstraction	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Horticulture New Zealand	124	Amend	<ul style="list-style-type: none"> 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: ..." Include methods for identification of values. 	<ul style="list-style-type: none"> It is not clear where or how values will be identified. For values to be recognised and managed, they need to first be identified. 	Oppose	The regional plan: water has the list of values of waterways.	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Soho Basin Skifield Limited	129	Amend	Amend Policy as follows: "Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to:	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in
			g) Protect Kai Tahu values from inappropriate subdivision.				
Northlake Investments Limited	130	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 from	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Shotover Country Limited	131	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 from	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Ayrburn Farm Developments Limited	132	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 from	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Bridesdale Farm Developments Limited	133	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 from	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Glencoe Station Limited	134	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 from inappropriate subdivision, use and development ;	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
			use and development ; and				
Treble Cone Investment Limited	135	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 from	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Woodlot Properties Limited	136	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 from	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Henley Downs Farm Holdings Limited	137	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 from	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Real Journeys	138	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 from	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Oceana Gold (New Zealand) Limited	140	Amend	<ul style="list-style-type: none"> • 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. • Amend to explain whether there is a priority ranking or how the factors are meant to be balanced against on another. 	<ul style="list-style-type: none"> • 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? • 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. • 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. 	Oppose	Chapter 4 of the RPS contains objectives and policies for the use and development of land, which includes wetlands. The water plan also contains similar objectives and policies, and a framework of rules for the consideration of resource consents.	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
			<p>"Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to:</p> <p>a) Protect or restore their natural <u>Maintain their functioning in order to provide for key values</u>; and</p> <p>b) Protect <u>the values of</u> outstanding water bodies and wetlands; and</p> <p>c) <u>In accordance with established freshwater objectives,</u></p> <p><u>m</u>Maintain good water quality, or enhance it where it has been degraded; and ...</p> <p>e) Retain the range and extent of habitats supported, <u>as appropriate</u>; and ...</p> <p>k) Mitigate the adverse effects of natural hazards, including flooding and erosion; and</p> <p>l) Maintain bank stability .; and</p> <p><u>m) 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></p>	<ul style="list-style-type: none"> • Amendments sought to ensure consistency with Policy 2.1.1 above, for those reasons that have already been discussed with respect to that policy. • 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. • Concerned that parts of Policy 2.1.2 could restrict existing activities that utilise freshwater resources. Example given, refer to submission. 	Oppose	Chapter 4 of the RPS contains objectives and policies for the use and development of freshwater, which includes hydroelectricity. The water plan also contains similar objectives and policies, and a framework of rules for the consideration of resource consents.	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Straterra	151	Amend	Support subject to following amendments: <p>"... a) Protect<u>Provide for</u> or restore their natural functioning; and</p> <p>...</p> <p>e) (delete item)</p>	<ul style="list-style-type: none"> • Should be cautious about calling for protection without any consideration of a proposal. • 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". 	Oppose	King Salmon applies to national policy statements, rather than regional policy statements	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	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	Policies not specific enough to provide clear direction on outcomes sought.	Support	Support	Support relief sought by Kai Tahu
Otago Conservation	155	Amend	Indicate that no preference for any specific land	Although other areas of the PRPS specifically	Support	Support	Support relief sought
33 Policy 2.1.3 - Managing for coastal water values							
Alec Saunders	35	Amend	Add to Policy 2.1.3: <u>(j) "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"> 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. 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. 	Support	Support	
Herbert Heritage	41	Amend	• Amend Policy 2.1.3(h) as follows: Protect	No reason given.	Support	Support	
The Southern District Health Board	51	Amend	Support and add following clauses: • <u>(j) ensure that coastal elements (built environment including</u>	<ul style="list-style-type: none"> The effect of coastal waters on localised structures (in relation to climate change) cannot be ignored in the RPS. Untreated stormwater discharges into coastal 	Support	Support	
Alliance Group Limited	56	Amend	Amend the policy as follows: "Recognise coastal water values, and manage coastal water, to: ... f) Protect <u>Provide for</u> Kai Tahu values; and ... j) <u>Maintain the ability to use coastal water for infrastructure</u> <u>and by those providing for the economic, health and safety</u> and social wellbeing of the community."	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.	Oppose	Chapter 4 of the RPS contains objectives and policies for the use and development of coastal water, which includes hydroelectricity. The water plan also contains similar objectives and policies, and a framework of rules for the consideration of resource consents.	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

PowerNet Limited	60	Amend	Amend the policy as follows: "Recognise coastal water values, and manage coastal water, to: ... f) Protect Provide for Kai Tahu values; and ... g) Provide for other cultural values; and ... i) <u>Maintain the ability to use coastal water for infrastructure</u> and by those providing for the economic, health and safety and social wellbeing of the community."	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.	Oppose	Chapter 4 of the RPS contains objectives and policies for the use and development of coastal water, or activities that might affect coastal water, which includes the transmission of electricity. The water plan also contains similar objectives and policies, and a framework of rules for the consideration of resource consents.	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Yellow-eyed Penguin Trust	63	Amend	Amend values a) to i) to prioritise healthy habitats and	<ul style="list-style-type: none"> • Values a) to i) appear to have equal ranking. • Healthy habitats and ecosystems are the basis 	Support	Support	Include changes sought by the Yellow-
KiwiRail Holdings Limited	69	Amend	Amend Policy as follows:	<ul style="list-style-type: none"> • KiwiRail have infrastructure throughout the Otago region that is adjacent to, or in, the coastal • Header: The policy creates ambiguity as values are not defined, and can be conflicting. 	Support	Support	
Matthew Sole	75	Amend	<ul style="list-style-type: none"> • Amend title to "Managing for healthy coastal ecosystems". • Amend a) to read: "Ensure healthy coastal ecosystems, and..." • Amend to b) read: "Retain the full range of habitats and indigenous species in the coastal marine area." • Amend (h) to read: "Protect recreation values" • Retain (c) - (g) and (l) as proposed. 	<ul style="list-style-type: none"> • a): Term "support" is unclear and does not provide direction to decision makers. Use "Ensuring". • 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. • h): The RPS does not define important recreational values, this is a superfluous and restricting qualifier. 	Support in part	Support in part, except the amendments need to recognise sports fish values in the coastal marine area (i.e. estuaries) as well	Include changes sought by Matthew Sole, with the addition of sports fish values.

Aurora Energy Limited	76	Amend	Insert new clause (j) as follows: " (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. "	<ul style="list-style-type: none"> • 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. • Does not provide for growth and development opportunities in the Region, which are important for Otago's social and economic wellbeing. 	Oppose	Chapter 4 of the RPS contains objectives and policies for the use and development of coastal water. The water plan also contains similar objectives and policies, and a framework of rules for the consideration of resource consents.	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
PauaMAC 5 Incorporated and The Otago Rock Lobster Industry Association Incorporated	80	Amend	Amend (h) to read: "protect important recreation and commercial values."	<ul style="list-style-type: none"> • The paua and rock lobster industries are entirely reliant on clean coastal waters and healthy coastal ecosystems. Appropriate to acknowledge it in policy. • Proposed amendment consistent with Policies 2.1.6, which recognises indigenous species important for commercial purposes, & 2.2.14, which recognises the degree of soil versatility for primary production as a value of the soil resource. • 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). 	Oppose	Chapter 4 of the RPS contains objectives and policies for the use and development of coastal water. The water plan also contains similar objectives and policies, and a framework of rules for the consideration of resource consents.	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Forest and Bird NZ	98	Amend	<ul style="list-style-type: none"> • Managing for healthy ecosystems on river beds, lakes, wetlands and their margins. • Amend (a) to read "Ensure healthy coastal ecosystems, and" 	<ul style="list-style-type: none"> • Support with proposed amendments. • The policy creates ambiguity as values are not defined, and can be conflicting. • Use of the term "support" is unclear and does 	Support	Support	Support changes sought by Forest and Bird
Fonterra Co-operative Group Limited	99	Amend	Amend as follows: "Policy 2.1.3 Managing for coastal water values Recognise coastal water values, and manage coastal water, to: ... d) Maintain coastal water quality at a level that is sufficient to	<ul style="list-style-type: none"> • 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) & h). • f): there is no definition of "good" water quality or of the circumstances or timeframes in which water quality will be considered 	Oppose	The regional plan: water is the most appropriate place to define good water quality.	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Royalburn Farming Company Ltd	102	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from</u>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Walter Peak Station	103	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from</u>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Millbrook Country Club	104	Amend	Amend Policy as follows: "Recognise coastal water values, a) Provide for other cultural values	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Eastburn Farm	105	Amend	Amend Policy as follows: "Recognise coastal water values, a) Provide for other cultural values	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
RCL Queenstown PTY Ltd	106	Amend	Amend Policy as follows: "Recognise coastal water values, a) Provide for other cultural values	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Damper Bay Estates Ltd	107	Amend	Amend Policy as follows: "Recognise coastal water values,	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Halfway Bay Station	108	Amend	Amend Policy as follows: "Recognise coastal water values,	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Name	Number	Position	Decision Requested	Reason for Decision Requested			
			g) Provide for other cultural values , as identified in Schedule 1A ; and h) Protect important recreation values <u>from inappropriate subdivision, use and development</u> ; and ..."		Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Water Tight Investments Ltd	109	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from</u>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Wise Response Society Inc.	114	Amend	Amend as follows: "Policy 2.1.3 <u>Managing coastal water for ecosystem function and value</u> Managing for coastal water values Recognise coastal water <u>and estuary</u>	<ul style="list-style-type: none"> • Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth. • Need to optimise integration across land, freshwater, estuarine and marine interfaces as a 	Support	Support	
Director-General of Conservation	117	Amend	Amend as follows: "Recognise coastal water values, and manage coastal water, to:	<ul style="list-style-type: none"> • 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 	Support	Support	

Horticulture New Zealand	124	Amend	<ul style="list-style-type: none"> 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"> include methods for identification of values. It is not clear where or how values will be identified. For values to be recognised and managed, they need to first be identified. 	Oppose	Identification of values for coastal water and the coastal environment is a matter for the coastal plan and the water plan.	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Name	Number	Position	Decision Requested	Reason for Decision Requested		
Soho Basin Skifield Limited	129	Amend	Amend Policy as follows: "Recognise coastal water values,	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national	Oppose	There is no need to repeat the provisions of the Act Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Northlake Investments Limited	130	Amend	Amend Policy as follows: "Recognise coastal water values,	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national	Oppose	There is no need to repeat the provisions of the Act Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Shotover Country Limited	131	Amend	Amend Policy as follows: "Recognise coastal water values,	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national	Oppose	There is no need to repeat the provisions of the Act Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Ayrburn Farm Developments	132	Amend	Amend Policy as follows: "Recognise coastal water values,	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national	Oppose	There is no need to repeat the provisions of the Act Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Bridesdale Farm Developments Limited	133	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: c) Protect migratory patterns of coastal water species <u>from</u> inappropriate subdivision, use and development, unless detrimental to indigenous biodiversity; and ...	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Glencoe Station Limited	134	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from</u>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Treble Cone Investment Limited	135	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from</u>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Woodlot Properties Limited	136	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from</u>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Henley Downs Farm Holdings Limited	137	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species <u>from</u>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Real Journeys	138	Amend	Amend Policy as follows: "Recognise coastal water values, and manage coastal water, to: ... c) Protect migratory patterns of coastal water species from	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
				inappropriate subdivision, use and development, unless detrimental to indigenous biodiversity; and ...			
Ravensdown Works Limited	143	Amend	<ul style="list-style-type: none"> Amend (d) so there is an option to maintain or enhance without reference to degradation: "Maintain or enhance coastal water quality; and". Insert new (j) "Allow for the economic use of and discharges into coastal water within a sustainable range." 	<ul style="list-style-type: none"> Support coastal water quality and values being maintained or enhanced. There should be provision for existing discharges to continue without further degrading but also without enhancing water quality. Economic use should be included in a policy for "Managing for coastal water values". 	Oppose	There is no need to repeat the provisions of the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou	154	Amend	Amend policy as follows: "a) <u>Protect</u> support healthy coastal ecosystems <u>and enhance d</u>	<ul style="list-style-type: none"> 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. 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 	Support	Support	
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	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 land use, subdivision and development - Use cultural monitoring tools to monitor the health of coastal water bodies. - Manage effects of siltation (particularly on	<ul style="list-style-type: none"> 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. 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 	Support	Support	
Otago Conservation	155	Amend	[Make item c) of the PRPS] stronger and more	In protection of migration, the species and	Support	Support	
Dunedin City Council	156	Amend	<ul style="list-style-type: none"> Include the following provision: "Mitigate the adverse effects of natural hazards 	<ul style="list-style-type: none"> To recognise that natural hazards are a relevant management concern for coastal water, and to 	Support	Support	
35 Policy 2.1.5 - Managing for soil values							
Agrissentials Mosgiel	15	Did not	<ul style="list-style-type: none"> ORC needs to introduce measures to protect this 	<ul style="list-style-type: none"> All life is dependent upon soil, water and 	Support	Support	

Clutha District Council	28	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).	Support	Support
Egg Producers Federation of New Zealand	29	Amend	Replace "soil" by "land" throughout the Policy	<ul style="list-style-type: none"> • 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. 	Support	Support
Alliance Group Limited	56	Amend	Amend the policy as follows: "Recognise soil values, and manage soils, to: ... g) Protect <u>Provide for</u> Kai Tahu values; and ... h) Provide for other cultural values, 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> "	<ul style="list-style-type: none"> • 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. • 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. 	Oppose	Oppose the removal or downgrade of Ngai Tahu interests Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
PowerNet Limited	60	Amend	Amend the policy as follows: "Recognise soil values, and manage soils, to: ... g) Protect <u>Provide for</u> Kai Tahu values; and ... h) Provide for other cultural values, 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.	Oppose	Oppose the removal or downgrade of Ngai Tahu interests Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

HW Richardson Group Limited	61	Amend	Amend the policy as follows: "Recognise soil values, and manage soils, to: ... g) Protect <u>Provide for</u> Kai Tahu values; and ... h) Provide for other cultural values, 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.	Oppose	Oppose the removal or downgrade of Ngai Tahu interests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Matthew Sole	75	Amend	<ul style="list-style-type: none"> • Rewrite to manage soil impacts from intensive soil use. • Amend b) to read: "b) maintain soil diversity and restore where it has been degraded." • Add "k) protect significant undeveloped soils from disturbance" 	There is conflict between achieving values (a-e) and (f)	Support	Support	Support the relief sought by Matthew Sole
NZ Pork Industry Board	83	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.	Support	Support	Support the relief sought by the NZ Pork Industry Board
Rayonier Matariki Forests Limited	84	Support	Retain as notified.	<ul style="list-style-type: none"> • Support the need to recognise & manage soil values, particularly retaining soil resources for primary production. • "Primary production" should be defined and include plantation forestry. 	Support	Support	Support the relief sought by Rayonier Matariki Forests Limited
Trustpower Limited	85	Amend	Amend the policy as follows: "Recognise soil values, and manage soils, to: ... g) Protect <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 soil, in that	Oppose	Oppose the removal or downgrade of Ngai Tahu interests	Maintain proposed version of RPS, subject to changes sought in
McKeague Consultancy Ltd	89	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"> • "Avoid" is too restrictive, particularly if it results in a prohibited activity status. • Policy is overly restrictive, unrealistic and impossible to implement and monitor 	Support in part	"Avoid" may be too strong a test in some places, but "minimise" is not a test, "remedy" or "mitigate" is a better term.	
				effectively, because any foreign substance can contaminate soil.			

Jolyon Manning JP	93	Did not specify	The ORC should have a stand-alone quality soil monitor policy as a follow up of the earlier "Grow Otago" project.	<ul style="list-style-type: none"> • 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. 	Support	Support this as it recognises the wider aspects of biodiversity in a rural environment, rather than simply indigenous biodiversity	Support the relief sought by Jolyon Manning JP
Forest and Bird NZ	98	Support	Retain as proposed	No reason given.	Support	Support	
Fonterra Co-operative Group Limited	99	Amend	<ul style="list-style-type: none"> • Delete clauses h), i) and k), • Amend g) to read: "g) Protect Kai Tahu and other cultural values; and". 	<ul style="list-style-type: none"> • Clauses h), i) and k) are ambiguous or duplicate other PRPS provisions. • 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). 	Oppose	Oppose the removal or downgrade of Ngai Tahu interests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Royalburn Farming Company Ltd	102	Amend	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those</u> soils, to: ... f) <u>Retain Ensure the primary use of regionally significant</u>	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS should be focused on resource management issues of regional significance. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Walter Peak Station	103	Amend	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those</u> soils, to: ... f) <u>Retain Ensure the primary use of regionally significant</u>	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS should be focused on resource management issues of regional significance. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Millbrook Country Club	104	Amend	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those</u> soils, to: ... f) <u>Retain Ensure the primary use of regionally significant</u>	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS should be focused on resource management issues of regional significance. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Eastburn Farm	105	Amend	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those</u> soils, to: ...	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. • The PRPS should be focused on resource management issues of regional significance. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

			f) Retain <u>Ensure the primary use of regionally significant soil resources is for primary production purposes</u> ; and	<ul style="list-style-type: none"> Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial
RCL Queenstown PTY Ltd	106	Amend	Amend as follows: "Recognise soil values that are of a <u>regional significance</u> , and manage those soils, to: ... f) Retain <u>Ensure the primary use of regionally significant soil resources is for primary production purposes</u> ; and	<ul style="list-style-type: none"> Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. The PRPS should be focused on resource management issues of regional significance. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Damper Bay Estates Ltd	107	Amend	Amend as follows: "Recognise soil values that are of a <u>regional significance</u> , and manage those soils, to: ... f) Retain <u>Ensure the primary use of regionally significant soil resources is for primary production purposes</u> ; and	<ul style="list-style-type: none"> Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. The PRPS should be focused on resource management issues of regional significance. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Halfway Bay Station	108	Amend	Amend as follows: "Recognise soil values that are of a <u>regional significance</u> , and manage those soils, to: ... f) Retain <u>Ensure the primary use of regionally significant soil resources is for primary production purposes</u> ; and	<ul style="list-style-type: none"> Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. The PRPS should be focused on resource management issues of regional significance. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Water Tight Investments Ltd	109	Amend	Amend as follows: "Recognise soil values that are of a <u>regional significance</u> , and manage those soils, to: ... f) Retain <u>Ensure the primary use of regionally significant soil resources is for primary production purposes</u> ; and	<ul style="list-style-type: none"> Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. The PRPS should be focused on resource management issues of regional significance. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
			h) Provide for other cultural values, as identified in Schedule 1A; and				
The Fertiliser Association of New Zealand Inc.	110	Amend	<ul style="list-style-type: none"> Amend as follows: "Recognise soil values, and manage the effects of activities which impact on soils, to: ... e) Maintain soil's function as a buffer or filter for pollutants <u>contaminants</u> resulting from human activities and natural events, including for the protection of <u>soil</u> at risk, <u>soil</u> at risk, of <u>soil</u> at risk 	<ul style="list-style-type: none"> 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. 	Support in part	Support this, apart from the downgrade to Kai Tahu interests.	
Waitaki Irrigators Collective Limited	113	Support	Support.	Supports the inclusion of primary production values in relation to soils.			

Wise Response Society Inc.	114	Amend	Amend as follows: "Policy 2.1.5 <u>Managing soil for ecosystem function and value</u> Managing for soil values Recognise soil values, and manage soils, to: a) <u>Sustain and enhance</u> Maintain their life supporting	<ul style="list-style-type: none"> • Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth. • Need to optimise integration across land, freshwater, estuarine and marine interfaces as a single ecosystem complex. • The flavour of policies need to be less 	Support	Support	
Federated Farmers of New Zealand	115	Amend	Delete proposed Policy 2.1.5 f).	<ul style="list-style-type: none"> • Submitter supports the recognition of the importance of soil to primary production and the primary sector. • 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 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. 	Oppose	Policy 2.1.5(f) is necessary for the regional council to undertake its role under section 30(1)(c)(i)	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
AgResearch Ltd	116	Amend	Retain clauses (f) and (j). Delete clause (h)	<ul style="list-style-type: none"> • 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. • 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. 	Support in part	Support the submitter's intention to retain (f) and (j), but (h) should remain as soils can contain other cultural values.	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Director-General of Conservation	117	Support	Retain as notified	Provides for the important function of soil in managing good water quality.	Support	Support	Support
Otago and Central South Island Fish and Game Councils	118	Amend	Add the following clause: "m) <u>Avoid human or animal-induced</u> sediment runoff."	<ul style="list-style-type: none"> • As written the list of policy items does not include any mention of preventable erosion. • Rule 12.C.0.3 of the Regional Plan: Water justifies a similar policy in the RPS. 			

Heritage New Zealand Pouhere Taonga	120	Support	Adopt Policy 2.1.5(i).	<ul style="list-style-type: none"> 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. The policy provides for sections 6(e) & 6(f) of the RMA. 	Support	Support	Support relief sought by Heritage New Zealand.
Horticulture New Zealand	124	Amend	<ul style="list-style-type: none"> Amend Policy 2.1.5 as follows: "<u>Identify and recognise soil values and manage land to: ...</u>" Include an additional point: "<u>Provide for food production values.</u>" Retain: Maintain highly values soil resources. 	<ul style="list-style-type: none"> It is not clear where or how values will be identified. For values to be recognised and managed, they need to first be identified. Horticulture NZ supports the recognition of the soil resource for primary production and highly valued soil resources. 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". 	Support	There is no land plan to identify and map soil values and so it is not clear where a statutory list of soil values will appear. As such, the identification and scheduling process is challenging, but it does need to occur. Fish and Game supports the inclusion of food production values as a criteria within this policy	Support relief sought by Horticulture New Zealand.
Clutha Agricultural Development Board	126	Amend	<ul style="list-style-type: none"> 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 soils; 	<ul style="list-style-type: none"> 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. There is considerable soil erosion occurring all 	Support	Support	Support relief sought by the Clutha Agricultural Development Board
Soho Basin Skifield Limited	129	Amend	<ul style="list-style-type: none"> Amend as follows: "Recognise soil values: <u>that are of a regional significance</u>, and manage <u>those</u> soils, to: ... f) <u>Retain. Ensure the primary use of regionally signifi</u> 	<ul style="list-style-type: none"> Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. The PRPS should be focused on resource management issues of regional significance. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Northlake Investments Limited	130	Amend	<ul style="list-style-type: none"> Amend as follows: "Recognise soil values: <u>that are of a regional significance</u>, and manage <u>those</u> soils, to: ... f) 	<ul style="list-style-type: none"> Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. The PRPS should be focused on resource 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Shotover Country Limited	131	Amend	Amend as follows: "Recognise soil values that are of a regional significance, and manage those soils, to: ... f) Retain Ensure the primary use of regionally significant soil resources is for primary production purposes; and	<ul style="list-style-type: none"> Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. The PRPS should be focused on resource management issues of regional significance. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Ayrburn Farm Developments Limited	132	Amend	Amend as follows: "Recognise soil values that are of a regional significance, and manage those soils, to: ... f) Retain Ensure the primary use of regionally significant soil resources is for primary production purposes; and	<ul style="list-style-type: none"> Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. The PRPS should be focused on resource management issues of regional significance. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Bridesdale Farm Developments Limited	133	Amend	Amend as follows: "Recognise soil values that are of a regional significance, and manage those soils, to: ... f) Retain Ensure the primary use of regionally significant soil resources is for primary production purposes; and	<ul style="list-style-type: none"> Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. The PRPS should be focused on resource management issues of regional significance. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Glencoe Station Limited	134	Amend	Amend as follows: "Recognise soil values that are of a regional significance, and manage those soils, to: ... f) Retain Ensure the primary use of regionally significant soil resources is for primary production purposes; and	<ul style="list-style-type: none"> Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. The PRPS should be focused on resource management issues of regional significance. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Treble Cone Investment Limited	135	Amend	Amend as follows: "Recognise soil values that are of a regional significance, and manage those soils, to: ...	<ul style="list-style-type: none"> Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. The PRPS should be focused on resource management issues of regional significance. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Name	Number	Position	Decision Requested	Reason for Decision Requested			
			f) Retain Ensure the primary use of regionally significant soil resources is for primary production purposes; and	<ul style="list-style-type: none"> Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Woodlot Properties Limited	136	Amend	Amend as follows: "Recognise soil values that are of a regional significance, and manage those soils, to: ... f) Retain Ensure the primary use of regionally significant soil resources is for primary production purposes; and	<ul style="list-style-type: none"> Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. The PRPS should be focused on resource management issues of regional significance. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Henley Downs Farm Holdings Limited	137	Amend	Amend as follows: "Recognise soil values that are of a regional significance, and manage those soils, to: ... f) Retain Ensure the primary use of regionally significant	<ul style="list-style-type: none"> Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. The PRPS should be focused on resource management issues of regional significance. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Real Journeys	138	Amend	Amend as follows: "Recognise soil values that are of a regional significance, and manage those soils, to: ... f) Retain Ensure the primary use of regionally significant	<ul style="list-style-type: none"> Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. The PRPS should be focused on resource management issues of regional significance. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Oceana Gold (New Zealand) Limited	140	Amend	<ul style="list-style-type: none"> Amend to clarify if there is a ranking or if it is acceptable to comply with one factor but not another. 	<ul style="list-style-type: none"> 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. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in
Balance Agri-Nutrients Limited	141	Support	Adopt as notified.	<ul style="list-style-type: none"> Provides high-level policy direction in relation to managing the pressure generated by 'non-productive land use activities' demand for productive land. 	Support	Support	Support Balance Agrinutrients.
Ravensdown Works Limited	143	Amend	Amend (k) as follows "Where possible avoid contamination of soil that would result in contaminated land and"	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.	Support in part	Support a better definition of "contamination" or "contaminant"	Support a better definition of these terms.
Peter and Margaret Hore	146	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.	Support in part	This issue may be fixed by a better definition of "contamination" or "contaminant"	Support this if the relief sought can be achieved through a definition change.

Remarkables Park Limited and Queenstown Park Limited	147	Amend	<ul style="list-style-type: none"> 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. 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. 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. Clarify the difference between high quality soils and highly versatile soils. 	<ul style="list-style-type: none"> 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. 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. 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 	Oppose	The ORC needs to give effect to section 30(1)(c)(i) which requires the conservation of soils, therefore the objectives and policies need to refer to all soils, not just highly valued or significant soils	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Straterra	151	Amend	Support subject to the following amendments (as follows): "...g) <u>Provide for the use, development and pProtection of Kai Tahu values; and</u>	<ul style="list-style-type: none"> 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 			
Te Runanga o Moeraki, Kati Huirapa	154	Amend	Amend policy as follows: "e) Protect Kai Tahu values.	Erosion, nutrient loss and sediment loss all have impacts on water quality and therefore Kai Tahu	Support	Support	
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou	154	Amend	<ul style="list-style-type: none"> Add further policies to: Avoid and remedy significant induced: <ul style="list-style-type: none"> soil erosion nutrient loss 	Erosion, nutrient loss and sediment loss all have impacts on water quality and therefore Kai Tahu values.	Support	Support	
Dunedin City Council	156	Amend	Reword (i) to reflect requirements of Heritage NZ Pouhere Taonga Act 2014 which require an	For (i), clarification is sought of the intent behind "maintain the soil mantle where it acts as a	Support	Support	
Dunedin City Council	156	Amend	Amend (k) as follows "Avoid Minimise the adverse effects of existing con	Existing contaminated soils should be managed in accordance with the NES for Assessing and	Support	Support	

Dunedin City Council	156	Amend	Clearly identify in the methods how each of the provisions in this policy will be given effect to, including through Regional	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.	Support	Support. Given that there is no land or soil regional plan, this RPS may need to provide an inventory of soils, or make reference to a non-statutory soil inventory in order for District Councils to have access to the required information to add to their District Plans	Amend as requested by the DCC
36 Policy 2.1.6. Managing for ecosystem and indigenous biodiversity values							
Otago Peninsula Biodiversity Group	40	Support	We support this policy.	No reason given.	Support	Support	
Central Otago Wilding Conifer Control Group	49	Support	Support.	Strongly support. Grateful to see clause h, which would include the need to address wilding conifer spread.	Support	Support	
Alliance Group Limited	56	Oppose	Delete this policy.	<ul style="list-style-type: none"> This policy applies to all ecosystems, indigenous and otherwise, and has no regard to the significance of these ecosystems. As other policies provide for areas of significance this policy is not needed. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
PowerNet Limited	60	Oppose	Delete this policy.	<ul style="list-style-type: none"> This policy applies to all ecosystems, indigenous and otherwise, and has no regard to the significance of these ecosystems. As other policies provide for areas of significance this policy is not needed. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
HW Richardson Group Limited	61	Oppose	Delete this policy.	<ul style="list-style-type: none"> This policy applies to all ecosystems, indigenous and otherwise, and has no regard to the significance of these ecosystems. As other policies provide for areas of significance this policy is not needed. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Yellow-eyed Penguin Trust	63	Amend	Amend policy to specifically support enhancement through re- establishment of seabird colonies on the Otago coast	Strongly support this policy as important and valuable section, with elements, such as c), meeting ecological best practise	Support	Support	Support

Matthew Sole	75	Amend	<ul style="list-style-type: none"> • Re-write heading to read: "Managing to achieve healthy natural ecosystems and indigenous biodiversity." • Re-write the [1st sentence] to read: "Protect 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:" • Amend a) to read: "Maintaining or enhancing good ecosystem health and function, intact natural" 	<ul style="list-style-type: none"> • The policy creates ambiguity as neither ecosystem nor biodiversity values are defined, and they can be conflicting. • We need to managing adverse effects of pests and land use rather than managing ecosystems and indigenous biodiversity. • a) repeats the Act. Amend to make policy describe what is going to be done, rather than the outcome • b): Much of Otago's remaining indigenous vegetation has been significantly modified, yet it 	Support in part	Relief point (a),(b),(c) and the proposed rewords to (e) to (g) could result in a degradation of water quality and quantity and Fish and Game opposes these. (d) is supported	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission and (d) proposed by Mr Sole
Matthew Sole	75	Amend	Add the following new items: <ul style="list-style-type: none"> • (As new item b))"Facilitating and supporting restoration of degraded natural ecosystems and 	<ul style="list-style-type: none"> • Restoration is needed in places where biodiversity has been lost and habitats degraded. Using eco sourced indigenous species that occur 	Support	Support	Support relief sought by Mr Sole.
			<ul style="list-style-type: none"> reduce and where practicable eliminate risk of further loss; and facilitate and support activities to protect and improve habitat" • (As new item c)) "Avoiding fragmentation, reduction in size and extent of indigenous ecosystems and habitats of indigenous species." • "Avoiding any significant adverse effect as far as 	<ul style="list-style-type: none"> • Biodiversity maintenance is not achieved if biodiversity that is lost is not replaced by enhancement measures under a biodiversity offset. • The creation of new habitat will be one way of reversing the decline of indigenous biodiversity. • The protection, sustenance and enhancement 			
Darby Planning LP	81	Amend	Amend e) and g) as follows: <ul style="list-style-type: none"> • "e) Protect <u>Maintain</u> natural resources and processes that support indigenous biodiversity; and" • "g) Protect <u>Maintain</u> biodiversity significant to Kai Tahu; and" 	<ul style="list-style-type: none"> • The "protection" requirement in these clauses is too high a test and fails to recognise that the effects of existing activities. • 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. 	Oppose	Oppose downgrade to policy	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Meridian Energy Limited	82	Amend	Amend (e) and (g) as follows: <ul style="list-style-type: none"> "e) Protect <u>Maintain</u> natural resources and processes that support indigenous biodiversity; and (...) 	<ul style="list-style-type: none"> • 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 	Oppose	Oppose downgrade to policy	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Trustpower Limited	85	Oppose	Delete this policy.	<ul style="list-style-type: none"> • This policy applies to all ecosystems, indigenous and otherwise, and has no regard to the significance of these ecosystems. • As other policies provide for areas of significance this policy is not needed. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Forest and Bird NZ	98	Amend	<ul style="list-style-type: none"> • Re-write heading to read: "Managing to achieve healthy natural ecosystems and indigenous biodiversity." • 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:" • Amend (a) to read; 	<ul style="list-style-type: none"> • Neither ecosystem nor biodiversity values are defined, and can conflict. • Address loss and degradation of natural ecosystems by managing adverse effects rather than ecosystems and indigenous biodiversity. • (a) more or less repeats the Act. Amend to make policy describe what is going to be done, rather than the outcome • (b) Much of Otago's remaining indigenous vegetation has been significantly modified, yet it 	Support in part	Support except where the introduction of an indigenous-only test could result in a potential degradation of water quality or quantity	
			"Avoid the adverse effects of pest species, prevent				
Royalburn Farming Company Ltd	102	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) <u>Protect biodiversity significant to Kai Tahu</u>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	The RPS should avoid repeating the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Walter Peak Station	103	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) <u>Protect biodiversity significant to Kai Tahu</u>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	The RPS should avoid repeating the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Millbrook Country Club	104	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"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	The RPS should avoid repeating the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Eastburn Farm	105	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) <u>Protect biodiversity significant to Kai Tahu</u>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	The RPS should avoid repeating the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
RCL Queenstown PTY Ltd	106	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) <u>Protect biodiversity significant to Kai Tahu</u>	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	The RPS should avoid repeating the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Damper Bay Estates Ltd	107	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"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	The RPS should avoid repeating the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Halfway Bay Station	108	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"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	The RPS should avoid repeating the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Water Tight Investments Ltd	109	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"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	The RPS should avoid repeating the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
				unsuitable soils for intensive pastoralism. • More land must be restored to native species to provide resilient ecosystems as a			
Wise Response Society Inc.	114	Amend	Amend as follows: "Policy 2.1.6 Managing for ecosystem and indigenous biodiversity values Recognise <u>and manage</u> the values of ecosystems and indigenous biodiversity, and manage ecosystems and indigenous biodiversity, to: a) MainSustain and/or enhance land, estuarine and m	• Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth. • Need to optimise integration across land, freshwater, estuarine and marine interfaces as a single ecosystem complex. • The flavour of policies need to be less anthropocentric: ultimately, we are not in control and the values that we place on ecosystems etc.	Support	Support	Support

Federated Farmers of New Zealand	115	Amend	Amend as follows (or words to similar effect): "Policy 2.1.6 Managing for ecosystem and indigenous biodiversity values ... c) Buffer or link existing ecosystems; and d) Protect i Important hydrological services, including the services provided by tussock grassland <u>are recognised and provided where appropriate</u> ; and ... g) Protect b Biodiversity significant to Kai Tahu <u>is identified and active management is encouraged</u> ; and " ...	<ul style="list-style-type: none"> • 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. • 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. • 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. 	Support	Federated Farmers are correct in that we do need a non-regulatory mechanism to compensate for the loss of production values on private land. At the present time, the hydrological services provided by tussock grassland are not incentivised. However, a non-regulatory mechanism is best developed in the context of stronger protection and recognition of these values in regional and district planning documents. Fish and Game notes that the RPS has delegated the introduction of	A non-regulatory mechanism to protect and enhance tussock grasslands needs to be developed alongside the introduction of rules for dry catchments. That appears to be the best way to achieve support for this concept.
Director-General of Conservation	117	Amend	Amend as follows: "Recognise the values of ecosystems and <u>indigenous biodiversity, and manage ecosystems</u> customary purposes; and	<ul style="list-style-type: none"> • It is unclear whether this policy is exclusive to management of ecosystems and indigenous biodiversity in a terrestrial context 	Support	Support	Support
Queenstown Airport Corporation	122	Oppose	Delete this policy.	<ul style="list-style-type: none"> • This policy applies to all ecosystems, indigenous and otherwise, and has no regard to the significance of these ecosystems. • As other policies provide for areas of significance this policy is not needed. 	Oppose	Oppose the introduction of new significance tests	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Clutha Agricultural	126	Amend	• We support [Policy 2.1.6 a) to h)].	More effort and initiative must go into promoting	Support	Support	Support
Environmental Defence Society Incorporated	127	Amend	<ul style="list-style-type: none"> • Reclassify as a series of objectives. • Amend clause (a) as follows: "Objective: <u>Maintain the full range of ecosystem and habitat types in the region</u> 	<ul style="list-style-type: none"> • This policy is more readily classified as an objective, or series of objectives. • Clause (a) is supported in principle. It is consistent with section 30(1)(ga). Amendments 	Support	Support	

Soho Basin Skifield Limited	129	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</u> inappropriate subdivision, use and development ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	The RPS should avoid repeating the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Northlake Investments Limited	130	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</u> inappropriate subdivision, use and development ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	The RPS should avoid repeating the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Shotover Country Limited	131	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</u> inappropriate subdivision, use and development ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	The RPS should avoid repeating the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Ayrburn Farm Developments Limited	132	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</u> inappropriate subdivision, use and development ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	The RPS should avoid repeating the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Bridesdale Farm Developments Limited	133	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</u> inappropriate subdivision, use and development ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	The RPS should avoid repeating the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Glencoe Station Limited	134	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</u> inappropriate subdivision, use and development ; and"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	The RPS should avoid repeating the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Treble Cone Investment Limited	135	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"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	The RPS should avoid repeating the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Name	Number	Position	Decision Requested	Reason for Decision Requested			
Woodlot Properties Limited	136	Amend	"g) Protect biodiversity significant to Kai Tahu 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	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	The RPS should avoid repeating the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Henley Downs Farm Holdings Limited	137	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"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	The RPS should avoid repeating the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.
Real Journeys	138	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"	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.	Oppose	The RPS should avoid repeating the Act	Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.

Oceana Gold (New Zealand) Limited	140	Amend	<ul style="list-style-type: none"> Amend to provide for instances where indigenous biodiversity values may not be maintained or enhanced. Amend (a) to refer to indigenous biodiversity "at a regional scale". Also amend (d) to read: "Protect Promote important hydrological services, including..." 	<ul style="list-style-type: none"> 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. 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. The policy would not support remediation of tussock grasslands as in the Coronation project. 	Support in part	Support the intent of Oceania Gold are saying but biodiversity offsets and mitigation are hard to provide for at the level of an RPS, as these are site specific assessments associated with development proposals. Fish and Game does not consider that the objectives and policies of the RPS preclude this from occurring
Upper Clutha Little Valley Station Ltd	144 148	Amend Amend	<p>Clarify the terms "values" and "recognise".</p> <p>Remove clause 2.1.6 d).</p>	<p>[Policy 2.1.6] includes a good list of intended</p> <ul style="list-style-type: none"> 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. Current research into the part tussock grasslands plays in water harvesting and freshwater quality is not conclusive and therefore cannot be supported. 	Support Oppose	<p>Support</p> <p>Current research into tussock grasslands concludes that they are important and vital in sustaining water yield. There is no academic debate on this point. The academic debate is about the mechanism, fog capture vs evapotranspiration. Recent research suggests that both mechanisms play a role</p> <p>Maintain proposed version of RPS, subject to changes sought in F&G's initial submission.</p>
Te Runanga o Moeraki, Kati Huirapa	154	Amend	<p>Amend policy as follows:</p> <p>"g) Protect <u>ecosystems</u> and biodiversity significant</p>	<ul style="list-style-type: none"> Does this include freshwater biodiversity and instream ecosystems or coastal ecosystems? 	Support	<p>Support</p> <p>Support</p>

Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Amend	Add further policies to: - Restore ecosystems and indigenous biodiversity in locations where it will contribute to: • inherent biological diversity • Otago's distinctive natural character • social, cultural, environmental and economic wellbeing of people and communities	<ul style="list-style-type: none"> • Does this include freshwater biodiversity and instream ecosystems or coastal ecosystems? • This policy overlaps with Policies 2.2.1 and 2.2.2 and is very confusing. 	Support	Support	Support
			policy.				
Dunedin City Council	156	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.	Support	This is similar to Fish and Game's relief. The terminology of biodiversity, biological diversity, ecosystem, indigenous, pest, and predator needs careful thought as the imposition of qualifiers can have unintended consequences	Clarify terminology
Dunedin City Council	156	Amend	Amend (c) to clarify what is meant by buffering of existing ecosystems.	No reason given.	Support	Support	
Dunedin City Council	156	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"> • 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. • A regional biodiversity strategy will be of benefit. 	Support	Support	
Dunedin City Council	156	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.	Support	Support	

Director-General of Conservation	117	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:	<ul style="list-style-type: none"> • 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 	Support	Support	Support
5.4 Policy 2.2.12 - Identifying outstanding water bodies and wetlands							
Contact Energy Limited	74	Amend	Amend Policy 2.2.12 f) to read as follows: "f) Significant hydrological values (including electricity generation capacity) "	<ul style="list-style-type: none"> • Contact supports Policy 2.2.12 as providing clear criteria as to how "outstanding" quality will be assessed. • f) requires some further clarification, given the approach of including natural and anthropogenic values. • "A high degree of naturalness" should be explained in the glossary. 	Oppose	The list of values of an outstanding water body does not usually include hydroelectric power generation, however, Fish and Game's amendments to policy 2.2.12 provide for the recognition of some waters that are not in their natural state, which could include waters that have been dammed.	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
McKeague Consultancy Ltd	89	Amend	<ul style="list-style-type: none"> • Provide greater detail of what constitutes a significant value. • Provide clarity around what a hydrological value is. • Provide clarity as to whether all of these criteria need to be present or just one. 	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?	Support in part	Fish and Game's relief has included criteria for identifying outstanding rivers	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Fonterra Co-operative Group Limited	99	Oppose	Delete Policy 2.2.12.	Duplicates matters that are within the scope of Policy 2.2.3.	Oppose	Oppose, natural features are not outstanding water bodies	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
The Fertiliser Association of New Zealand Inc.	110	Amend	Amend as follows: "Identify outstanding water bodies and wetlands and their significant values, using the following criteria:	<ul style="list-style-type: none"> • 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. 	Oppose	This appears to be a semantic argument. An outstanding water body is the significance test in itself.	Maintain the notified version of the regional policy statement, except where

Director-General of Conservation	117	Amend	Amend as follows: " Identifying wetlands and outstanding water	<ul style="list-style-type: none"> This policy generally reflects the definition of outstanding water bodies in the NPSEM 2014. 	Support	Support	Support
Environmental Defence Society Incorporated	127	Amend	Amend Policy 2.2.12 as follows: <ul style="list-style-type: none"> Provide for the identification of the "significant values" of wetlands. 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 	<ul style="list-style-type: none"> The identification of outstanding freshwater bodies is supported. In order for these to be protected (Objective A2(a) and B4 NPSEM) they must be identified. The protection afforded to wetlands under the NPSEM is not focused on outstanding wetlands, but on the significant values of all wetlands. This distinction must be recognized in the RPS. The identification criteria are extremely broad and highly subjective. They are premised on the 	Support in part	Fish and Game's relief has included criteria for identifying outstanding rivers	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Oceana Gold (New Zealand) Limited	140	Amend	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> 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. 	Support in part	Fish and Game's relief has included criteria for identifying outstanding rivers	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Ballance Agri-Nutrients Limited	141	Support	<ul style="list-style-type: none"> Adopt Policy 2.2.12 as notified 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. 	<ul style="list-style-type: none"> 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. The criteria make no specific reference to indigenous biodiversity or water quality values. 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. 	Support in part	Fish and Game's relief has included criteria for identifying outstanding rivers	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Pioneer Generation Limited	142	Support	That Policy 2.2.12 be retained as notified.	<ul style="list-style-type: none"> 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. Policy 2.2.12 should be supported by a schedule that provides additional direction 	Support in part	Fish and Game's relief has included criteria for identifying outstanding rivers	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.

				around the specific values under each of the six criteria.			
Peter and Margaret Hore	146	Amend	<ul style="list-style-type: none"> • Provide greater detail of what constitutes a significant value. • Provide clarity around what a hydrological value is. • Provide clarity as to whether all of these criteria need to be present or just one. 	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?	Support in part	Fish and Game's relief has included criteria for identifying outstanding rivers	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Remarkables Park Limited and Queenstown Park Limited	147	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"> • 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. • 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. 	Support in part	Fish and Game's relief has included criteria for identifying outstanding rivers	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Amend	<ul style="list-style-type: none"> • Amend policies as follows: "c) Significant takata whenua cultural values values as identified by Kai Tahu." • Add Method 1: Kai Tahu Relationships. • Cross reference to Policies 2.1.1, 2.1.2, 2.1.6. 	Kai Tahu must be involved in identifying cultural values associated with outstanding water bodies and wetlands.	Support in part	Fish and Game's relief has included criteria for identifying outstanding rivers. Fish and Game is happy to support any additional criteria raised by Ngai Tahu.	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission, and where Ngai Tahu may wish to add other criteria.
5.5 Policy 2.2.13 - Managing outstanding water bodies and wetlands							
Central Otago Wilding	49	Support	Support.	Note and support d).	Support	Support	Support
The Southern District Health Board	51	Amend	Support with the following amendments: "a) Avoiding significant adverse effects, including	An example would be helpful to further clarify what is being stated.	Support	Support, although this applies to all water	Support
Contact Energy Limited	74	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.			

Matthew Sole	75	Amend	Same wording change re values as for 2.2.4. [i.e.: • a): "avoiding adverse effect on those attributes and qualities which ..." • d): "preventing spread" instead of "reducing".	No reason given.	Support	Support	Support
Aurora Energy Limited	76	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"> • There should be scope to allow for the remediation or mitigation of adverse effects, including significant adverse effects. • In King Salmon, "avoid" was held to have a greater weight than if the environmental bottom line approach was adopted. 	Oppose	King Salmon applies to national policy statements, rather than regional policy statements	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Darby Planning LP	81	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) <u>Avoiding significant adverse effects, including cumulative effects, on those significant values which contribute to the water body or wetland being outstanding; and</u>	<ul style="list-style-type: none"> • 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. • Interpretation of the policy would be aided by re-ordering clause (c) to clause (a). 	Oppose	An outstanding water body is already a significance test in itself, it doesn't require a further significance test	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Meridian Energy Limited	82	Amend	Amend Policy 2.2.13 as follows "Protect the significant values	<ul style="list-style-type: none"> • Objectives A2 and B4 of the NPS however only seek to ensure that the "significant" 			
			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> a) b) <u>Avoiding significant adverse effects, inclu</u>	<ul style="list-style-type: none"> values of outstanding waterbodies, and wetlands are protected. • 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 	Oppose	An outstanding water body is already a significance test in itself, it doesn't require a further significance test	Maintain the notified version of the regional policy statement, except where amendments have
New Zealand Petroleum and Minerals	86	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"> • 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. • The policy framework will potentially 	Oppose	King Salmon applies to national policy statements, rather than regional policy statements	Maintain the notified version of the regional policy statement, except where amendments have

McKeague Consultancy Ltd	89	Amend	<ul style="list-style-type: none"> • Replace "avoid" with "avoid and minimise" or "minimise" [in Policy 2.2.13]. • Delete [Policy 2.2.13] (b). 	<ul style="list-style-type: none"> • "Avoid" is too restrictive, particularly if it results in a prohibited activity status. • Paragraph (b) of the policy adds nothing to what is already in the RMA and is unnecessary. 	Oppose	Outstanding water bodies require a high test	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Queenstown Lakes District Council	95	Support	Support 2.2.13(d).	Provides the basis for more effective control of wilding pines, an issue particularly significant for Queenstown Lakes District.	Support	Support	Support
Transpower New Zealand Limited	97	Amend	<p>Make similar amendments to the following changes suggested for Policy 2.2.4:</p> <p>"Protect, enhance and restore the values of outstanding natural features, landscapes and seascapes, by:</p> <p>a) avoiding <u>,or where this is not practicable, remedying or mitigating</u> adverse effects...; and</p> <p>b) Avoiding, remedying or mitigating other adverse effects on other values; and;</p> <p>"</p>	<ul style="list-style-type: none"> • 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". • Whilst the RPS acknowledges that some developments need to be located in particular areas, the underlying policies do not acknowledge this. • Such a prohibitive approach would not give effect to the NPSET 	Oppose	King Salmon applies to national policy statements, rather than regional policy statements	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Fonterra Co-operative Group Limited	99	Oppose	Delete Policy 2.2.13.	Duplicates matters that are within the scope of Policy 2.2.4.	Oppose	Oppose, natural features are not outstanding water bodies	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.

Royalburn Farming Company Ltd	102	Amend	Amend as follows: "Protect <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) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and ..."	<ul style="list-style-type: none"> • 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). 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Walter Peak Station	103	Amend	Amend as follows: "Protect <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	<ul style="list-style-type: none"> • 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). 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
			wetland being outstanding; and ...				
Millbrook Country Club	104	Amend	Amend as follows: "Protect <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	<ul style="list-style-type: none"> • 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). 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Eastburn Farm	105	Amend	Amend as follows: "Protect <u>Manage subdivision, use and development that affects</u> the values of outstanding water bodies and wetlands by: a) Avoiding significant adverse effects	<ul style="list-style-type: none"> • 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 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have

RCL Queenstown PTY Ltd	106	Amend	Amend as follows: " Protect <u>Manage subdivision, use and development that affects</u> the values of outstanding water bodies and wetlands by: a) Avoiding significant adverse effects	<ul style="list-style-type: none"> • 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 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have
Damper Bay Estates Ltd	107	Amend	Amend as follows: " Protect <u>Manage subdivision, use and development that affects</u> the values of outstanding water bodies and wetlands by: a) Avoiding significant adverse effects	<ul style="list-style-type: none"> • 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 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have
Halfway Bay Station	108	Amend	Amend as follows: " Protect <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	<ul style="list-style-type: none"> • 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). 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
			...				
Water Tight Investments Ltd	109	Amend	Amend as follows: " Protect <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	<ul style="list-style-type: none"> • 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). 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
The Fertiliser Association of New Zealand Inc.	110	Amend	Amend as follows: "Protect the <u>significant</u> values of outstanding water bodies and wetlands by: a) <u>Assessing the significance of adverse effects on significant values, as detailed in Schedule 3; and</u> a) 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 b) c) Avoiding, remedying or mitigating other adver	<ul style="list-style-type: none"> • FANZ supports the intent of the Policy. • 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. 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.

Wise Response Society Inc.	114	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 by:</u> a) <u>Avoiding activities with risk of significant</u>	<ul style="list-style-type: none"> • 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. 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Federated Farmers of New Zealand	115	Amend	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) Avoiding, rRemedying 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 where feasible."	<ul style="list-style-type: none"> • a) A degree of significance required in respect to cumulative effects. • b) Use of the word 'avoiding' is unnecessarily punitive and goes beyond what is required for adverse effects which are neither significant nor cumulative. • e) Encouraging enhancement should be sought through non-regulatory methods and qualified for feasibility. 	Oppose	The wording of the notified version is sufficient - "Significant adverse effects, including cumulative effects" indicates that both the adverse effects and the cumulative effects must be significant in order to avoid them	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Director-General of	117	Amend	Amend as follows:	Proposed amendment ensures that the Policy	Support	Support	Support
Otago and Central South Island Fish and Game Councils	118	Amend	Amend as follows: "Protect the values of outstanding water bodies and wetlands by: ... b) Avoiding, remedying or mitigating other adverse	<ul style="list-style-type: none"> • The RPS is required to give effect to the RMA and water conservation orders. • As currently written Policy 2.1.13 does not 	Support	Support	Support
Environmental Defence Society Incorporated	127	Amend	Amend the RPS to: <ul style="list-style-type: none"> • Include specific freshwater objectives, including objectives relating to freshwater bodies and wetlands. • Require avoidance of permanent loss of <u>significant values of wetlands and outstanding</u> 	<ul style="list-style-type: none"> • Managing outstanding water bodies and wetlands is critical to ensuring they are protected and preserved. • The chapeau to Policy 2.2.13 specifies a goal as opposed to a course of action. It is more <u>appropriately classified as an objective.</u> 	Support	Support	Support

Soho Basin Skifield Limited	129	Amend	Amend as follows: " Protect <u>Manage subdivision, use and development that affects</u> the values of outstanding water bodies and wetlands by: a) Avoiding significant adverse effects from inappropriate <u>subdivision, use and development</u> , including cumulative effects, on those values which contribute to the water body or wetland being	<ul style="list-style-type: none"> • 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). 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Northlake Investments Limited	130	Amend	Amend as follows: " Protect <u>Manage subdivision, use and development</u> that affects the values of outstanding water bodies and wetlands by: a) Avoiding significant adverse effects from inappropriate <u>subdivision, use and development</u> , including cumulative effects, on those values which contribute to the water body or wetland being	<ul style="list-style-type: none"> • 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). 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Shotover Country Limited	131	Amend	Amend as follows: " Protect <u>Manage subdivision, use and development</u> that affects the values of outstanding water bodies and wetlands by: a) Avoiding significant adverse effects	<ul style="list-style-type: none"> • 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 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have
Ayrburn Farm Developments Limited	132	Amend	Amend as follows: " Protect <u>Manage subdivision, use and development</u> that affects the values of outstanding water	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
			bodies and wetlands by: a) Avoiding significant adverse effects from inappropriate <u>subdivision, use and development</u> , including cumulative effects, on those values which contribute to the water body or wetland being	<ul style="list-style-type: none"> • The practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3). 			

Bridesdale Farm Developments Limited	133	Amend	Amend as follows: " Protect <u>Manage subdivision, use and development</u> nt that affects 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	<ul style="list-style-type: none"> • 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). 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Glencoe Station Limited	134	Amend	Amend as follows: " Protect <u>Manage subdivision, use and development</u> nt that affects 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	<ul style="list-style-type: none"> • 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). 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Treble Cone Investment Limited	135	Amend	Amend as follows: " Protect <u>Manage subdivision, use and development</u> nt that affects 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	<ul style="list-style-type: none"> • 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). 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Woodlot Properties Limited	136	Amend	Amend as follows: " Protect <u>Manage subdivision, use and development</u> nt that affects the values of outstanding water bodies and wetlands by: a) Avoiding significant adverse effects	<ul style="list-style-type: none"> • 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 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have
Henley Downs Farm Holdings Limited	137	Amend	Amend as follows: " Protect <u>Manage subdivision, use and development</u> nt that affects the values of outstanding water bodies and wetlands by:	<ul style="list-style-type: none"> • 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. 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.

			a) Avoiding significant adverse effects from inappropriate subdivision, use and development, including cumulative effects on those values which	<ul style="list-style-type: none"> • Schedule 3 criteria are inadequate (see submission on Schedule 3). 			
Real Journeys	138	Amend	Amend as follows: "Protect <u>Manage subdivision, use and development</u> nt that affects the values of outstanding water bodies and wetlands by: a) Avoiding significant adverse effects	<ul style="list-style-type: none"> • 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 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have
Oceana Gold (New Zealand) Limited	140	Amend	Amend: "a) Avoiding, remedying or mitigating significant..."	Avoiding these effects may not always be possible.	Oppose	It is necessary to maintain an avoid test for outstanding water bodies	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Peter and Margaret Hore	146	Amend	Replace "avoid" with "minimise" [in Policy 2.2.13].	"Avoid" is too restrictive, particularly if it results in a prohibited activity status.	Oppose	It is necessary to maintain an avoid test for outstanding water bodies	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Peter and Margaret Hore	146	Amend	Delete [Policy 2.2.13] (b).	Paragraph (b) of the policy adds nothing to what is already in the RMA and is unnecessary.	Oppose	It is necessary to maintain both tests for outstanding water bodies	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.

Remarkables Park Limited and Queenstown Park Limited	147	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"> • 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. • 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. 	Support in part	Fish and Game's relief has included criteria for identifying outstanding rivers	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Straterra	151	Amend	Support subject to the following amendments: "Protect <u>Maintain</u> , or enhance the values of outstanding water bodies and wetlands by: a) Avoiding, <u>remedying or mitigating</u> significant adverse effects, including cumulative effects, on	<ul style="list-style-type: none"> • 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. 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have
Te Runanga o Moeraki Kati Huirana	154	Amend	Add Method 1: Kai Tahu Relationships.	No reason given.	Support	Support	Support
56 Policy 2.2.14 - Identifying highly valued soil resources							
Egg Producers Federation of New Zealand	29	Amend	Replace "soil" by "land" throughout the Policy	<ul style="list-style-type: none"> • 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. 	Support in part	Do not replace the word "soil" because soil is a vital non-renewable resource, but there may	
Alliance Group Limited	56	Oppose	Delete this policy.	<ul style="list-style-type: none"> • It is appropriate to identify areas of high valued soil resource. • This policy appears to be an unnecessary duplication of the matters contained within Policy 2.1.5. 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
PowerNet Limited	60	Oppose	Delete this policy.	<ul style="list-style-type: none"> • It is appropriate to identify areas of high valued soil resource. • This policy appears to be an unnecessary duplication of the matters contained within Policy 2.1.5. 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.

HW Richardson Group Limited	61	Oppose	Delete this policy.	<ul style="list-style-type: none"> It is appropriate to identify areas of high valued soil resource. This policy appears to be an unnecessary duplication of the matters contained within Policy 2.1.5. 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Trustpower Limited	85	Oppose	Delete this policy.	<ul style="list-style-type: none"> It is appropriate to identify areas of high valued soil resource. This policy appears to be an unnecessary duplication of the matters contained within Policy 2.1.5. 	Oppose	Oppose a downgrade to this policy	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
McKeague Consultancy Ltd	89	Amend	<ul style="list-style-type: none"> Include highly productive soils. Include an "or" in the list. 	<ul style="list-style-type: none"> The criteria in this policy are specific and exclusive and therefore should also include soils 	Support	Support the changes sought to add highly	
Fonterra Co-operative	99	Support	Retain Policy 2.2.14.	Identifies matters that underpin the economic			
Royalburn Farming Company Ltd	102	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued <u>regionally significant</u> soil resources Identify areas and values of highly valued <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Walter Peak Station	103	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued <u>regionally significant</u> soil resources Identify areas and values of highly valued <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.

Millbrook Country Club	104	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued <u>regionally significant</u> soil resources Identify areas and values of highly valued <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Eastburn Farm	105	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued <u>regionally significant</u> soil resources Identify areas and values of highly valued <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
RCL Queenstown PTY Ltd	106	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued <u>regionally significant</u> soil resources Identify areas and values of highly valued <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Damper Bay Estates Ltd	107	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued <u>regionally significant</u> soil resources Identify areas and values of highly valued <u>regionally</u>	No reason given.	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
			significant soil resources, using the following				

Halfway Bay Station	108	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued <u>regionally significant</u> soil resources Identify areas and values of highly valued <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Water Tight Investments Ltd	109	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued <u>regionally significant</u> soil resources Identify areas and values of highly valued <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
The Fertiliser Association of New Zealand Inc.	110	Amend	Amend as follows: "Identify areas and values of highly valued soil resources, using the following criteria: a) Degree of Versatility for primary production; b)	<ul style="list-style-type: none"> 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. The policy does not provide any means of assessing whether there is a high degree of 	Support	Support	Support the relief proposed by the Fertiliser Association of New Zealand.
Wise Response Society Inc.	114	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued soil resources	<ul style="list-style-type: none"> Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth 	Support	Support	Support
AgResearch Ltd	116	Support	Retain Policy 2.2.14	It is prudent to identify areas and values of highly	Support	Support	Support
Otago and Central Horticulture New Zealand	118 124	Amend Amend	Clarify how significance will be determined and Amend Policy 2.2.14 as follows: <ul style="list-style-type: none"> a): "Existence of necessary attributes for high value Degree of versatility for primary production." Add new point: 	Support clauses b) and c) <ul style="list-style-type: none"> Horticulture NZ supports the recognition of the soil resource for primary production and highly valued soil resources. It should be clear that soil is valued for a range of purposes and should not necessarily be limited 	Support	Support	Support
Soho Basin Skifield Limited	129	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued <u>regionally significant</u> soil resources Identify areas and values of highly valued <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.

Northlake Investments Limited	130	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued <u>regionally significant</u> soil resources Identify areas and values of highly valued <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Shotover Country Limited	131	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued <u>regionally significant</u> soil resources Identify areas and values of highly valued <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Ayrburn Farm Developments Limited	132	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued <u>regionally significant</u> soil resources Identify areas and values of highly valued <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Bridesdale Farm Developments Limited	133	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued <u>regionally significant</u> soil resources Identify areas and values of highly valued <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.

Glencoe Station Limited	134	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued <u>regionally significant</u> soil resources Identify areas and values of highly valued <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Treble Cone Investment Limited	135	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued <u>regionally significant</u> soil resources Identify areas and values of highly valued <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Woodlot Properties Limited	136	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued <u>regionally significant</u> soil resources Identify areas and values of highly valued <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Henley Downs Farm Holdings Limited	137	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued <u>regionally significant</u> soil resources Identify areas and values of highly valued <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.

Real Journeys	138	Amend	Amend as follows: "Policy 2.2.14 Identifying highly valued <u>regionally significant</u> soil resources Identify areas and values of highly valued <u>regionally significant</u> soil resources, using the following criteria: ..."	No reason given.	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Ballance Agri-Nutrients Limited	141	Support	• Adopt Policy 2.2.14 as notified	• Supports the direction provided within the Policy to identify areas and values of highly			
			• 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	valued soil resources, specifically referring to versatility for primary production as one of the criteria under clause 'a'. • The RPS does not provide a set methodology	Support	Support	Support
Peter and Margaret Hore	146	Amend	• Include highly productive soils. • Include an "or" in the list.	• 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). • Need more clarity as to whether soils have to meet all the criteria, or just one.	Support	Support	Support
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki	154	Amend	• Amend policies as follows: "g) Kai Tahu values f) Significance for supporting unique ecosystems, habitats and indigenous flora and fauna "	No reason given.	Support	Support	Support
67 Policy 2.2.15 - Managing highly valued soil resources							
Clutha District Council	28	Amend	• Set out how Policy 2.2.15 will be implemented in the methods.	• Policy 2.2.15 is dependent on ORC undertaking research to inform Policy 2.2.14. It is not clear	Support	Support	Support

Egg Producers Federation of New Zealand	29	Amend	Replace "soil" by "land" throughout the Policy	<ul style="list-style-type: none"> • 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. • 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). • 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. • 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. 	Support in part	Do not replace the word "soil" because soil is a vital non-renewable resource, but there may be a place for recognising land as well
Central Otago District Council	37	Amend	<ul style="list-style-type: none"> • Refer to "highly valued soils". • Delete Policy 2.2.15 c). 	<ul style="list-style-type: none"> • Terminology should be consistent with the Glossary. • The standard mechanism for assessing significance of adverse effects is a de facto rule; the clause is unnecessary and inappropriate. 	Oppose	Oppose the deletion of policy 2.2.15(c). Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.

Alliance Group Limited	56	Oppose	Delete this policy.	<ul style="list-style-type: none"> • 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. • 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. • The policy repeats Policy 2.1.5, which is better worded as it refers to the maintenance of soil values. 	Oppose	Oppose the removal of this policy and Fish and Game is uncertain as to why reference is made to the NZCPS here	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
PowerNet Limited	60	Oppose	Delete this policy.	<ul style="list-style-type: none"> • 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. • 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. • The policy repeats Policy 2.1.5, which is better worded as it refers to the maintenance of soil values. 	Oppose	Oppose the removal of this policy and Fish and Game is uncertain as to why reference is made to the NZCPS here	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
HW Richardson Group Limited	61	Oppose	Delete this policy.	<ul style="list-style-type: none"> • 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. • It is not appropriate to apply the management regime established by the NZCPS on 	Oppose	Oppose the removal of this policy and Fish and Game is uncertain as to why reference is made to the NZCPS here	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
				outstanding natural character and outstanding natural landscapes within the coastal			
NZ Pork Industry	83	Amend	Amend 2.2.15 d) by adding a qualifier that the	Although urban expansion may be appropriate in	Support	Support	Support

Trustpower Limited	85	Oppose	Delete this policy.	<ul style="list-style-type: none"> • 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. • 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. • The policy repeats Policy 2.1.5, which is better worded as it refers to the maintenance of soil values. 	Oppose	Oppose the removal of this policy and Fish and Game is uncertain as to why reference is made to the NZCPS here	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
New Zealand Petroleum and Minerals	86	Amend	Amend limb a) of policy 2.2.15 as follows: "a) avoiding , remedying, or mitigating significant adverse effects on those values which contribute to the soil being highly valued; and".	<ul style="list-style-type: none"> • 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. • 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. • The benefits of new NZP&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. • Prevention of what can be an appropriate use and development may not always be the appropriate resource management outcome. 	Oppose	This is not necessary as "significant" adverse effects introduces a test in itself, in that activities on or under those soils may be able to take place.	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
McKeague Consultancy Ltd	89	Amend	<ul style="list-style-type: none"> • Replace "avoid" with "avoid and minimise" or "minimise" [in Policy 2.2.15 a)]. • Delete [Policy 2.2.15] (b). 	<ul style="list-style-type: none"> • "Avoid" is too restrictive, particularly if it results in a prohibited activity status. • Paragraph (b) of the policy adds nothing to what is already in the RMA and is unnecessary. 	Oppose	This is not necessary as "significant" adverse effects introduces a test in itself, in that activities on or under those soils may be able to take place.	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.

Fonterra Co-operative Group Limited	99	Amend	Replace clause d) and include additional provisions to read: <u>"(d) Avoiding the use of highly valued soils for urban expansion unless no alternative with lower value soils is available.</u> <u>(e) Ensuring that land use activities on highly valued soils are consistent with the continued use of such soils for primary production purposes."</u>	<ul style="list-style-type: none"> • Support the policy as it identifies matters that underpin the economic value of the soil resources for primary production activities. • 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. 	Oppose	This is not necessary as "significant" adverse effects introduces a test in itself, in that activities on or under those soils may be able to take place.	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Royalburn Farming Company Ltd	102	Amend	Amend as follows: "Policy 2.2.15 Managing highly valued <u>regionally significant</u> soil resources Protect the values of areas of highly valued <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects <u>from inappropriate</u>	<ul style="list-style-type: none"> • 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 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission
Walter Peak Station	103	Amend	Amend as follows: "Policy 2.2.15 Managing highly valued <u>regionally significant</u> soil resources	<ul style="list-style-type: none"> • 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, 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
			Protect the values of areas of highly valued <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects <u>from inappropriate subdivision, use and development</u> on those values	<ul style="list-style-type: none"> 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). 			

Millbrook Country Club	104	Amend	Amend as follows: "Policy 2.2.15 Managing highly valued <u>regionally significant</u> soil resources Protect the values of areas of highly valued <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	<ul style="list-style-type: none"> • 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 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Eastburn Farm	105	Amend	Amend as follows: "Policy 2.2.15 Managing highly valued <u>regionally significant</u> soil resources Protect the values of areas of highly valued <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects <u>from inappropriate</u>	<ul style="list-style-type: none"> • 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 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
RCL Queenstown PTY Ltd	106	Amend	Amend as follows: "Policy 2.2.15 Managing highly valued <u>regionally significant</u> soil resources Protect the values of areas of highly valued <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 highly valued regionally	<ul style="list-style-type: none"> • 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). 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
			significant; and ... c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and				

Damper Bay Estates Ltd	107	Amend	Amend as follows: "Policy 2.2.15 Managing highly valued <u>regionally significant</u> soil resources Protect the values of areas of highly valued <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	<ul style="list-style-type: none"> • 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 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Halfway Bay Station	108	Amend	Amend as follows: "Policy 2.2.15 Managing highly valued <u>regionally significant</u> soil resources Protect the values of areas of highly valued <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects <u>from inappropriate</u>	<ul style="list-style-type: none"> • 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 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Water Tight Investments Ltd	109	Amend	Amend as follows: "Policy 2.2.15 Managing highly valued <u>regionally significant</u> soil resources Protect the values of areas of highly valued <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	<ul style="list-style-type: none"> • 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 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
			urban expansion development may be appropriate ne.				
The Fertiliser Association of New Zealand Inc.	110	Amend	Amend as follows: "Protect the values of areas of highly valued soil resources, by: a) <u>Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</u> a)b) Avoiding significant adverse effects on those v	<ul style="list-style-type: none"> • Supports the intent of the Policy. • 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 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish

Wise Response Society Inc.	114	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	<ul style="list-style-type: none"> • Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth. • It is important the Plan reflects that a healthy "land base" is ultimately a essential platform for a healthy society and economy. 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Federated Farmers of New Zealand	115	Amend	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> "	<ul style="list-style-type: none"> • Submitter supports the intent to protect the values associated with highly valued soil resources. • The policy as currently worded may have prescriptive and unreasonable implications. • 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. 	Support in part	This depends on the nature of development. If "development" means using the soil for food production or agriculture, then that may make sense. If development means subdivision that renders the soil incapable of being used for food production, then Fish and Game cannot support this	This relief depends on the definition of "use and development"
AgResearch Ltd	116	Amend	Amend as follows: "Protect the values of areas of highly valued soil resources, by: ... d) Recognising that urban expansion may be appropriate due to location and proximity to existing urban development and infrastructure while avoiding reverse sensitivity effects on	<ul style="list-style-type: none"> • It is prudent to identify areas and values of highly valued soils in terms of sustaining farming in Otago. • Highly valued soils should generally only used for urban expansion where there is no other suitable land available adjacent to existing urban areas 	Support	This goes some way to clarifying and resolving the tension between urban development/affordable housing and future food production needs	Support
Ian Percy and Fiona Aitken, Ian Percy and	119	Amend	<ul style="list-style-type: none"> • Support the protection of high quality soils by avoiding 	<ul style="list-style-type: none"> • Concerned about reverse sensitivity effects on any neighbours from their productive rural 	Support	Support	Support
Horticulture New Zealand	124	Amend	<ul style="list-style-type: none"> • Amend Policy 2.2.15 as follows: "<u>Provide for</u> protect the values of area of highly valued land resources by: ..." • Add new points as follows: 	<ul style="list-style-type: none"> • 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 	Support	Support	

Clutha Agricultural Development Board	126	Amend	Delete d) "recognising that urban expansion may be appropriate due to location and proximity to existing urban development and infrastructure."	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.	Support	Support.	The relief proposed by AgResearch Limited may go some way to resolving this concern.
Soho Basin Skifield Limited	129	Amend	Amend as follows: "Policy 2.2.15 Managing highly valued <u>regionally significant</u> soil resources Protect the values of areas of highly valued <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects from <u>inappropriate subdivision, use and development</u> on those values which contribute to the soil being	<ul style="list-style-type: none"> • 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 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Northlake Investments Limited	130	Amend	Amend as follows: "Policy 2.2.15 Managing highly valued <u>regionally significant</u> soil resources Protect the values of areas of highly valued <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects from <u>inappropriate subdivision, use and development</u> on those values which contribute to the soil being highly valued <u>regionally significant</u> ; and	<ul style="list-style-type: none"> • 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). 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Shotover Country Limited	131	Amend	Amend as follows: "Policy 2.2.15 Managing highly valued <u>regionally significant</u> soil resources Protect the values of	<ul style="list-style-type: none"> • Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where
			c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and d) Recognising that				
Ayrburn Farm Developments Limited	132	Amend	Amend as follows: "Policy 2.2.15 Managing highly valued <u>regionally significant</u> soil resources Protect the values of areas of highly valued <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects from <u>inappropriate</u>	<ul style="list-style-type: none"> • 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 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.

Bridesdale Farm Developments Limited	133	Amend	Amend as follows: "Policy 2.2.15 Managing highly valued <u>regionally significant</u> soil resources Protect the values of areas of highly valued <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects <u>from inappropriate</u>	<ul style="list-style-type: none"> • 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 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Glencoe Station Limited	134	Amend	Amend as follows: "Policy 2.2.15 Managing highly valued <u>regionally significant</u> soil resources Protect the values of areas of highly valued <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	<ul style="list-style-type: none"> • 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 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
			due to location and proximity to existing urban de				
Treble Cone Investment Limited	135	Amend	Amend as follows: "Policy 2.2.15 Managing highly valued <u>regionally significant</u> soil resources Protect the values of areas of highly valued <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects <u>from inappropriate</u>	<ul style="list-style-type: none"> • 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 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Woodlot Properties Limited	136	Amend	Amend as follows: "Policy 2.2.15 Managing highly valued <u>regionally significant</u> soil resources Protect the values of areas of highly valued <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	<ul style="list-style-type: none"> • 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 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.

Henley Downs Farm Holdings Limited	137	Amend	Amend as follows: "Policy 2.2.15 Managing highly valued <u>regionally significant</u> soil resources Protect the values of areas of highly valued <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects from <u>inappropriate subdivision, use and development</u> on those values which contribute to the soil being	<ul style="list-style-type: none"> 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 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Real Journeys	138	Amend	Amend as follows: soil resources Protect the values of areas of highly valued <u>regionally significant</u> soil resources, by: a) Avoiding significant adverse effects from <u>inappropriate subdivision, use and development</u> on those values which contribute to the soil being highly valued <u>regionally significant</u> ; and	<ul style="list-style-type: none"> Amendment to reflect the RMA Part 2 direction <ul style="list-style-type: none"> 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). 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Oceana Gold (New Ballance Agri-Nutrients Limited	140 141	Amend Amend	Amend: "a) Avoiding, remedying or mitigating" Amend as follows: "Protect the values of areas of highly valued soil resources, by:... 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." OR as alternative relief, provide for Policy 2.2.15 d) as a standalone policy.	<ul style="list-style-type: none"> Reconsider use of the term "Avoiding". There Supports the direction provided under clauses a) and b). 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. The matters sought to be addressed by clause 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Ravensdown Works Limited	143	Amend	Amend para (a) by inserting "Where practicable" ahead of "Avoiding".	Para a) means that quarrying activity on high value soil would be prevented but urban			
Peter and Margaret Straterra	146 151	Amend Amend	Delete [Policy 2.2.15] (b). Support subject to the following amendments: "Protect <u>Maintain</u> the values of areas of highly valued soil resources, by: a) Avoiding, remedying or mitigating significant	Paragraph (b) of the policy adds nothing to what			
Te Runanga o Moeraki, Kati Huirana	154	Amend	Combine Policies 2.1.5 and 2.2.15 Ensure Kai Tahu values are taken into account in	Overlap between this policy and Policy 2.1.5 as both about managing soil values			
Dunedin City Council	156	Amend	Delete (d).	Urban development may result in the loss of			
ER Objective 2.3. Natural resource systems and their interdependencies are recognised							
Otago Peninsula	40	Support	We support this objective.	No reason given.	Support	Support	
Central Otago Wilding	49	Support	Support.	Strongly support recognition of this and the need	Support	Support	

Alliance Group Limited	56	Amend	Amend this objective so it seeks to achieve the integrated management of the natural and	<ul style="list-style-type: none"> The policies for this objective all relate to integrated management. 	Oppose	Oppose
Central Otago Environmental Society	59	Amend	Include references to proposed "fundamental values" [principles requested for Chapter B2] when considering the management of any one resource.	Will serve as a constant reminder of over-arching requirement for integration.	Support	Support
PowerNet Limited	60	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"> The policies for this objective all relate to integrated management. The human use and economic benefits from development of natural and physical resources also need to be considered. The current drafting of the objective fails to achieve this as it only refers to natural resource systems. 	Oppose	Other objectives and policies in Chapter 4 cover off on economic benefits
HW Richardson Group Limited	61	Amend	Amend this objective so it seeks to achieve the integrated management of the natural and physical resources of the region, including consideration of human use and economic benefits.	<ul style="list-style-type: none"> The policies for this objective all relate to integrated management. The human use and economic benefits from development of natural and physical resources also need to be considered. The current drafting of the objective fails to achieve this as it refers only to natural resource systems. 	Oppose	Other objectives and policies in Chapter 4 cover off on economic benefits
NZ Transport Agency	78	Amend	Amend Objective 2.3 to read: "Natural Resources systems and their interdepen	<ul style="list-style-type: none"> Amending Objective 2.3 to encompass both natural and physical resources as proposed will 		
Trustpower Limited	85	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"> The policies for this objective all relate to integrated management. The human use and economic benefits from development of natural and physical resources also need to be considered. The current drafting of the objective fails to achieve this as it only refers to natural resource systems. 	Oppose	Other objectives and policies in Chapter 4 cover off on economic benefits
The Fertiliser	110	Support	Retain Objective 2.3 as notified.	FANZ recognises the importance of maintaining	Support	Support
Wise Response Society Inc	114	Amend	Amend as follows: "Land and water ecosystem function and	<ul style="list-style-type: none"> Sustainable management requires integration across land, freshwater, estuarine and marine 	Support	Support
Director-General of	117	Amend	Amend as follows:	It is recommended to amend this objective to	Support	Support
Horticulture New	124	Amend	Retain Objective 2.3.	<ul style="list-style-type: none"> The recognition of the interdependencies of 	Support	Support
Ballance Agri-	141	Support	Adopt as notified.	Provides useful guidance and the direction	Support	Support
Pioneer Generation	142	Support	Retain as notified.	The Objective provides useful guidance at a	Support	Support
Te Runanga o Mneraki, Kati Huirapa	154	Amend	<ul style="list-style-type: none"> Amend objective to: "Seek integrated management across catchments, between 	Natural resource systems and their interdependencies should be more than	Support	Support

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Federated Farmers of New Zealand	115	Amend	Amend narrative to Objective 2.3 as follows (or words to similar effect): "Our resources are interconnected, and while the use of these resources provide for the well-being of the Otago region, 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	<ul style="list-style-type: none"> • Better to state the positive outcomes from natural resource systems rather than attempting to identify and protect these. • There is a danger of unnecessary controls. • 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. 	Support	These wording changes are not major	Support wording changes proposed by Federated Farmers
Straterra	151	Amend	Support [explanation to Objective 2.3 - page 39] subject to the following amendment [to the end of the last	<ul style="list-style-type: none"> • Mineral exploration and mining, and the use of mined and quarried minerals, are significant economic activities in Otago, are connected to 	Oppose	Federated Farmers wording can give effect to this	Oppose
EQ Policy suite 2.3. Natural resource systems and their interdependencies are recognised							
Federated Farmers of New Zealand	115	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"> • The concerns driving this policy are largely addressed in policies 2.3.1 and 2.3.2. • 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. • The RPS should focus on the management/reduction of discharges to water rather than managing land use activities. • The reference to 'nuisance effects' is an alarmingly low bar and inappropriate for a regional policy statement. 	Support in part	"Nuisance" needs to be better defined or removed entirely, as this doesn't apply at the scale of catchments and sub-catchments. If this is defined better or removed entirely the rest of the policy should stay. Federated Farmers' suggestion of catchment plans is a good one, and this could be provided either within the policy or within an additional method	Support the removal or redefinition of clause iv. Support the addition of catchment plans either as a clause in this policy or as a method. Catchment plans could implement a variety of objectives and policies under the RPS, the water plan, and the proposed biodiversity and regional pest management strategies. Fish and Game can't support the removal of the full policy though.
Name	Number	Position	Decision Requested	Reason for Decision Requested			
				<ul style="list-style-type: none"> • The reference to the maintenance or enhancement of 'values' provides no clear direction to the plan user, and is potentially onerous. 			

AgResearch Ltd	116	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</u> the use of water in supporting catchment values; and ..."	Policy should recognise that "water use" is an important value that needs to be provided for within freshwater catchments.	Oppose	Economic values are provided in Chapter 4	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Director-General of Horticulture New Zealand	117 124	Support Amend	Retain as notified. Amend Policy 2.3.3 as follows: • "c) iv. Reduce the potential for health and nuisance effects." • Add a new point "d) Provide for food production."	Provides for the coordinated management of • An integrated management approach for freshwater catchments is supported. • It is unclear why nuisance effects are included. The focus should be on adverse effects as nuisance effects are not defined in the RMA.	Support Support in part	Support "Nuisance" needs to be better defined or removed entirely, as this doesn't apply at the scale of catchments and sub-catchments. If this is defined better or removed entirely the rest of the policy should stay. Federated Farmers' suggestion of catchment plans is a good one, and this could be provided either within the policy or within an additional method	Support Support the removal or redefinition of clause iv. Support the addition of catchment plans either as a clause in this policy or as a method. Catchment plans could implement a variety of objectives and policies under the RPS, the water plan, and the proposed biodiversity and regional pest management strategies. Fish and Game can't support the removal of the full policy though.

Environmental Defence Society Incorporated	127	Amend	<p>Amend Policy 2.3.3 as follows:</p> <ul style="list-style-type: none"> • Identify how the physical characteristics of freshwater bodies in (b) relate to and are used to achieve integrated management. • Identify specific actions necessary to achieve integrated management between catchments. 	<ul style="list-style-type: none"> • 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. • The use of consistent freshwater objectives between interconnected waterbodies is supported, however the RPS contains no provisions providing for the process of developing these objectives. • The requirement to recognise morphology etc. is non-directive. It provides no guidance as to how these natural factors contribute to integrated management. • 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. 	Support in part	<p>Catchment plans, where necessary, are the best way to achieve integrated management. Fish and Game understands that the ORC may be investigating river management plans, and the water plan already has many catchment based policies, including limits and targets. Catchment plans can integrate this.</p>	<p>Support the inclusion of catchment plans as a method to achieve integrated management</p>
Ballance Agri-Nutrients Limited	141	Amend	<p>Amend as follows: "Apply an integrated management approach to activities in freshwater catchments, by: a)</p>	<ul style="list-style-type: none"> • 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 	Oppose	<p>Freshwater objectives are set by the regional plan: water, there is no need to redo this process, except</p>	<p>Maintain the notified version of the regional policy statement, except where</p>

Pioneer Generation Limited	142	Amend	<ul style="list-style-type: none"> Amend Policy 2.3.3 as follows: "Apply an integrated management approach to activities in freshwater catchments, by: <ol style="list-style-type: none"> Establishing and using consistent freshwater objectives for interconnected water bodies; and Recognising the importance of river morphology, catchment hydrology, natural processes and land cover in supporting catchment values; and Coordinating the management of land use and freshwater, to: <ol style="list-style-type: none"> Maintain or enhance freshwater values as established by the freshwater objectives; and ... Amend Method 3 accordingly (as outlined in submission). 	<ul style="list-style-type: none"> 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. The freshwater "values" referred to in clause (c) should be linked to the freshwater objectives referred to in clause (a). 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. 	Oppose	Freshwater objectives are set by the regional plan: water, there is no need to redo this process, except via the mechanisms already in place in the regional plan: water	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Te Runanga o Moeraki, Kati	154	Amend	<ul style="list-style-type: none"> Add further policies to: 	No reason given.			
Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga			<ul style="list-style-type: none"> Add new policy as (c)(v) to protect Kai Tahu values, rights and interests. Take into account the Kai Tahu philosophy and principle of Ki Uta Ki Tai (from the mountains to the sea). Require integration within and across 		Support	Support	Support
773 Need 3.1							
Te Runanga o Moeraki, Kati Huirapa	154	Amend	Amend issue to reflect that we need to take environmental constraints into account not just for	No reason given.	Support	Support	
774 Need 3.2							
Wise Response	114	Amend	<ul style="list-style-type: none"> Amend the Need associated to Objective 3.2 as to reduce their potential impacts on people's 	Wording in the Plan needs to be clear and	Support	Support	
68 Issue 3.3 - Effects of climate change							
Wise Response Society Inc.	114	Amend	Amend as follows: "Climate change will is expected to bring higher sea levels and an increa	<ul style="list-style-type: none"> Wording in the Plan needs to be clear and uncompromising. Suggested changes to the 	Support	Support	
Remarkables Park	147	Amend	Amend objectives, issue and need statements to	Objective 3.3 is supported, however in the issue	Support	Support	
775 Need 3.3							
Yellow-eyed Penguin Trust	63	Amend	Amend "Need" under Objective 3.3 as follows: "We need to have consistent guidance on sea level	No reason given.	Support	Support	
Save The Otago Peninsula (STOP)	88	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	Support	Support	
69 Issue 3.4 - Importance of adequate infrastructure							

Wise Response Society Inc	114	Amend	Amend as follows: "Aging and sub-standard, or inadequate infrastructure risks creatin	Wording in the Plan needs to be clear and uncompromising. Suggested changes to the	Support	Support	
276 Need 3.4							
278 Need 3.6							
Queenstown Lakes	95	Amend	Introduction to Chapter 4 (p.43) - Objective 3.6:	Support for local energy production and	Support	Support	
Federated Farmers of New Zealand	115	Amend	<ul style="list-style-type: none"> Amend "Need" for Objective 3.6 as follows (or words to similar effect): "We need to reduce our dependency on fossil fuels <u>encourage sustainable energy use</u> and improve our energy resilience." 	<ul style="list-style-type: none"> Objective 3.6 Fossil fuels provide significant economic and social benefits, and these should be factored into any regulatory response to the use of fossil fuels. The 'need' to reduce fossil fuels is market driven, and is largely a non-regulatory concern. Any regulatory intervention should be national, not regional. 	Oppose	Oppose	The need to reduce fossil fuel usage applies at all levels, local, regional, national, and international.
76 Objective 3.1. Protection, use and development of natural and physical resources recognises environmental constraints							
Name	Number	Position	Decision Requested	Reason for Decision Requested			
Clutha District Council	28	Oppose	<ul style="list-style-type: none"> Remove objective 3.1 Alternatively, if to be retained, substantially reword to focus on the key resilience issues such as greater self-sufficiency. 	<ul style="list-style-type: none"> 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? Technological risks are often unknown. 	Oppose	Oppose	Retain objective 3.1 as written
Alliance Group Limited	56	Oppose	Delete Objective 3.1.	<ul style="list-style-type: none"> This objective is too vague to be effective 	Oppose	Oppose	Retain objective 3.1 as written
PowerNet Limited	60	Amend	Revise to make this objective clearer or delete it.	<ul style="list-style-type: none"> This objective is too vague to be effective 	Oppose	Oppose	Retain objective 3.1 as written
HW Richardson Group	61	Amend	Amend objective to make clearer or delete it.	<ul style="list-style-type: none"> This objective is too vague to be effective and 	Oppose	Oppose	Retain objective 3.1 as written
Trustpower Limited	85	Oppose	Delete Objective 3.1, or modify it to better reflect the	<ul style="list-style-type: none"> This objective is too vague to be effective and meaningful in its implementation. 	Oppose	Oppose	Retain objective 3.1 as written
Name	Number	Position	Decision Requested	Reason for Decision Requested			
Blueskin Resilient Communities Trust	87	Oppose	Delete or amend provisions as follows: "Protection, use and development of natural and physical resources recognises environmental constraints"	<ul style="list-style-type: none"> Objective 3.1 does not add anything to the regulatory assessment framework. More appropriate to articulate concerns about 	Oppose	Oppose	Retain objective 3.1 as written
Fonterra Co-operative Group Limited	99	Oppose	Delete Objective 3.1.	The objective lacks any specific purpose or direction.	Oppose	Oppose	Retain objective 3.1 as written
Royalburn Farming Company Ltd	102	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national	Oppose	Oppose	Retain objective 3.1 as written
Walter Peak Station	103	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national	Oppose	Oppose	Retain objective 3.1 as written
natural and physical resources recognises environ							

Millbrook Country Club	104	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use	Oppose	Oppose	Retain objective 3.1 as written
Eastburn Farm	105	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use	Oppose	Oppose	Retain objective 3.1 as written
RCL Queenstown PTY Ltd	106	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use	Oppose	Oppose	Retain objective 3.1 as written
Damper Bay Estates Ltd	107	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use	Oppose	Oppose	Retain objective 3.1 as written
Halfway Bay Station	108	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use	Oppose	Oppose	Retain objective 3.1 as written
Water Tight Investments Ltd	109	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use	Oppose	Oppose	Retain objective 3.1 as written
The Fertiliser Association of New Zealand Inc.	110	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 providing for agricultural production and its transfer	Oppose	Oppose	Retain objective 3.1 as written
Wise Response Society Inc.	114	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.	Support	Support	Support amendments as requested by Wise Response.
Federated Farmers of New Zealand	115	Amend	Amend as follows (or words to similar effect): "Protection, use and development of natural and physical resources is environmentally sustainable"	As written the Objective fails to acknowledge the positive benefits of resource use. Objective should be re-written to focus on sustainability	Oppose	Oppose	Retain objective 3.1 as written
Queenstown Airport Corporation	122	Amend	Revise to make this objective clearer or delete it.	• This objective is too vague to be effective and meaningful in its implementation. • It is not clear what is meant by "environmental"	Oppose	Oppose	Retain objective 3.1 as written
Horticulture New Zealand	124	Support	Retain Objective 3.1.	Recognition of environmental constraints, such as sufficient water supply, is supported. For instance	Support	Support, recognising environmental	Retain objective 3.1 as written
Z Energy Limited, BP	128	Support	Retain Objective 3.1 without modification.	Objective 3.1 is supported.	Support	Support	Support
Soho Basin Skifield Limited	129	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use	Oppose	Oppose	Retain objective 3.1 as written
Northlake Investments Limited	130	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use	Oppose	Oppose	Retain objective 3.1 as written
Shotover Country Limited	131	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use	Oppose	Oppose	Retain objective 3.1 as written
Ayrburn Farm Developments Limited	132	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use	Oppose	Oppose	Retain objective 3.1 as written
Bridesdale Farm Developments Limited	133	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use	Oppose	Oppose	Retain objective 3.1 as written

Glencoe Station Limited	134	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of natural and physical resources recognises environ	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use	Oppose	Oppose	Retain objective 3.1 as written
Treble Cone Investment Limited	135	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of natural and physical resources recognises environ	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use	Oppose	Oppose	Retain objective 3.1 as written
Woodlot Properties Limited	136	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of natural and physical resources recognises environ	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use	Oppose	Oppose	Retain objective 3.1 as written
Henley Downs Farm Holdings Limited	137	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of natural and physical resources recognises environ	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use	Oppose	Oppose	Retain objective 3.1 as written
Real Journeys	138	Amend	Amend as follows: "Protection, <u>subdivision</u> , use and development of natural and physical resources recognises environ	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use	Oppose	Oppose	Retain objective 3.1 as written
Oceana Gold (New Zealand) Limited	140	Support	Support.	For mining this means that to sustain the activity there needs to be 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.	Support	Support the component of this that refers to Objective 3.1	Retain objective 3.1 as written
Straterra	151	Amend	Support [Objective 3.1] subject to the following amendment: "Protection, use and development of	• To avoid the sterilisation of resources that Otago will need in the future	Oppose	Chapter 4 recognises economic uses	Retain objective 3.1 as written
Te Runanga o Moeraki Kati Huirana	154	Amend	Amend objective as follows: Acknowledge that environmental	No reason given.	Support	Support	Support
282 Introduction to Objective 3.1							
Federated Farmers of New Zealand	115	Amend	• Amend narrative under Objective 3.1	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 appropriate use and allocation of water.	Support	Support	Make changes as recommended by Federated Farmers.
Straterra	151	Amend	Support [explanation to Objective 3.1 - page 47] subject to amendment [to the last sentence of the paragraph]: "For example, there should be	• To avoid the sterilisation of resources that Otago will need in the future • Council seems to be taking a NIMBY approach	Oppose	Chapter 4 recognises economic uses	Retain objective 3.1 as written
77 Policy suite 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints							
Straterra	151	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	Oppose	Chapter 4 recognises economic uses	Retain objective 3.1 as written

Otago Conservation Board	155	Amend	<ul style="list-style-type: none"> • [Acknowledge] that not all constraints are permanent, nor are all constraints known. • [Express] the potential for constraints to have 	<ul style="list-style-type: none"> • Maintain flexibility to provide scope for movement in this area as some constraints fall away as others rise. 	Support	Support	Support changes as recommended by the Otago Conservation Board
78 Policy 3.1.1 - Recognising natural and physical environmental constraints							
Clutha District Council	28	Oppose	<ul style="list-style-type: none"> • Remove policy 3.1.1. • Alternatively, if retained, substantially reword to focus on the key resilience issues such as greater self-sufficiency. 	<ul style="list-style-type: none"> • 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? • Technological risks are often unknown. 	Oppose	Oppose	Retain policy 3.1.1 as written
Alliance Group Limited	56	Oppose	Delete Policy 3.1.1.	<ul style="list-style-type: none"> • Reference to "environmental constraint" is ambiguous and should be removed. 	Oppose	Oppose	Retain policy 3.1.1 as written
PowerNet Limited	60	Oppose	Delete Policy 3.1.1.	<ul style="list-style-type: none"> • Reference to "environmental constraint" is ambiguous and should be removed. 	Oppose	Oppose	Retain policy 3.1.1 as written
HW Richardson Group Limited	61	Oppose	Delete Policy 3.1.1.	<ul style="list-style-type: none"> • Reference to "environmental constraint" is ambiguous and should be removed. 	Oppose	Oppose	Retain policy 3.1.1 as written
Contact Energy Limited	74	Amend	<ul style="list-style-type: none"> • Amend Policy 3.1.1 to read as follows: "Recognise the natural and physical environmental constraints of an area and their effect on the protection, use and 	<ul style="list-style-type: none"> • 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, 	Oppose	Oppose	Retain policy 3.1.1 as written
Aurora Energy Limited	76	Support	Retain Policy 3.1.1.	<ul style="list-style-type: none"> • Infrastructure is a significant physical resource, 	Oppose	Oppose	Retain policy 3.1.1 as written
Trustpower Limited	85	Oppose	Delete Policy 3.1.1.	<ul style="list-style-type: none"> • Reference to "environmental constraint" is ambiguous and should be removed. 	Oppose	Oppose	Retain policy 3.1.1 as written
Blueskin Resilient Communities Trust	87	Oppose	Delete or amend as follows: "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>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>	<ul style="list-style-type: none"> • Objective 3.1 does not add anything to the regulatory assessment framework. • More appropriate to articulate concerns about providing for activities with a functional necessity of a particular location in a positive way. • 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. 	Oppose	Oppose	Retain policy 3.1.1 as written
Fonterra Co-operative Group Limited	99	Oppose	Delete policy 3.1.1.	The policy lacks any specific purpose or direction.	Oppose	Oppose	Retain policy 3.1.1 as written
Otago Civil Defence Emergency	100	Support	Retain the policy (or similar wording to achieve the intent).	<ul style="list-style-type: none"> • Policy appropriate in its intent, in particular it is important to set out the types of environmental 	Support	Support	Support
Royalburn Farming Company Ltd	102	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of	No reason given.	Support	Support	These wording changes do not change the underlying intent of the policy

Walter Peak Station	103	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of <u>resources</u> an area , the <u>environmental</u> effects of	No reason given.	Support	Support	These wording changes do not change the underlying intent of the policy
			adverse effects from the proposed activity/land				
Millbrook Country Club	104	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of	No reason given.	Support	Support	These wording changes do not change the underlying intent of the policy
Eastburn Farm	105	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of	No reason given.	Support	Support	These wording changes do not change the underlying intent of the policy
RCL Queenstown PTY Ltd	106	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of	No reason given.	Support	Support	These wording changes do not change the underlying intent of the policy
Damper Bay Estates Ltd	107	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of	No reason given.	Support	Support	These wording changes do not change the underlying intent of the policy
Halfway Bay Station	108	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of <u>resources</u> an area , the <u>environmental</u> effects of	No reason given.	Support	Support	These wording changes do not change the underlying intent of the policy
			and the <u>environmental</u> effects of those activities on those constraints, including with particular recognition of				
Water Tight Investments Ltd	109	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of	No reason given.	Support	Support	These wording changes do not change the underlying intent of the policy

The Fertiliser Association of New Zealand Inc.	110	Oppose	<ul style="list-style-type: none"> Delete Policy 3.1.1 or alternatively, Amend as follows: "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, including: a) ..." 	<ul style="list-style-type: none"> 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. 	Support in part	Support the component of this that refers to managing constraints through innovation and technological solutions	Amend based on Fertiliser Association's request
Waitaki Irrigators Collective Limited	113	Amend	Amend the wording "recognise the natural and physical	Very difficult to understand as currently written. It should be amended to aid understanding.	Support in part		Amend based on WICI's request
Wise Response Society Inc.	114	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints and limits and acts accordingly	<ul style="list-style-type: none"> Wish to see specific reference to the precautionary approach. Wording in the Plan needs to be clear and uncompromising. Suggested amendments give 	Support	Support	Support
Federated Farmers of New Zealand	115	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, while providing for the reasonable use of these resource s, including: ..."	<ul style="list-style-type: none"> 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. This policy should also provide scope for those resources to be used to provide for the economic and social wellbeing of Otago's residents. 	Oppose	Chapter 4 recognises economic uses	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Otago Water Resource	121	Support	Support Policy 3.1.1a).	No reason given.	Support	Support	Support
Queenstown Airport Corporation	122	Oppose	Delete Policy 3.1.1.	<ul style="list-style-type: none"> Reference to "environmental constraint" is ambiguous and should be removed. 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. 	Oppose	Oppose	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Horticulture New Zealand	124	Amend	Amend Policy 3.1.1 e) as follows: "e) The functional necessity for the activity to be located where there are significant constraints such as adverse effects on existing activities."	<ul style="list-style-type: none"> The weighing of individual policies that One of the constraints listed is the functional necessity for the activity to be located where there are significant constraints. While the concept is supported there needs to be guidance as to what determines "significance". One such constraint is impact on existing activities. 	Support	Support	Support changes as recommended by Horticulture New Zealand

Z Energy Limited, BP Oil NZ Limited and Mobil Oil NZ Limited	128	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 necessity <u>need</u> for the activity to be located..."	<ul style="list-style-type: none"> • The Oil Companies support the recognition of natural and physical environmental constraints provided at Policy 3.1.1. • d) should explicitly recognise the role of mitigation in limiting exposure of activities to hazard risks. • 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. 	Support in part	This is better placed in the parts of the RPS that deal with natural hazards	Make changes as recommended by the oil companies, but in the hazard sections.
Soho Basin Skifield Limited	129	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of <u>resources</u> an area , the <u>environmental</u> effects of	No reason given.	Support	Support	These wording changes do not change the underlying intent of the policy
Northlake Investments Limited	130	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of	No reason given.	Support	Support	These wording changes do not change the underlying intent of the policy
Shotover Country Limited	131	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of	No reason given.	Support	Support	These wording changes do not change the underlying intent of the policy
Ayrburn Farm Developments Limited	132	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of <u>resources</u> an area , the <u>environmental</u> effects of	No reason given.	Support	Support	These wording changes do not change the underlying intent of the policy
			constraints, including <u>with particular recognition of :</u>				
Bridesdale Farm Developments Limited	133	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of	No reason given.	Support	Support	These wording changes do not change the underlying intent of the policy

Glencoe Station Limited	134	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of	No reason given.	Support	Support	These wording changes do not change the underlying intent of the policy
Treble Cone Investment Limited	135	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of	No reason given.	Support	Support	These wording changes do not change the underlying intent of the policy
Woodlot Properties Limited	136	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of	No reason given.	Support	Support	These wording changes do not change the underlying intent of the policy
Henley Downs Farm	137	Amend	Amend as follows:	No reason given.			
			Recognise the natural and physical environmental constraints of <u>resources</u> an area , the <u>environmental</u> effects of those constraints on activities <u>utilising those reso</u>		Support	Support	These wording changes do not change the underlying intent of the policy
Real Journeys	138	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints Recognise the natural and physical environmental constraints of	No reason given.	Support	Support	These wording changes do not change the underlying intent of the policy
Ravensdown Works Limited	143	Support	Retain locational necessity as a factor.	Some activities have significant locational constraints that should be given weight when determining if they are appropriate.	Support	Support	Support
Remarkables Park Limited and Queenstown Park Limited	147	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.	Support in part	Support if this statement says, "a functional necessity for the location of an existing activity"	Support with changes recommended

Straterra	151	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 proposed <u>inappropriate</u> activity/land use; and ... e) The functional necessity for the activity to be located where there are significant constraints, e.g., mineral, aggregate and petroleum resources."	<ul style="list-style-type: none"> 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 RMA contains references 	Oppose	Oppose the introduction of further significance tests	Maintain the notified version of the regional policy statement, except where amendments have been proposed in Fish and Game's initial submission.
Te Runanga o Moeraki, Kati Huirapa	154	Amend	Amend policy as follows: • "a) The availability of natural resources.	What is the level of understanding of current and likely future environmental constraints? This	Support	Support	Support
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou	154	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	What is the level of understanding of current and likely future environmental constraints? This policy should provide more guidance for decision-makers.	Support	Support	Support
98 Policy 3.2.8. Applying a precautionary approach							
Otago Civil Defence W.G. Nagle	100 111	Support Amend	Retain policy as notified (or similar wording to Amend (to describe the precautionary approach.)	This will contribute to increasing the resilience of <ul style="list-style-type: none"> The "precautionary approach" is not described anywhere. NZ is a Party to the Convention on Biological Diversity. 	Support Support	Support Support	Support Support
Wise Response Society Inc.	114	Amend	Amend as follows: "Policy 3.2.8 Applying thea 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 th at risk.	<ul style="list-style-type: none"> Wish to see specific references to the precautionary principle, where scientific uncertainty exists. Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth. 	Support	Support	This gives effect to the relief sought by W G Nagle.
97 Objective 3.3. Otago's communities are prepared for and able to adapt to the effects of climate change							
The Southern District Blueskin Resilient Queenstown Lakes Otago Civil Defence W.G. Nagle Wise Response Federated Farmers of Director-General of Conservation Otago and Central	51 87 95 100 111 114 115 117 118	Support Support Amend Support Amend Amend Support Support Support	Support. Support. Consider including recognition that extreme Retain policy as notified (or similar wording to Amend (to recognise the likely biological consequences of climate change.) Amend as follows: "Objective 3.3 Otago's Adopt as proposed. Retain as notified. No amendments required.	Submitter is fully supportive of this objective as Climate change is a significant risk to Objective does not recognise the increasing <ul style="list-style-type: none"> Otago CDEM is concerned with climate change, There is no recognition of the likely biological consequences of climate change. It is likely that invasive species that are Wording in the Plan needs to be clear and <ul style="list-style-type: none"> It is important that communities are prepared No reason given Supports the ORC on determining the likely	Support Support Support Support Support Support Support Support Support	Support Support Support Support Support Support Support Support Support	Support Support Support Support Support Support Support Support Support

Dunedin City Council	156	Amend	Amend objective to add reference to the fact that Otago's contribution to reducing global	Reducing global greenhouse gas emissions will reduce the extent of climate change and the	Support	Support	Support
784 Introduction to Objective 3.3							
Wise Response Society Inc.	114	Amend	• Amend the Need associated to Objective 3.3 as follows: "We need to have consistent guidance on as follows:	Wording in the Plan needs to be clear and uncompromising. Suggested changes to the than 'impacts.' Clarification is sought as to what	Support	Support	Support
93 Policy suite 3.3 - Otago's communities are prepared for and able to adapt to the effects of climate change							
Christopher Mark	12	Amend	Remove "this figure must be taken into account	No reason given.	Oppose	Oppose	Oppose
Clutha District Council	28	Amend	Address policy gap in policy suite to achieve Objective 3.3.	Supporting policies do not address the preparedness element of Objective 3.3.	Support	Support	Support
Phil Murray	42	Amend	Include policies that address the cause of climate change and reduce emission that affect the climate.	<ul style="list-style-type: none"> Proposed policies inadequate as do not address the causes of climate change. It is necessary and appropriate that climate change be addressed at all levels of government. 	Support	Support. This reflects on Fish and Game's requested relief to reinstate the finite nature of fossil fuels in the RPS	Support
Bus Users Support Group Otepoti-Dunedin (Bus Go Dunedin)	44	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.	Support	Support. This reflects on Fish and Game's requested relief to reinstate the finite nature of fossil fuels in the RPS	Support
Lynne Stewart	47	Amend	Include policies that address the cause of climate	• Proposed policies inadequate as do not address	Support	Support	Support
Anna Hughes	50	Amend	<ul style="list-style-type: none"> 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 over the next 100 years will be responsibly addressed." Include statements that show thinking and action 	<ul style="list-style-type: none"> There seems to be a strong emphasis on adaptation and mitigation. Climate change is of no benefit to future Otago residents, we're all part of a global community. For future generations it is essential that the ORC focus on decreasing human contribution to 	Support	Support	Support
Patricia Scott	65	Amend	Address mitigation of climate change separately from adaptation, including by: <ul style="list-style-type: none"> Reducing ORC's own carbon emissions; Assisting communities in reducing their carbon emissions through good public transport and reducing car use; 	<ul style="list-style-type: none"> Although ORC recognises the importance and severity of climate change, mitigation is not dealt with in any detail. ORC ought to be doing all it can to prevent climate change happening or reduce the severity of its effects. 	Support in part	Support where these issues can be addressed in the context of an RPS. Not all can.	Support
Patricia Scott	65	Support	No decision requested.	Support taking a precautionary approach.	Support	Support	Support
Blueskin Resilient	87	Support	Support policy suite subject to amendment to	• Climate change is a significant risk to	Support	Support	Support
Wise Response Society Inc.	114	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"	• 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	Support	Support	Support
Otago and Central	118	Support	No amendments required.	Supports the ORC on determining the likely			
Dunedin City Council	156	Amend	Merge Policies 3.3.1 and 3.3.2.	The reason to have a separate policy for sea level	Support	Support	Support

Dunedin City Council	156	Amend	[Add to both policies] a new provision as follows:	Adaptation and mitigation are not mutually	Support	Support	Support
94 Policy 3.3.1 - Adapting to, or mitigating the effects of, sea level rise							
J.C.F. Rowley	48	Did not	• Recognise that even if presumption is correct,	• ORC role is to help mitigate adverse effects, not	Oppose	Oppose	Oppose
Peter Foster	67	Oppose	Oppose.	The basis for the sea level rise used by the ORC is wrong: • ORC's sources of information are not experts in the field of climate change and sea level rise (Dr. Renwick & Dr Wratt, NIWA, Dr Wright and Dr Gluckman). • In working group 1 (Science report), there is not	Oppose	Oppose	Oppose
Director-General of Conservation	117	Support	Retain as notified.	Policy 3.3.1 is supported as it is consistent with Policy 24 of the NZCPS 2010.	Support	Support	Support
Dunedin City Council	156	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 (Otago Metric Datum)</u>	No reason given.	Support	Support	Support
95 Policy 3.3.2 - Adapting to, or mitigating the effects of, climate change							
Clutha District Council	28	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.	Support	Support. This is an important clarification	Support
Egg Producers Federation of New Zealand	29	Amend	Add a sub-clause to Policy 3.3.2 as follows: <u>Policy 3.3.2.d)</u> <u>Acknowledging that some activities are more resilient and able</u>	• 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			
Blueskin Resilient	87	Amend	Amend Policy 3.3.2 c) as follows: " <u>Enable and</u>	• Climate change is a significant risk to	Support	Support	Support
Wise Response Society Inc.	114	Amend	Change the header as follows: " <u>Adapting to, or mitigating the effects of physical limits that can</u>	• Climate change is well advanced and the prospects of life as we know it are small if the	Support	Support	Support
				• Wording in the Plan needs to be clear and			
Director-General of Conservation	117	Support	Retain as notified.	Policy is consistent with the intent of Policy 3 of the NZCPS 2010.	Support	Support	Support
Remarkables Park	147	Amend	Retain Policy 3.3.2(c), and improve its wording to	This policy is supported and should be built upon	Support	Support	Support
Contact Energy Limited	74	Amend	Amend Policy 3.4.2 g) to read as follows: "g) Protect the	• The RPS in general fails to recognise that infrastructure (particularly significant	Oppose	Oppose	Retain as notified
Name	Number	Position	Decision Requested	Reason for Decision Requested			
Contact Energy Limited	74	Amend	• Amend 3.5.3 a) to read as follows: "a) Restricting <u>Preventing</u> the establishment of activities that may result in reverse sensitivity effects" • Amend Policy 3.5.3 b) and c) to read as follows:	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.	Oppose	Oppose	Retain as notified.
107 Objective 3.6 - Energy supplies to Otago's communities are secure and sustainable							
Clutha District Council	28	Support	No change.	This objective is critical for the functioning of the region.	Support	Support	Support
Save The Otago	88	Support	Endorse the "Need" associated to Objective 3.6 (p.	Endorse recognition of this need and the steps to	Support	Support	Support

Transpower New	97	Support	Retain objective as drafted.	Supports the intent of this objective as it	Support	Support	Support
Fonterra Co-operative	99	Support	Retain Objective 3.6 as notified.	A reliable energy supply is critical to the	Support	Support	Support
Otago Civil Defence	100	Support	Retain as notified or enhance if necessary to give	The security of energy supply during hazard	Support	Support	Support
Horticulture New Zealand	124	Support	Retain Objective 3.6.	No reason given.	Support	Support	Support
Remarkables Park	147	Support	Amend objectives, issue and need statements to	Submitter supports Objective 3.6's recognition	Support	Support	Support
Te Runanga o Moeraki, Kati Huirapa	154	Amend	Add to description of issue that energy generation and transmission must still avoid adverse effects	To ensure energy supplies are managed in a way that protects environmental and cultural values.	Support	Support	Support
2.97 Introduction to Objective 3.6							
NZ Transport Agency	78	Amend	Amend the second paragraph of introduction to	Introduction to Objective 3.6 should recognise			
Wise Response Society Inc.	114	Amend	Amend the introduction to Objective 3.6 (p.61) as follows: "The social and economic well-being of Otago's people	• Wording in the Plan needs to be clear and uncompromising. Suggested wording changes give the plan more teeth.	Support	Support	Support
100 Policy 3.6.1 - Using existing renewable electricity generation structures and facilities							
Clutha District Council	28	Support	Support in principle, but check the need for this	• Given the current disaggregated electricity	Support	Support	Support
Te Runanga o Moeraki, Kati Huirapa	154	Amend	Reword to: "Give preference to the use of existing structures	To provide for the relocation of structures and facilities that may currently be located in	Support	Support	Support
110 Policy 3.6.2 - Promoting small scale renewable electricity generation							
Clutha District Council	28	Support	No change.	This policy contributes to achieving other policies	Support	Support	Support
Blueskin Resilient Communities Trust	87	Amend	Amend policy 3.6.2 as follows: "Promote and enable small scale renewable electricity generation activities that: a) Increase the local community's resilience and	• Support policy subject to minor amendments to make provisions more enabling for small scale renewable development. • Enabling small scale renewable generation	Support	Support	Support
Queenstown Lakes	95	Support	Support	Support the encouragement of small scale	Support	Support	Support
Otago Civil Defence Emergency	100	Support	Retain policy as notified (or similar wording to achieve desired relief).	• Support policies which encourage communities to become self sufficient as this increases	Support	Support	Support
Te Runanga o Moeraki, Kati Huirapa	154	Amend	• Amend policy to: "c) Protect Kai Tahu values, rights and interests"	Need to be clear that this policy does not advocate for electricity generation at the expense	Support	Support	Support
111 Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities							
Name	Number	Position	Decision Requested	Reason for Decision Requested			
PowerNet Limited	60	Amend	Amend the policy as follows: " Enable the development of new and protect the generation capacity of existing nationally or regionally significant renewable electricity generation activities, by: ... b) Restricting Avoiding the establishment of those activities that may result in reverse sensitivity effects."	• Support the protection of the generation capacity of existing nationally or regionally significant renewable electricity generation activities. • This policy also needs to enable the development of such activities. • 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).	Oppose	Oppose the enabling of the development of anything other than small scale hydroelectric facilities	Retain as notified.

Contact Energy Limited	74	Amend	<ul style="list-style-type: none"> 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;" Amend 3.6.3 b) to read as follows: "b) Restricting <u>Preventing</u> the establishment of those activities that may result in reverse sensitivity effects;" 	<ul style="list-style-type: none"> Minor amendments to a) and b) to give effect to the National Policy Statements for Freshwater and Renewable Electricity Generation. 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. b) needs strengthening to avoid reverse sensitivity effects. 	Oppose	Oppose the enabling of the development of anything other than small scale hydroelectric facilities	Retain as notified.
Sir Alan Mark	77	Support	Supported.	<ul style="list-style-type: none"> Relates to minimising the emissions of greenhouse gases. Public relations and education of the general public will be an important aspect of implementing these policies. 			
Meridian Energy Limited	82	Amend	Amend as follows: "Protect the generation capacity of nationally or regionally significant renewable electricity generation activities, by:	Clause (d) should be re-ordered to aid interpretation of the policy.	Oppose	Oppose the enabling of the development of anything other than small scale hydroelectric facilities	Retain as notified.
			[...] c) <u>Assessing the significance of adverse effects on the</u>				
Trustpower Limited	85	Amend	Amend the policy as follows: " <u>Enable the development of new and</u> protect the generation capacity of <u>existing</u> nationally or	<ul style="list-style-type: none"> Support the protection of the generation capacity of existing nationally or regionally significant renewable electricity generation 	Oppose	Oppose the enabling of the development of anything other than small	Retain as notified.
1.14 Policy 3.6.6 - Reducing long term demand for fossil fuels							
Clutha District Council	28	Amend	Amend part b) ii. to include "where available" after	Not all urban areas are serviced by public	Support	Support	Support
Herbert Heritage Group	41	Amend	<ul style="list-style-type: none"> Amend name of Policy 3.6.6 as follows: Reducing <u>long term demand for fossil fuels</u>. 	No reason given.	Support	Support	Support
Bus Users Support Group Otepoti-	44	Support	<ul style="list-style-type: none"> Support the inclusion of public transport as a means to help achieve this policy. 		Support	Support	Support
The Southern District Health Board	51	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 e</u>	<ul style="list-style-type: none"> Promoting active transport options, favouring alternative lower emission fuels (renewable energy sources), and promoting alternative energy sources such as electric and hybrid 	Support	Support	Support
Hampden Community Energy Inc	64	Amend	<ul style="list-style-type: none"> Ensure there is strong policy to make non-carbon based transport and public transport more attractive and practical alternatives in towns and across the 	<ul style="list-style-type: none"> One of the ways we can reduce our carbon footprint is to use transport alternatives to the petrol private vehicle. We need a backup to the private vehicle that 	Support	Support	Support
Queenstown Lakes	95	Amend	Policy address the need to consider public	<ul style="list-style-type: none"> Public transport networks and facilities should 	Support	Support	Support

Wise Response Society Inc.	114	Amend	Amend as follows: "Policy 3.6.6 Reducing long term demand for fossil fuels Reduce the long term demand for fossil fuels from Otago's communities, by:	<ul style="list-style-type: none"> • Policy needs a radical rethink to reflect urgent need to reduce greenhouse gasses and integrate accordingly with other policies. • Policy as written currently proposes a suite of weakly-worded planning measures with very 	Support	Support	Support
Environmental Defence Society	127	Amend	Include additional policies addressing / providing a course of action for specific freshwater issues	<ul style="list-style-type: none"> • Land use management for achieving freshwater outcomes should not be limited to drv 	Support	Support	
1.38 Issue 1.1 - Insufficient access to areas of value							
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Amend	Amend issue to acknowledge that in some cases, public access is a threat to Kai Tahu values of sensitive places.	No reason given.	Support in part	Where it is possible to identify, at least generally, sensitive areas, such as waahi tapu, then these should be identified	Can support if areas have some spatial definition, although the sensitivity of this issue is understood by Fish and Game
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki,	154	Amend	Amend 'Need' (in Chapter overview, relating to Objective 4.1) to include: <ul style="list-style-type: none"> • Provide for Kai Tahu access to their sites of 	Concern that description of 'need' implies that public access can only be improved through subdivision or development.	Support	Support	Support
1.41 Issue 1.4 - Efficient use and finite resources							
Royalburn Farming	102	Amend	Amend as follows: "Many	No reason given.	Support	Support	Support
Walter Peak Station	103	Amend	Amend as follows: "Many	No reason given.	Support	Support	Support
Milfbrook Country	104	Amend	Amend as follows: "Many	No reason given.	Support	Support	Support
Eastburn Farm	105	Amend	Amend as follows: "Many	No reason given.	Support	Support	Support
RCL Queenstown PTY	106	Amend	Amend as follows: "Many	No reason given.	Support	Support	Support
Damper Bay Estates	107	Amend	Amend as follows: "Many	No reason given.	Support	Support	Support
Halfway Bay Station	108	Amend	Amend as follows: "Many	No reason given.	Support	Support	Support
Water Tight	109	Amend	Amend as follows: "Many	No reason given.	Support	Support	Support
Federated Farmers of New	115	Amend	Amend as follows (or words to similar effect):	<ul style="list-style-type: none"> • Objective 4.4 would best be met by providing better recognition of the positive outcomes 	Support in part	There are limits to these resources and whilst they can be appropriately managed, generating positive outcomes, there are still limits	Support provided the recognition of the finite nature of resources remains
Soho Basin Skifield	129	Amend	Amend as follows: "Many	No reason given.	Support	Support	Support
Northlake	130	Amend	Amend as follows: "Many	No reason given.	Support	Support	Support
Shotover Country	131	Amend	Amend as follows: "Many	No reason given.	Support	Support	Support
Ayrburn Farm	132	Amend	Amend as follows: "Many	No reason given.	Support	Support	Support

Bridesdale Farm	133	Amend	Amend as follows: "Many	No reason given.	Support	Support	Support
Glencoe Station	134	Amend	Amend as follows: "Many	No reason given.	Support	Support	Support
Treble Cone	135	Amend	Amend as follows: "Many	No reason given.	Support	Support	Support
Woodlot Properties	136	Amend	Amend as follows: "Many	No reason given.	Support	Support	Support
Henley Downs Farm	137	Amend	Amend as follows: "Many	No reason given.	Support	Support	Support
Real Journeys	138	Amend	Amend as follows: "Many	No reason given.	Support	Support	Support
Remarkables Park Limited and	147	Amend	Amend the objective and its associated issues	The issue does not seem to relate to the objective: the objective is to enable the use of	Support	Support	Support
795 Need 4.4							
Federated Farmers of New Zealand	115	Amend	<ul style="list-style-type: none"> Amend "Need" for Objective 4.4 as follows (or words to similar effect): "We need to provide for efficient allocation and use of these resources to maximiseenable socio-economic and cultural benefits, as well as sustain e nvironmental wellbeing." 	<ul style="list-style-type: none"> It is not appropriate for the RPS to attempt to define what is 'efficient' allocation, nor to decide how to 'maximise socio-economic' wellbeing. 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. 	Oppose	The efficiency definition in this policy reflects what is in current practice through the water plan, and does not introduce any new tests	Retain as notified
Te Runanga o Moeraki, Kati Huirapa	154	Amend	Reword Need [in Chapter overview, relating to Objective 4.4] as follows:	Cultural wellbeing is as important as the environmental wellbeing of the environment.	Support	Support	Support
147 Issue 4.5 - Adverse effects from the use of Otago's natural and physical resources							
Matthew Sole	75	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	Otago's areas of biodiversity, natural ecosystems are under threat, as well as Otago's significant areas of biodiversity.	Oppose	The issue needs to refer to ecosystems, biodiversity, as well as indigenous biodiversity. It	Amend based on Fish and Game's relief
Forest and Bird NZ	98	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.	Oppose	The issue needs to refer to ecosystems, biodiversity, as well as indigenous biodiversity. It is the overall functioning of the environment that matters	Amend based on Fish and Game's relief
144 Objective 4.1 - Public access to areas of value to the community is maintained or enhanced							
Clutha District Council	28	Support	No change.	CDC supports this Objective and provides for it in the current District Plan.	Support	Support	Support

Federated Farmers of New Zealand	115	Support	Adopt Objective 4.1 as proposed.	<ul style="list-style-type: none"> • Submitter supports the objective's focus on development and subdivision. • 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. 	Support in part	The new Health and Safety Act is much more specific than the old Act about liability for health and safety for visitors accessing private land. In most cases where the landholder is not undertaking work, there is no liability risk to the owners	Support with a definition about risk and liability based off the new Health and Safety Act
Director-General of Conservation	117	Support	Retain as notified	Objective is consistent with Policy 19 of the NZCPS 2010.	Support	Support	Support
Heritage New Zealand Pouhere Taonga	120	Support	Adopt.	<ul style="list-style-type: none"> • Generally supports public access to heritage places and sites where appropriate. • Recognises that it may not always be culturally 	Support	Support	Support
297 Introduction to Objective 4.1							
Yellow-eyed Penguin	63	Support	Support the statement: "enhancing access to the	Based on trips with visitors to reserves, the	Support	Support	Support
Waitaki District Council	70	Amend	Remove the reference to improving access to "sites of cultural and historic significance" from the	<ul style="list-style-type: none"> • The only requirement to provide access in RMA is in Section 6(d): "the maintenance and 	Support	Support	Support
145 Policy suite 4.1 - Public access to areas of value to the community is maintained or enhanced							
Remarkables Park Limited and Queenstown Park	147	Amend	<ul style="list-style-type: none"> • Retain objective and policy that supports provision of public access. • This should be extended to provide for its 	Maintenance and enhancement of public access are important.	Support	Support	Support
146 Policy 4.1.1 - Maintaining and enhancing public access							
Name	Number	Position	Decision Requested	Reason for Decision Requested			
Clutha District Council	28	Support	No change.	CDC supports this Objective and provides for it in the current District Plan.	Support	Support	Support
John Park	31	Did not	Ensure people can use the river for recreation.	On the north bank of the Kakanui River, some	Support	Support	Support
Angus Mackay	33	Amend	<ul style="list-style-type: none"> • More access to the countryside across farmland, akin to the UK model of "mutual respect" between farmer and public. • Farmers should receive incentive from the CDC 	<ul style="list-style-type: none"> • Makes NZ scenery more interesting and accessible to public - too much bush/trees have been stripped away for the sake of commercial gain 	Support	Support	Support

KiwiRail Holdings Limited	69	Support	Retain Policy 4.1.1.(a) as notified.	<ul style="list-style-type: none"> The provision of public access across rail structures over waterbodies can result in health and safety risks. Recognition that in some instances restrictions on public access is appropriate, is therefore supported. 	Support in part	The new Health and Safety Act is much more specific than the old Act about liability for health and safety for visitors, accessing private land, which can include network utilities such as rail	Support with a definition about risk and liability based off the new Health and Safety Act
Waitaki District Council	70	Amend	Delete "...and areas of cultural or historic significance...".	<ul style="list-style-type: none"> 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." There is no ability to maintain or enhance public access to areas of cultural or historic significance. 	Oppose	The RPS should not limit. Section 6(d) is a matter of national importance, not an overall limitation on the scope of providing public access	Retain as notified
Aurora Energy Limited	76	Amend	Add a new clause as follows: "c) ...; <u>or</u>	Public access may also need to be restricted in	Oppose	Oppose	Retain as notified
McKeague Consultancy Ltd	89	Amend	Amend to provide greater clarity as to how competing values	It is unclear how this policy might impact on water use and storage — how these sometimes	Oppose	Oppose	Retain as notified
Fonterra Co-operative	99	Amend	Include an additional clause to read:	Public access may not be appropriate or desirable	Oppose	Oppose	Retain as notified
Royalburn Farming	102	Amend	Amend as follows: "Maintain and , where possible,	No reason given.			
Heritage New Zealand Pouhere Taonga	120	Support	Adopt.	<ul style="list-style-type: none"> Generally supports public access to heritage places and sites where appropriate. Recognises that it may not always be culturally 	Support	Support	Support
Ravensdown Works Limited	143	Amend	Insert new para (d) " <u>Protect the economic operations of existing commercial or industrial activity.</u> "	<ul style="list-style-type: none"> Support enhancing public access where possible The factors for restricting access should be expanded to include existing development/industry. 	Oppose	The RPS needs to enable, not reduce public access on public land.	Retain as notified
Peter and Margaret Hore	146	Amend	Amend to provide greater clarity as to how competing values and uses might be weighed	It is unclear how this policy might impact on water use and storage — how these sometimes			
Dunedin City Council	156	Amend	• Clarify what a "sensitive natural area" is, and	To clarify in policy and methods what a "sensitive	Support	Support	Support
156 Policy 4.3.2 - Managing land use in dry catchments							
Taranaki Smith	17	Support	I support extra care being taken in these areas with	These efforts will preserve and enhance dry areas	Support	Support	Support
Bruce Lambie	19	Support	Need to protect tussock grasslands.	• These are iconic to Otago.	Support	Support	Support
Clutha District Council	28	Support	No change.	This policy correctly deals with a natural resource	Support	Support	Support

Central Otago District Council	37	Oppose	Delete Policy 4.3.2.	Managing land use change in dry catchments to avoid any significant reduction in water yield is inappropriate.	Oppose	Much of the tussock land under threat from changes is in the Central Otago District, and the District Council needs to be prepared to manage the issue, in conjunction with the community	Retain as notified
Anna Hughes	50	Amend	Any changes of land use that reduce available	Strong likelihood of severe droughts and floods	Support	Support	Support
Central Otago	59	Amend	Add:	Ensures proposed land use is integrated with	Support	Support	Support
Peter Hore	66	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:	No reason given.	Support	Support	Support
Waitaki District Council	70	Amend	<ul style="list-style-type: none"> Define the Dry catchments in a Schedule to the RPS or specify a methodology whereby those catchments can be identified. Amend Method 4 to Policy 4.3.2 to "Regional Plan". 	<ul style="list-style-type: none"> There is no Schedule of Dry Catchments or a methodology for defining Dry Catchments. Method 6 requires TAs to manage forestry or minimising conversion of tussock grasslands within those undefined catchments. The TAs have no expertise in managing water quantity. This role belongs to Regional Councils under s30 of the RMA. As TAs would refer to ORC for guidance on the 	Support	Support a methodology for determining dry catchments, and ensuring that the ORC undertake this role under s30.	Support
Matthew Sole	75	Support	<ul style="list-style-type: none"> Retain. Promote and encourage, if not regulate, land uses that reduce biomass such as burning and 	<ul style="list-style-type: none"> Support the proposals to manage land use in dry catchments and to avoid reduction in water yields, and methods requiring local authorities to 	Support	Support	Support
Rayonier Matariki Forests Limited	84	Amend	Amend Policy 4.3.2a) so that it does not single out forestry as follows: "a) Restricting any extension of forestry activities within those catchments that would result in a significant reduction in water yield as it fails to take into account the significant	<ul style="list-style-type: none"> 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 	Oppose	Oppose	Oppose

McKeague Consultancy Ltd	89	Amend	Finish policy after "yield" and delete (a) and (b).	<ul style="list-style-type: none"> • Policy too specific in its focus on 2 issues only - forestry and conversion of tussock grasslands - without properly addressing either. • Other activities/issues can affect water yield, e.g. wilding pine spread from existing forest. • Policy should be more general, and other plans should then address specific issues affecting dry catchments in more detail. 	Oppose	The activities that affect water yield are not overly broad, they are the conversion of tussock to pasture, the spread of wilding pines, and plantation forestry. The list is specific enough to be included in the policy	Retain as notified
Forest and Bird NZ	98	Support	Retain (a) and (b).	<ul style="list-style-type: none"> • Pleased to see recognition of the need to manage land to protect water yield. 	Support	Support	Support
Federated Farmers of New Zealand	115	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 where the impacts on water yield are likely to be significant."	<ul style="list-style-type: none"> • The policy, as written, is too directive. • 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. 	Support in part	Support a methodology for determining dry catchments, and ensuring that the ORC undertake this role under s30.	Support
Director-General of Conservation	117	Amend	Amend as follows: "Manage land use change in dry catchments, to avoid any significant reduction in water yield, by:	<ul style="list-style-type: none"> • The policy recognises the ecosystem service provided by tussock grasslands in maintaining water quantity in certain catchments. 	Support	Support	Support
Environmental Defence Society Incorporated	127	Amend	Amend Policy 4.3.2 as follows: • Amend the chapeau to require avoidance of permanent reduction in water yield. Identify other activities requiring management in	<ul style="list-style-type: none"> • The management of dry catchments is strongly supported. This is an important course of action to ensure that freshwater quantity objectives 	Support	Support	Support
Peter and Margaret Hore	146	Amend	Finish policy after "yield" and delete (a) and (b).	<ul style="list-style-type: none"> • Policy too specific in its focus on 2 issues only - forestry and conversion of tussock grasslands - without properly addressing either. • Other activities/issues can affect water yield, e.g. wilding pine spread from existing forest. • Policy should be more general, and other plans should then address specific issues affecting dry catchments in more detail. 	Oppose	The activities that affect water yield are not overly broad, they are the conversion of tussock to pasture, the spread of wilding pines, and plantation forestry. The list is specific enough to be included in the policy	Retain as notified

Little Valley Station Ltd	148	Amend	Remove clause 4.3.2 b).	<ul style="list-style-type: none"> 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. Current research into the part tussock grasslands plays in water harvesting and freshwater quality is not conclusive and therefore cannot be supported. 	Oppose	Current research supports the retention of tussock grasslands. The debate is about the mechanism by which tussocks capture water, either from fog or low evapotranspiration. Their importance is not disputed, neither in New Zealand or internationally	Retain as notified
Landpro Limited	150	Oppose	Oppose	<ul style="list-style-type: none"> Questions whether any catchment can be considered to be 'dry' and therefore require the level of regulatory approach adopted through 	Oppose	Oppose	Retain as notified
Straterra	151	Amend	Support subject to the following amendments: "Manage land use change in dry catchments, to avoid any significant reduction in water yield, by: a)	<ul style="list-style-type: none"> If forestry led to more overall economic activity, despite lower water yield, then, this may be a better use of land. If reduced water yield were to affect 	Oppose	Oppose	Oppose
Dunedin City Council	156	Amend	<ul style="list-style-type: none"> Add "Promoting the planting of tussock grasslands and other high water yielding species". Add an associated method 	<ul style="list-style-type: none"> If forestry is to be discouraged, then it is suggested that species that increase water yield should be encouraged 	Support	Support	Support
163 Policy 4.4.1 - Ensuring efficient water allocation and use							
Clutha District Council	28	Amend	Amend "b) Requiring the development or upgrade of infrastructure that increases use efficiency	<ul style="list-style-type: none"> Council is concerned that the end use of water from its supplies is largely outside of its control 	Support	Support	Support
Central Otago	59	Amend	Add a new sub-paragraph e) reading	Note difference from Policy 4.4.3 which is	Support	Support	Support
Contact Energy Limited	74	Amend	Add a new e) as follows: "e) in making allocation decisions assess potential conflicts between resource users and ensure	<ul style="list-style-type: none"> The policy does not establish a basis for the allocation of water including managing conflicts between resource users or adverse effects on existing users. 	Support	Support	Support
			there is no derogation of existing lawfully establish	<ul style="list-style-type: none"> AER 4.4 anticipates that there will be fewer 			
Matthew Sole	75	Amend	<ul style="list-style-type: none"> Include new sub para e): "Efficiency of water allocation and use taking into account fundamental principles and preserving environmental values" 	<ul style="list-style-type: none"> Large storage lakes can inundate significant aquatic and terrestrial indigenous biodiversity and result in adverse visual effects (e.g., 	Support	Support	Support
Sir Alan Mark	77	Support	Supported.	<ul style="list-style-type: none"> Support as emphasises the importance of "water harvesting" and of "efficient water allocation and use". 	Support	Support	Support
Meridian Energy	82	Amend	Amend (b) as follows: "b) Requiring the	While seeking the increased efficiency of the	Support	Support	Support

McKeague Consultancy Ltd	89	Amend	<ul style="list-style-type: none"> Amend (b) by replacing "requiring" with "give preference to..." Amend (c) to: "Encouraging collective coordination and collaborative catchment 	<ul style="list-style-type: none"> 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 	Support	Support	Support
Forest and Bird NZ	98	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.	Support	There are limits to supplementary allocation, F&G's submission and the RPS should mention this limit	Amend based on
Fonterra Co-operative Group Limited	99	Amend	Retain Policy 4.4.1 subject to an additional clause to read: "e) <u>Recognising and providing for the continued operation and</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	Oppose	Oppose. Chapter 4 covers economic use	Retain as notified
Waitaki Irrigators Collective Limited	113	Amend	Amend b) and c) as follows: "b) <u>where appropriate, give preference to</u> the development or upgrade of infrastructure ... c) <u>Encouraging collective coordination and collaborative catchment management processes</u> 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..."	<ul style="list-style-type: none"> 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". 	Support in part	Oppose the introduction of collaborative catchment management processes if they are a) binding on their participants, and b) if they impose significant time costs and resource requirements on volunteers and small organisations	Retain as notified unless a better definition of collaborative processes can be determined
Federated Farmers of New Zealand	115	Amend	Amend as follows (or words to similar effect): "Ensure an efficient allocation and use of water by: a) <u>Requiring that the volume of water allocated</u>	<ul style="list-style-type: none"> Clause a) has potential to be interpreted tightly and should be rewritten to allow for reasonable seasonal variation in use, and/or allow for 	Support	Support	Support
			b) <u>Requiring the development or upgrade of</u>				
Director-General of	117	Support	Retain as notified.	<ul style="list-style-type: none"> Supported as an important mechanism for 			
Otago and Central	118	Support	Support.	No reason given.			
Otago Water Resource Users Group	121	Amend	<ul style="list-style-type: none"> Amend b) as follows: "b) <u>Requiring Encouraging the development or upgrade</u> 	<ul style="list-style-type: none"> Clause b) as currently written is too prescriptive and too absolute for a regional policy statement. 			

Horticulture New	124	Amend	Retain Policy 4.4.1 but clarify in what	Efficient allocation and use of water is essential.	Support	Support	Support
Environmental Defence Society	127	Amend	Amend Policy 4.4.1 to specify that the courses of action identified as necessary to achieve efficient	• The efficient allocation and use of water is supported (Objective B4 NPSMF).	Support	Support	Support
Oceana Gold (New	140	Amend	Add:	Not all uses of water are of equal value; e.g. ore	Oppose	Oppose	Oppose
Peter and Margaret Hore	146	Amend	Amend (b) by replacing "requiring" with "give preference to..."	While it is often desirable to require infrastructure that increases efficiency, the wider	Support	Support	Support
Peter and Margaret Hore	146	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.	Support in part	Oppose the introduction of collaborative catchment management processes if they are a) binding on their participants, and b) if they impose significant time costs and resource requirements on volunteers and small organisations	Retain as notified unless a better definition of collaborative processes can be determined
Peter and Margaret Hore	146	Amend	Provide clarity within the RPS as to how competing values and uses should be evaluated and weighed	Paragraph (d) may be at odds with other policies in the proposed RPS - e.g. Policy 2.1.1(h) and	Support	Support	Support
Landpro Limited	150	Did not	Support 4.4.1(c) and (d), but opposes the stringent	The Section 32 report acknowledges that a strong	Support	Support	Support
Straterra	151	Amend	Support subject to the following amendments (to list item c): "c) Encouraging collective coordination and rationing of take and use of	• The wording in this policy is detailed, while containing omissions. • The question is what value this policy adds to	Oppose	Oppose	Oppose
Te Runanga o Moeraki, Kati Huirana	154	Amend	• Cross-reference this policy to policies relating to freshwater values and management.	No reason given.	Support	Support	Support
Otago Conservation Board	155	Amend	[Explicitly express] that the [PRPS] is not creating a hierarchy of rights, but instead acts as a levelling	No reason given.	Support	Support	Support
Dunedin City Council	156	Amend	• Amend (b) as follows:	• Submitter manages collection, supply,	Support	Support	Support
165 Policy 4.4.3 - Encouraging environmental enhancement							
Jasmine Hunter	4	Did not	Encourage farmers and other landowners to	• Weeds multiply and spread to neighbouring	Support	Support	Support
Clutha District Council	28	Support	Support and potentially strengthen to offer incentives where enhancement is undertaken	• The Council has a contestable biodiversity fund in place that partially achieves this policy.			
Otago Peninsula	40	Support	Strongly support this policy.	Many of the clauses and sub-policies reinforce	Support	Support	Support
Central Otago Wilding	49	Support	Support.	Strongly support.	Support	Support	Support
Guardians of Lake	73	Amend	Clarify why items a) through to i) are all followed	It is not obvious why the items a) through to i)	Support	Support	Support
Matthew Sole	75	Amend	• Retain and amend to read "Encourage, facilitate and support activities that..." • Use "and/or" instead of "or".	Projects may do more than one thing, hence suggested "and / or".	Support	Support	Support
Darby Planning LP	81	Support	Retain Policy 4.4.3	Support the intent of Policy 4.4.3 which	Support	Support	Support

Forest and Bird NZ	98	Support	Retain.	No reason given.	Support	Support	Support
Director-General of Conservation	117	Amend	Amend as follows: "Encourage activities which contribute to enhancing the natural environment, including to:	An amendment to this policy is recognised to be consistent with Policy 21 of the NZCPS. The policy should encourage the enhancement of water	Support	Support	Support
Environmental Defence Society	127	Amend	Clarify that enhancement is encouraged when the base level water quality is within the allocated limit	• Enhancement of the natural environment is supported. However, in many of the listed	Support	Support	Support
Upper Clutha	144	Amend	Remove the word "or" from the end of each item	No reason given.	Support	Support	Support
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki,	154	Amend	Reword as follows: "Encourage activities which contribute to enhancing the natural environment, including to:	No reason given.	Support	Support	Support
Otago Conservation Board	155	Did not specify	[Policy illustrates] where and how a closer working relationship between the Board and the ORC could	A sustained, encouraging dialogue with all environmental stakeholders and actors could be	Support	Support	Support
168 Policy 4.5.1 - Avoiding objectionable discharges							
Alliance Group Limited	56	Oppose	Delete this policy or amend it as follows: " Avoiding Managing objectionable discharges Avoid , remedy or mitigate discharges that are objectionable or offensive to takata whenua and	• 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	Oppose	Oppose	Retain as notified
OSPRI	68	Oppose	Delete 4.5.1(b)	• Many discharges are potentially offensive to Takata Whenua and the wider public, (b) - (c) are possible inclusions , not exhaustive lists.	Oppose	Oppose	Retain as notified
NZ Pork Industry Board	83	Amend	Add to point c): " <u>in inappropriate locations</u> ".	• In rural environments some odour is to be expected that may be considered objectionable	Oppose	Oppose	Retain as notified
Fonterra Co-operative Group Limited	99	Amend	• 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 key parts of policy framework that will, at least in part, address the core aspects the concerns raised: • In relation to water: "Policy (v) Manage the adverse effects of discharge activity	• 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 with the discharge or the discharging	Oppose	Oppose	Retain as notified
The Fertiliser Association of New Zealand Inc.	110	Amend	Amend as follows: "Policy 4.5.1 Avoiding objectionable discharges Avoid, remedy or mitigate discharges that are objectionable or offensive to takata whenua and the wider community, including: a. Discharges of human or animal waste: i. Directly to waterbodies; or ii. In close proximity to waterbodies; or	• Supports the intent of the Policy. • Some of the terms used are ambiguous and could be interpreted in a number of ways. • 'close proximity' is a vague term. • The Policy should refer to 'waterbodies' rather than generically refer to 'water'. • The Policy should be amended to provide for the avoidance, remediation and mitigation of	Oppose	Oppose	Retain as notified
Federated Farmers of New Zealand	115	Oppose	Delete Policy 4.5.1, or amend to focus solely on hazardous substances.	• Submitter supports the intent to avoid discharges that are objectionable or offensive to takata whenua and the wider community. • In practice there are practical limitations	Oppose	Oppose	Retain as notified

Director-General of Conservation	117	Support	Retain as notified.	As written the Policy is consistent with Policy 23(2) of the NZCPS 2010	Support	Support	Retain as notified
Otago Water Resource Users Group	121	Amend	Amend as follows: "Avoid discharges that are objectionable or offensive to ta	• The issue of objectionable discharges was recently addressed by the Regional Plan: Water, Plan Change 6A. It is not appropriate to now	Support	Support	Retain as notified
Horticulture New Zealand	124	Amend	Amend Policy 4.5.1 " Objectionable adverse effects from	• The policy should be consistent with the RMA and seek that adverse effects are avoided	Oppose	Oppose	Retain as notified
Environmental Defence Society Incorporated	127	Amend	Amend as follows: • Provide for the control of animal waste discharges in order to effect to freshwater	• The avoidance of objectionable discharges is strongly supported in principle. • Discharges of animal waste are inevitable. The	Support	Support	Retain as notified
Z Energy Limited, BP Oil NZ Limited and Mobil Oil NZ Limited	128	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 , noxious or dangerous, having regard to the sensitivity of th	• The avoidance of discharges that are offensive or objectionable is supported. • The criteria for assessing this should be clearly established and measurable. • 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.	Oppose	Oppose	Retain as notified
Oceana Gold (New Zealand) Limited	140	Amend	Amend to make provision for instances where objectionable discharges can be mitigated.	Use of the term "avoid" is prescriptive and could lead to some activities being precluded which are	Oppose	Oppose	Retain as notified
Ballance Agri-Nutrients Limited	141	Amend	Amend as follows: "AvoidMinimise discharges that are objectionable or offensive to takata whenua and the wider com	• The requirement for outright avoidance of the discharges is inappropriate. A more appropriate direction would be the 'minimisation' of objectionable and offensive discharges. This	Oppose	Oppose	Retain as notified
Ravensdown Works Limited	143	Oppose	• Reword to read "Where practicable avoid discharges that are objectionable or offensive	• This Policy is worded as if all odorous or conspicuous discharges are objectionable or	Oppose	Oppose	Retain as notified
Remarkables Park	147	Support	Support Policy 4.5.1 and recognise its linkage to	District councils should manage infrastructure to	Support	Support	Retain as notified
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Amend	• 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:	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.	Support	Support	Make changes as requested by Ngai Tahu.
Dunedin City Council	156	Amend	Delete Policy 4.5.1.	• 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. • Addressing how this policy would be given effect under Method 3 Regional Plans will also	Oppose	Oppose. The regional plan: water already takes this approach	Retain as notified
171 Policy 4.5.4 - Minimising soil erosion							
Clutha District Council	28	Support	Support and potentially strengthen to include soil degradation and loss from intensive stocking	• Council is aware of intensive grazing practices that lead to soil degradation and ultimately soils	Support	Support	Support
Federated Farmers of	115	Support	Adopt Policy 4.5.4 as proposed.	• It is appropriate to minimise soil erosion where	Support	Support	Support

172 Policy 4.5.5 - Controlling the introduction and spread of pest plants and animals

Clutha District Council	28	Support	No change.	The Council supports the intent of this policy and	Support	Support	Support
Otago Peninsula Biodiversity Group	40	Amend	<ul style="list-style-type: none"> Strongly support this policy. Insert an additional sub-policy requiring specific 	<ul style="list-style-type: none"> This policy is fundamental to the aims and activities of the OPRG. 	Support	Support	Support
Central Otago Wilding	49	Support	Support this policy.	No reason given.	Support	Support	Support
Yellow-eyed Penguin Trust	63	Support	Support policy. That it drives a change to Water Plan Rule 12.9.1.2 relating to the use of pesticides in	<ul style="list-style-type: none"> This is an important policy: pest species may place additional and often unsustainable pressures on vulnerable coastal species, such as 	Support	Support	Support
Guardians of Lake	73	Amend	Clarify why items listed are all followed by "or".	It is not obvious why the items a) through to i)	Support	Support	Support
Matthew Sole	75	Amend	<ul style="list-style-type: none"> Amend to read: "Preventing the introduction and spread of pest plants and 	No reason given.	Support	Support	Support
			animals Control the adverse effects of pest species, prevent their introduction and spread, to safeguard: "				
Darby Planning LP	81	Support	Retain Policy 4.5.5.	Support the intent of Policy 4.5.5 relating to the control of pest species.	Support	Support	Support
Forest and Bird NZ	98	Amend	<ul style="list-style-type: none"> Amend to read: "Preventing the introduction and spread of pest plants and animals" 	No reason given			
W.G. Nagle	111	Amend	Amend.	<ul style="list-style-type: none"> 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. 	Support in part	Fish and Game has sought a clear definition of pest and predator based on the Biosecurity Act definition in its initial submission	Retain as notified including Fish and Game's initial submissions on this point
Federated Farmers of	115	Support	Adopt Policy 4.5.5 as proposed.	<ul style="list-style-type: none"> Pest species can significantly impact the 	Support	Support	Support
Director-General of Conservation	117	Amend	Amend as follows: "Control the adverse effects of pest species,	<ul style="list-style-type: none"> it should be recognised that water quantity as well as water quality can be impacted by the 	Support	Support	Support
Horticulture New Zealand	124	Amend	<ul style="list-style-type: none"> Amend as follows: "Control 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 to safeguard: ... h) primary production activities" Any consequential amendments are sought as 	<ul style="list-style-type: none"> 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. Biosecurity and prevention of introduction of unwanted organisms that are a threat to horticultural crops is a key issue for growers. 	Support	Support	Support
Horticulture New Zealand	124	Amend	<ul style="list-style-type: none"> Amend as follows: "Control 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 to safeguard: ..." Add a new point: 	<ul style="list-style-type: none"> 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. Biosecurity and prevention of introduction of unwanted organisms that are a threat to 	Support	Support	Support

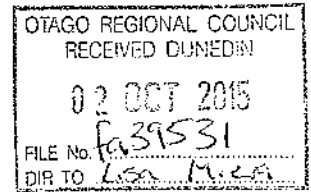
Remarkables Park Limited and	147	Amend	<ul style="list-style-type: none"> Review provisions for pest management, and ensure that 	<ul style="list-style-type: none"> The management of pest species is supported, but reference to district plans as a 	Support	Support	Support
Queenstown Park Limited			<ul style="list-style-type: none"> methods relate correctly to policies. Ensure that the provisions are within the 	<ul style="list-style-type: none"> method is queried. Policy refers to Method 4 City and District Plans, 			
John Wilson Douglas	94	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.	Support	Support	Support WCO's as a method to protect outstanding rivers
Fonterra Co-operative Group Limited	99	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"> Part C does not recognise that the PRPS is also required to be addressed by applicants for resource consent. The PRPS leaves a significant number of matters "open-ended". Pending the completion of District Plan and Regional Plan processes, these matters 	Oppose	District Plans and Regional Plans are complete. The RPS changes add little uncertainty	Retain as notified
2.30 AER 2.2 - Otago's water bodies support healthy ecosystems, are safe for swimming and maintain their natural form and character							
Phil Murray	42	Amend	Include as an indicator: "Otago rivers are safe for swimming".	<ul style="list-style-type: none"> People's ability to safely swim in rivers is one of the most readily understood and appreciated 	Support	Support	Support
Lynne Stewart	47	Amend	Include as an indicator: "Otago rivers are safe for human use, safe for swimming".	<ul style="list-style-type: none"> People's ability to safely swim in rivers is one of the most readily understood and appreciated water quality indicator. 	Support	Support	Support
Guardians of Lake	73	Amend	Amend.	<ul style="list-style-type: none"> None of the indicator descriptions are likely to 	Support	Support	Support
Name	Number	Position	Decision Requested	Reason for Decision Requested			
				criteria.			
Contact Energy Limited	74	Amend	Amend AER 2.2 to read as follows: "Otago's water bodies generally support healthy ecosystems, are	<ul style="list-style-type: none"> Not all Otago's waterways are "outstanding" for their natural values or unmodified. 	Support	Support	Support
The Fertiliser	110	Support	Retain as notified.	No reason given.	Support	Support	Support
W.G. Nagle	111	Amend	Add "biological, chemical and physical" to "Regular	No reason given	Support	Support	Support
Waitaki Irrigators Collective Limited	113	Amend	Amend the indicator in relation to wetlands to include a significance threshold.	<ul style="list-style-type: none"> 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. 	Oppose	The health of wetlands can be determined with simple visual methods as well	Retain as notified
Otago and Central South Island Fish and	118	Amend	Amend the measure associated to the 4th indicator as follows:	<ul style="list-style-type: none"> As written this AER does not anticipate any monitoring of wetlands, does not specify what 	Support	Support	Support
Horticulture New Zealand	124	Amend	Amend as follows: "Otago's water bodies support healthy ecosystems,	<ul style="list-style-type: none"> The NPSFM does not require that all water bodies are at a swimming contact recreation 	Support	Support	Support

Oceana Gold (New Zealand) Limited	140	Amend	Retain but make it clear that some activities, like mining, are locationally constrained and may degrade wetlands and in these instances, adverse	• 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	Support	Support	Support
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou	154	Amend	• Change title of AER 2.2 to read: "Otago's water bodies support healthy ecosystems, are safe for mahinga kai gathering swimming, and maintain their natural form and ch	in areas of importance to Kai Tahu, water quality should be of a mahinga kai gathering standard (not just a swimming standard).	Support	Support	Support
231 AER 2.3. The quality of Otago's coastal environment is maintained or enhanced							
Name	Number	Position	Decision Requested	Reason for Decision Requested			
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Amend	Add indicators as follows: • 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. • The quality of coastal water in areas valued by	Indicators as currently drafted do not: • measure protection of Kai Tahu values, rights and interests in relation to the coast. • only measure water quality for swimming (not mahika kai or ecological health). • measure protection of natural, cultural,	Support	Support	Support
232 AER 2.4. The quality of Otago's soils is maintained or enhanced							
Name	Number	Position	Decision Requested	Reason for Decision Requested			

1042

Lisa Miers

From: David Campbell <david.campbell@Cluthadc.govt.nz>
Sent: Friday, 2 October 2015 11:40 a.m.
To: RPS ORC
Subject: RPS FS from Clutha DC
Attachments: PRPS Submission Document.docx



Hi,
Please find attached our further submission, which is by no means complete, but most the way there and covers the key areas.
Will get it out to the other submitters next week.
Regards,
David

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Provision	Submitter	SUB #	Decision Requested	CDC Position	Reasoning
<p>269: Introduction to objective 2.1</p> <p>The values of Otago's natural and physical resources are recognised, maintained and enhanced</p> <p><i>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 the values attached to our resources, and identifies those which need protection.</i></p>	Otago Peninsula Biodiversity group	40	Amend – <u>'both direct and indirect consequences'</u>	Support	
	Matthew Sole	75	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.	Support	
	Forest and Bird NZ	98	Amend – 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.	Support	
	Fonterra Co-operative group	99	Amend the explanatory text to 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, 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 <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.</u> <u>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>	Neutral	
Director-General of Conservation	117	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	Support		

			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 in part from indirect consequences of land use, such as the introduction and spread of pest species. ..."</u>		
	Landscape Connections Trust	123	Amend - 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. Review related policies to ensure this is consistent throughout the Chapter.	Neutral	
	Oceana Gold (New Zealand) Limited	140	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. A <u>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> "	Neutral	
	Straterra	151	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, <u>at places need merit particular attention when considering use and development and to provide for protection in some circumstances, where appropriate.</u> "	Neutral	
35: Policy 2.1.5 – Managing for Soil Values	Agrissentials Mosgiel	15	Did not specify – The ORC needs to introduce measures to protect this treasure (soil). And, the RPS should be moving away from the 'chemical age'.	Oppose	
Recognise soil values, and manage	Egg Producers	29	Amend – Replace "soil" by "land" throughout the Policy.	Oppose	

soils, to: a) Maintain their life supporting capacity; and b) Maintain soil biodiversity; and c) Maintain biological activity in soils; and d) Maintain soil's function in the storage and cycling of water, nutrients, and other elements through the biosphere; and e) Maintain soil's function as a buffer or filter for pollutants resulting from human activities, including aquifers at risk of leachate contamination; and f) Retain soil resources for primary production; and g) Protect Kāi Tahu values; and h) Provide for other cultural values; and i) Maintain the soil mantle where it acts as a repository of heritage objects; and j) Maintain highly valued soil resources; and k) Avoid contamination of soil; and l) Avoid the adverse effects of pest species, prevent their introduction and reduce their spread	Federation of New Zealand				
	Alliance Group Limited	56	Amend – Amend the policy as follows: "Recognise soil values, and manage soils, to: ... g) Protect Provide for Kai Tahu values; and ... h) Provide for other cultural values, 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> "	Neutral	
	PowerNet Limited	60			
	HW Richardson Group Limited	61			
	Trustpower Limited	85			
	Matthew Sole	75	Amend – Rewrite to manage soil impacts from intensive soil use. Amend b) to read: "b) maintain soil diversity and restore where it has been degraded." Add "k) protect significant undeveloped soils from disturbance"	Oppose	
	NZ Pork Industry Board	83	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.	Oppose	
	McKeague Consultancy Limited	89	Amend – Remove the word "avoid" and replace with "avoid or minimise" or "minimise" [in Policy 2.1.5 (k) and (l)].	Oppose	
	Jolyon Manning JP	93	Did not specify – The ORC should have a stand-alone quality soil monitor policy as a follow up of the earlier 'Grow Otago' project.	Support	
	Fonterra Co-operative	99	Amend – Delete clauses h), i) and k), Amend g) to read: "g) Protect Kai Tahu and <u>other cultural values</u> ; and".	Oppose	
Royalburn Farming Company Limited	102	Amend as follows: "Recognise soil values <u>that are of a regional significance</u> , and manage <u>those soils</u> , to: ... f) <u>Retain</u> 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	Neutral		
Walter Peak Station Limited	103				

	<p>Milbrook Country Club 104</p> <p>Eastburn Farm 105</p> <p>RCL Queenstown PTY Ltd 106</p> <p>Damper Bay Estates Ltd 107</p> <p>Halfway Bay Station 108</p> <p>Water Tight Investments 109</p>	<p>104</p> <p>105</p> <p>106</p> <p>107</p> <p>108</p> <p>109</p>	<p>h) Provide for other cultural values, <u>as identified in Schedule 1A; and ...</u></p> <p>k) <u>Avoid contamination of soil from inappropriate subdivision, use and development; and...</u>"</p>		
	<p>The Fertiliser Association of New Zealand</p>	<p>110</p>	<p>Amend – Amend as follows:</p> <p>"Recognise soil values, and manage <u>the effects of activities which impact on soils, to: ...</u></p> <p>e) <u>Maintain soil's function as a buffer or filter for pollutants contaminants resulting from human activities and natural events, including for the protection of aquifers at risk; aquifers at risk of leachate contamination; and</u></p> <p>f) <u>Retain soil resources for primary production; and</u></p> <p>g) <u>Protect protected customary rights and avoid, remedy or mitigate adverse effects on Kai Tahu values; and ...</u></p> <p>k) <u>Avoid Ensure that the accumulation of contamination of contaminants in soils is managed and does not cause a reduction in the range of existing and foreseeable uses of the soil resource ; and ..."</u></p>	<p>Support</p>	
	<p>W. G. Nagle</p>	<p>111</p>	<p>Amend – 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.</p> <p>Policy 2.1.5 l) - Use of the term 'pest' has strict and inadequate connotations.</p>	<p>Neutral</p>	

Wise Response Society Inc.	114	Amend as follows: "Policy 2.1.5 <u>Managing soil for ecosystem function and value</u> Managing for soil values Recognise soil values, and manage soils, to: a) <u>Sustain and enhance</u> maintain their life supporting capacity biological activity soil biodiversity; and b) Maintain soil biodiversity; and e) Maintain biological activity in soils; and d) <u>b) Sustain and enhance</u> maintain soil's functions in the storage and cycling of water, nutrients, and other elements through the biosphere; and e) <u>c) Sustain and enhance</u> Maintain soil's function as a buffer or filter for pollutants resulting from human activities, including aquifers at risk of leachate contamination; and f) <u>d) Actively promote soil conservation</u> Retain soil resources for primary production; and... "	Neutral	
Federated Farmers of New Zealand	115	Amend – Delete proposed Poly 2.1.5.f)	Oppose	
AgResearch Ltd.	116	Amend – Retain clauses (f) and (j). Delete clause (h)	Oppose	
Otago and Central South Island Fish and Game Councils	118	Amend – Add the following clause: "m) Avoid human or animal-induced sediment runoff."	Oppose	M) is already covered through a), d), f)
Horticulture New Zealand	124	Amend – Policy 2.1.5 as follows: " <u>Identify and</u> recognise soil values and manage land to: ..." Include an additional point: " <u>Provide for food production values.</u> " Retain – Maintain highly values soil resources.	Support	
Clutha Agricultural Development Board	126	Amend Policy 2.1.5 as follows: "Recognise soil values, and manage soils, to: ... b) <u>Maintain and enhance</u> soil biodiversity; and c) <u>Maintain and enhance</u> biological activity in soils; and ... j) To <u>maintain and retain</u> highly valued soil resources); and ..." Add policy similar to 2.1.1(o) in relation to the Land Use	Support	

			Capability class land subject to erosion LYC class 1-4, e.g. "Mitigate the adverse effects of natural hazards, including erosion (or more specific soil erosion)".		
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	Royalburn Farming Company Limited	102	<p>Amend – "Recognise soil values that are of a regional significance , and manage those soils, to:</p> <p>...</p> <p>f) <u>Retain Ensure the primary use of regionally significant soil resources is for primary production purposes ; and</u></p> <p>g) <u>Protect Kai Tahu values from inappropriate subdivision, use and development ; and</u></p> <p>h) <u>Provide for other cultural values , as identified in Schedule 1A ; and ...</u></p> <p>k) <u>Avoid contamination of soil from inappropriate subdivision, use and development ; and ..."</u></p>	Support	Agree with the inclusion of schedule 1A
	Walter Peak Station Limited	103			
	Milbrook Country Club	104			
	Eastburn Farm	105			
	RCL Queenstown PTY Ltd	106			
	Damper Bay Estates Ltd	107			
	Halfway Bay Station	108			
	Water Tight Investments	109			
	Soho Basin Skifield Limited	129			
	Northlake Investments Limited	130			
	Shotover Country Limited	131			
	Ayrburn Farm Developments Limited	132			
	Bridesdale Farm	133			

	Developments Limited				
	Glencoe Station Limited	134			
	Treble Cone Investments Limited	135			
	Woodlot Properties Limited	136			
	Henley Downs Farm Holdings Limited	137			
	Real Journeys	138			

	Oceana Gold Limited	140	Amend – to clarify if there is a ranking or if it is acceptable to comply with one factor but not another. Delete (k), or in the very least amended to say: "k) Avoid, <u>remedy or mitigate any potential</u> contamination of soil;" 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	Oppose	
	Ravensdown Works Limited	143	Amend – (k) as follows " <u>Where possible</u> avoid contamination of soil <u>that would result in contaminated land</u> and"	Oppose	Wording requested not clear
	Peter and Margaret Hore	146	Amend – Remove the word "avoid" and replace with "minimise" [in Policy 2.1.5 (k) and (l)].	Oppose	
	Remarkables Park Limited and Queenstown Park Limited	147	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. 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. 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. Clarify the difference between high quality soils and highly versatile soils.	Neutral	
	Straterra	151	Amend – Support subject to the following amendments [as follows]: "...g) <u>Provide for the use, development and pProtection of Kai Tahu</u> values; and ... k) Avoid, <u>remedy or mitigate</u> contamination of soil; and l) Avoid, <u>remedy or mitigate</u> the adverse effects of pest species, prevent their introduction and reduce their spread; and ..."	Oppose	
	Te Runanga o	154	Amend policy as follows:	Neutral	

	Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga		"g) Protect Kai Tahu values, <u>rights, interests and objectives</u> ;" Add further policies to: Avoid and remedy significant induced: <ul style="list-style-type: none"> • soil erosion • nutrient loss • sediment loss (particularly where it results in siltation of water bodies). • Cross reference to Policy 2.2.14. • Cross reference siltation issues to freshwater and coastal policies 		
	Dunedin City Council	156	Amend – Reword (i) to reflect requirements of Heritage NZ Pouhere Taonga Act 2014 which require an archaeological authority where archaeological sites may be disturbed. Amend (k) as follows " <u>Avoid Minimise the adverse effects of existing contamination of soil</u> ; and <u>Avoid, where practicable, significant new soil contamination occurring.</u> " Clearly identify in the methods how each of the provisions in this policy will be given effect to, including through Regional Plans	Support	
37: Policy 2.1.7 – Recognising the values of natural features, landscapes and seascapes. Recognise the values of natural features, landscapes, seascapes and the coastal environment are derived from the following attributes, as detailed in Schedule 4: a) Biophysical attributes, including: i. Natural science factors; ii. The presence of water; iii. Vegetation (indigenous and	Central Otago District Council	37	Explain how the attributes have been determined and align with Schedule 4.	Support	
	Darby Planning LP Meridian Energy	81 82	Amend – Amend policy 2.1.7 as follows: "Recognise the values of natural features, landscapes, <u>and seascapes and the coastal environment</u> are derived from the following attributes, as detailed in Schedule 4 : a) Biophysical attributes, including: i. Natural science factors, <u>including biotic and abiotic factors</u> ; ii. The presence of water <u>Legibility and expressiveness</u> ; iii. Vegetation (indigenous and introduced) ; iv. The natural darkness of the night sky ; b) Sensory attributes, including: i. Legibility or expressiveness	Oppose	

<p>introduced);</p> <p>iv. The natural darkness of the night sky;</p> <p>b) Sensory attributes, including:</p> <p>i. Legibility or expressiveness;</p> <p>ii. Aesthetic values;</p> <p>iii. Transient values, including nature's sounds;</p> <p>iv. Wild or scenic values;</p> <p>c) Associative attributes, including:</p> <p>i. Whether the values are shared and recognised;</p> <p>ii. Cultural and spiritual values for Kāi Tahu;</p> <p>iii. Historical and heritage associations.</p>			..."		
	Fonterra Co-operative Limited	99	Delate Policy 2.1.7	Oppose	
	Soho Basin Skifield Limited	129	Amend c) iii. as follows: "iii. Historical and heritage associations".	Neutral	
	Northlake Investments Limited	130			
	Shotover Country Limited	131			
	Ayrburn Farm Developments Limited	132			
	Bridesdale Farm Developments Limited	133			
	Glencoe Station Limited	134			
	Treble Cone Investments Limited	135			
	Woodlot Properties Limited	136			
Henley Downs Farm Holdings Limited	137				
Real Journeys	138				
Environmental Defence Society	127	Oppose – Delete Policy	Oppose		

	Incorporated				
	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Amend – Provide policy guidance and methods for how the values of natural features, landscapes and seascapes will be "recognised". 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).	Support	
38: Schedule 4 – criteria for the identification of natural features and landscapes. The identification of natural features and landscapes will be based on, but not limited to, the following factors: 1. Biophysical attributes a) Natural science factors, including geological, topographical, ecological and dynamic components b) The presence of water including in seas, lakes, rivers and streams c) Vegetation (native and exotic) 2. Sensory attributes a) Legibility or expressiveness—how obviously the feature or landscape demonstrates its formative processes b) Aesthetic values including memorability and naturalness c) Transient values including presence of wildlife or other values at certain times of the day or year d) Wild or scenic values	Contact Energy Limited	74	Amend – Amend Schedule 4 heading to read as follows: "Criteria for the identification of <u>outstanding/highly valued</u> natural features and landscapes." Amend Schedule 4 introductory description to read as follows: "The identification of <u>outstanding</u> natural features, <u>and</u> landscapes <u>and</u> seascapes (Policy 2.2.3) and <u>special amenity landscapes and highly valued natural features</u> (Policy 2.2.5) will be based on but not limited to <u>an assessment of</u> the following factors:"	Support	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
	Darby Planning LP	81	Oppose – Delete Schedule 4 criteria for the identification of natural features and landscapes	Oppose	
	Meridian Energy Limited	82	Amend Schedule 4 to reflect the amendments sought to Policy 2.1.7	Oppose	
	John Wilson Douglas	94	Amend – Add: "e) distinctive seasonal changes" under 2 (Sensory attributes).	Oppose	
	Fonterra Co-operative Group Limited	99	Amend – 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. 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). Include express reference to outstanding landscapes being in the context of section 6 of the Act (and not more	Support	

<p>3. Associative attributes</p> <p>a) Whether the values are shared and recognised</p> <p>b) Cultural and spiritual values for takata whenua, identified by working, as far as practicable, in accordance with tikanga Māori; including their expression as cultural landscapes and features</p> <p>c) Historical and heritage associations</p>			generally).		
	Soho Basin Skifield Limited	129	Oppose – Delete Schedule	Oppose	
	Northlake Investments Limited	130			
	Shotover Country Limited	131			
	Ayrburn Farm Developments Limited	132			
	Bridesdale Farm Developments Limited	133			
	Glencoe Station Limited	134			
	Trebie Cone investments Limited	135			
	Woodlot Properties Limited	136			
	Henley Downs Farm Holdings Limited	137			
Real Journeys	138				
Oceana Gold (New Zealand) Limited	140	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.	Neutral		
Remarkables Park	147	Provide clarification as to the purpose of Schedule 4, and	Neutral		

	Limited and Queenstown Park Limited		how it will be used.		
	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Amend – Biophysical attributes]: In b) include <u>wetlands</u> [Associative attributes]: In b) correct spelling to <u>tikaka</u> [Maori]. Reference the importance of Kai Tahu association with rivers, lakes and their margins. Add wetlands and hapua to 1(b)	Support	
39: Policy 2.1.8 – Recognising the values of natural character of the coastal environment	Fonterra Co-operative Limited	99	Oppose – Delete Policy 2.1.8	Oppose	
Recognise the values of natural character in the coastal environment are derived from the following attributes: a) Natural elements, processes and patterns; b) Biophysical, ecological, geological and geomorphological aspects; c) Natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, estuaries, reefs, freshwater springs and surf breaks; d) The natural movement of water and sediment; e) The natural darkness of the night sky; f) Places or areas that are wild or scenic; g) A range of natural character from pristine to modified; h) Experiential attributes, including the sounds and smell of the sea;	Wise Response Society Inc.	114	Amend – as follows: Policy 2.1.8 <u>Managing the value of the coastal environment, its conservation, sustainability of fisheries and natural character</u> Recognising the values of natural character in the coastal environment Recognise the values <u>of 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> <u>a) Sustainable, functioning estuarine and marine ecosystems that are sustainable</u> <u>b) Fish stocks that support a viable commercial fishery and valuable recreational fishery</u> <u>c) Natural elements, processes and patterns;</u> b)d) Biophysical, ecological, geological and geomorphological aspects; e)e) Natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, estuaries, reefs, freshwater springs and surf breaks; e)f) The natural movement of water and sediment; b)d) The natural darkness of the night sky; f)h) Pristine or highly natural <u>p</u> laces or areas that are	Oppose	Repetition of the NZCPS

and their context or setting.			wild or scenic and not spoilt by built structures or inappropriate activity ; g) A range of natural character from pristine to modified; h)i) Experiential attributes, including the sounds and smell of the sea; and their context or setting.		
	Environmental Defence Society Incorporated	127	Amend – Retain the identification criteria. Insert an identification methodology to complement the criteria. Relocate the criteria to a schedule and insert a cross reference to that schedule.	Support	
	Surfbreak Protection Society	139	Amend – Amend as follows: "Recognise, <u>map and identify</u> the values of natural character..."	Neutral	
	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Amend – Cross-reference to Policy 2.2.9 (Managing the natural character of the coastal environment)	Support	
40: Objective 2.2 – Otago's Significant and Highly Values Natural Resources 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 ensures they will be retained, while consumptive use of resources will be directed to areas where adverse effects are more acceptable.	Anderson & Co Resource Management	16	Amend – Make amendments to the Proposed RPS as required to carry out the provisions in other superior RMA documents.	Neutral	
	Alliance Group Limited	56	Amend – as follows: "Otago's significant and highly-valued natural resources are identified, and protected or enhanced <u>from inappropriate use or development</u> ."	Oppose	
	PowerNet Limited	60			
	HW Richardson Group Limited	61			
	Trustpower Limited	85			
	Queenstown Airport Corporation	122			
Aurora Energy Limited	76	Amend – Objective 2.2 as follows: "Otago's significant and highly-valued natural resources are identified, and	Oppose		

			protected <u>maintained</u> or where appropriate enhanced."		
	Forest and Bird NZ	98	Amend – "Otago's significant and highly valued natural resources, indigenous vegetation, habitats and indigenous biodiversity are consistently identified and protected."	Oppose	
	Wise Response Society Inc.	114	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. "	Oppose	
	Otago and Central South Island Fish and Game Councils	118	Amend as follows: "Objective 2.2 Otago's significant and highly valued natural resources are identified, and protected or enhanced <u>to maintain their distinctiveness and significance</u> "	Oppose	
	Horticulture New Zealand	124	Amend - as follows: "Otago's significant and highly values natural resources are identified, and <u>managed to maintain or enhance the resource</u> protected or enhanced. "	Oppose	
	Oceana Gold (New Zealand) Limited	140	Oppose – Delete	Oppose	
	Ravensdown Works Limited	143	Oppose - Insert after "enhanced" or "distinctiveness", "where appropriate".	Oppose	
	Angus Robertson	149	Amend - Amend Objective 2 and related policies to include protection of all surf breaks on the Otago Coastline.	Oppose	
	Straterra	151	Support subject to the following amendment: "Otago's significant and highly valued natural resources are identified, and protected <u>maintained</u> or enhanced."	Oppose	
	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Amend - Refer to Kai Tahu values in the Objective 2.2 description.	Neutral	

<p>44: Policy 2.2.2 – Managing Significant indigenous vegetation and significant habitats of indigenous fauna</p> <p>Protect and enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by:</p> <p>a) Avoiding adverse effects on those values which contribute to the area or habitat being significant; and</p> <p>b) Avoiding significant adverse effects on other values of the area or habitat; and</p> <p>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</p> <p>d) Remediating, when adverse effects cannot be avoided; and</p> <p>e) Mitigating where adverse effects cannot be avoided or remediated; and</p> <p>f) Encouraging enhancement of those areas and values.</p>	Central Otago District Council	37	Amend – Delete 2.2.2 c)	Oppose	Amend policy by replacing “managing” with “protecting”.
	Otago Peninsula Biodiversity Group	40	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.	Oppose	
	Alliance Group Limited	56	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 ..."	Oppose	
	PowerNet Limited	60			
	HW Richardson Group Limited	61			
	Trustpower Limited	85	Amend - d) <u>Remedying</u> or mitigating where adverse effects cannot be avoided or remediated ; and ..."	Oppose	
	PowerNet Limited	60			
	HW Richardson Group Limited	61			
	Trustpower Limited	85	Amend - Add an equivalent policy to directly recognise and protect rare and threatened indigenous species.	Oppose	
	Yellow-eyed Penguin trust	63			
Waitaki District Council	70	Amend - Amend to “Protecting significant indigenous vegetation and significant habitats of indigenous fauna”.	Oppose		
Contact Energy Limited	74	Amend - Add a further method to Policy 2.2.2 (new f) to protect and enhance values as follows: “ f) Offsetting where adverse effects cannot be avoided, remedied or mitigated and the activities causing those effects have a functional necessity to locate in the area of vegetation or habitat.”	Oppose	Already covered in other policies and objectives	
Matthew Sole	75	Amend - Amend a) to read: "a) Avoiding adverse effects	Oppose		

			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" Retain b) to e). Amend f) to read: "f) encouraging, facilitating and supporting enhancement..."		
Aurora Limited	Energy	76	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: ..."	Oppose	
Darby Limited	Planning		Amend Policy 2.2.2 as follows: "Protect and enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Assessing the significance of adverse effects in accordance with the criteria in Schedule 3; and b) <u>Avoiding significant adverse effects, and remedying, and mitigating all other</u> adverse effects on those values which contribute to the area or habitat being significant; and c) Avoiding significant adverse effects on other values of the area or habitat; and d) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and e) Remediating, when adverse effects cannot be avoided; and f) Mitigating where adverse effects cannot be avoided or remediated; and g) c) Encouraging enhancement of those areas and values."	Oppose	
Meridian Limited	Energy	82	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: a) <u>Assessing the significance of adverse effects in accordance with the criteria in Schedule 3; and</u>	Oppose	

			<p>a) b) Avoiding adverse effects on those values which contribute to the area or habitat being significant; and</p> <p>b) Avoiding significant adverse effects on other values of the area or habitat; and</p> <p>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</p> <p>d) Remediating, when adverse effects cannot be avoided; and</p> <p>e) Mitigating where adverse effects cannot be avoided or remediated; and</p> <p>c) <u>Offsetting or compensating residual effects on indigenous biodiversity, which cannot otherwise be avoided, remedied, or mitigated.</u></p> <p>f) <u>d)</u> Encouraging enhancement of those areas and values.</p>		
	New Zealand Petroleum and Minerals	86	Amend - Amend limbs a) and b) of policy 2.2.2 as follows: "a) <u>avoiding, remedying, or mitigating</u> adverse effects on those values which contribute to the area or habitat being significant; and b) <u>avoiding, remedying, or mitigating</u> significant adverse effects on other values of the area or habitat; and".	Oppose	Policy d) and e) cover this
	Transpower New Zealand Limited	97	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) <u>avoiding, or where this is not practicable, remedying or mitigating</u> adverse effects...; and b) Avoiding, remedying or mitigating other adverse effects on other values; and; ..."	Oppose	
	Forest and Bird NZ	98	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)."	Oppose	

			<p>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:..." "(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 ..." (b) - (f) retain. Add new policy: "Avoid the adverse effects of pest species, prevent their introduction and their spread." 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]."</p>		
Royalburn Farming Company Limited	102	Amend - as follows: " Protect and enhance <u>Manage subdivision, use and development that affects the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by:</u>	Oppose		
Walter Peak Station Limited	103	a) Avoiding adverse effects on those values which contribute <u>which will result in to the area or habitat losing its being significant status ; and</u>			
Milbrook Country Club	104	b) Avoiding significant adverse effects from inappropriate subdivision, use and development <u>on other values of the area or habitat; and</u>			
Eastburn Farm	105	c) Assessing the significance of adverse effects on these values, as detailed in Schedule 3, and ..."			
RCL Queenstown PTY Ltd	106				
Damper Bay Estates Ltd	107				

	Halfway Bay Station	108		
	Water Tight Investments	109		
	Soho Basin Skifield Limited	129		
	Northlake Investments Limited	130		
	Shotover Country Limited	131		
	Ayrburn Farm Developments Limited	132		
	Bridesdale Farm Developments Limited	133		
	Glencoe Station Limited	134		
	Treble Cone Investments Limited	135		
	Woodlot Properties Limited	136		
	Henley Downs Farm Holdings Limited	137		
	Real Journeys	138		

	W.G. Nagle	111	Amend - Restoration of degraded land must be part of the solution.		
	Wise Response Society Inc.	114	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 <u>Protect and enhance 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</u> of adverse effects on those values which contribute to the area or habitat being significant; and b) Prohibit <u>Avoiding</u> 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 <u>or have not been</u> avoided; and e) Mitigating where adverse effects cannot be <u>or have not been</u> avoided or remediated; and f) <u>Actively promoting and supporting</u> Encouraging enhancement of those areas and values."	Support in Part	We are supportive of using the word 'protect'
	Federated Famers of New Zealand	115	Amend - Replace clause a) with clause c) Delete clause b) Wording is amended as follows (or words to similar effect): "Protect <u>Manage</u> and enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) <u>Avoiding adverse effects on areas of significant indigenous vegetation and significant habitats of indigenous fauna</u> these values which contribute to the area or habitat being significant ; and	Oppose	

			<p>b) Avoiding significant adverse effects on other values of the area or habitat; and</p> <p>c) Assessing the significance of adverse effects on these values, as detailed in Schedule 3; and ..."</p>		
	Director General of Conservation	117	<p>Amend – as follows: Policy 2.2.2 Managing significant indigenous vegetation and significant habitats of indigenous fauna</p> <p>Amend as follows:</p> <p>"d) Remediating, when adverse effects <u>on other values</u> cannot be avoided; and</p> <p>e) Mitigating where adverse effects <u>on other values</u> cannot be avoided or remediated; and</p> <p>f) <u>Offsetting in accordance with Policy XX (New Policy XX Biodiversity Offsets – as detailed below) where adverse effects cannot be avoided, remedied or mitigated; and</u></p> <p>g) <u>Encouraging enhancement of those areas and values."</u></p>	Oppose	
	Queenstown Airport Corporation	122	<p>Amend - Amend the policy as follows: "Protect and where appropriate enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by:</p> <p>a) Avoiding where practicable adverse effects on those values which contribute to the area or habitat being significant; and</p> <p>b) Avoiding where practicable significant adverse effects on other values of the area or habitat; and</p> <p>...</p> <p>d) Remedying or mitigating where adverse effects cannot be avoided or remediated ; ...</p>	Oppose	
	Environmental Defence Society Incorporated	127	<p>Amend - Delete clauses (e) and (d).</p> <p>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</u></p>	Oppose	

			or mitigate other adverse effects."		
	Oceana Gold (New Zealand) Limited	140	Amend - Amend (a) to read: "a) avoiding, <u>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 <u>effects including significant adverse effects</u> cannot be avoided or remediated; (e) Mitigating where adverse <u>effects 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	Oppose	
	Pioneer Generation Limited	142	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: ..."	Support	
	Ravensdown Works Limited	143	Amend - Amend to read: " <u>Protecting</u> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna from the effects of inappropriate activities, by: a) Avoiding, <u>remedying, mitigating or offsetting</u> adverse effects adverse effects... b) Avoiding, <u>remedying, mitigating or offsetting</u> significant adverse effects..." Or amend paras (a) and (b) by inserting "Where practicable" ahead of "Avoiding".	Oppose	
	Straterra	151	Amend - Support subject to the following amendments: " Protect-Maintain and enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding, <u>remedying or mitigating</u> adverse effects on	Oppose	

			<p>those values which contribute to the area or habitat being significant; and</p> <p>b) Avoiding significant adverse effects on other values of the area or habitat; and</p> <p>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</p> <p>d) Remedying, when adverse effects cannot be avoided; and</p> <p>e) Mitigating where adverse effects cannot be avoided or remediated; and</p> <p>f) Encouraging enhancement of those areas and values.</p>		
	<p>Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga</p>	154	<p>Amend - Amend policy as follows: "Protect and enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna."</p> <p>Add further policies to:</p> <ul style="list-style-type: none"> - Protect areas, species and habitats of particular significance to Kai Tahu in a manner consistent with Kai Tahu values and principles. - Recognise Kai Tahu as kaitiaki. - Add a policy enabling Ngai Tahu cultural use of indigenous biodiversity according to tikaka. - 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. - Add priorities for protection, including areas identified by Kai Tahu as having significant cultural value. - Add a specific wetland protection and enhancement policy. - Provide policy guidance on use of biodiversity offsets. - Use of cultural monitoring tools developed by Kai Tahu. <p>Cross reference to new Policy under Objective 2.3 regarding integrated and coordinated approach to indigenous biodiversity management.</p>	Support in Part	

			Add Method 1— Kai Tahu relationships			
<p>46: Policy 2.2.4 – Managing Outstanding natural features, landscapes and seascapes</p> <p>Protect, enhance and restore the values of outstanding natural features, landscapes and seascapes, by:</p> <p>a) Avoiding adverse effects on those values which contribute to the significance of the natural feature, landscape or seascape; and</p> <p>b) Avoiding, remedying or mitigating other adverse effects on other values; and</p> <p>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</p> <p>d) Recognising and providing for positive contributions of existing introduced species to those values; and</p> <p>e) Controlling 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>	Central Otago District Council	37	Amend – Delete 2.2.4c)	Oppose	Amend – to policy by replacing ‘managing’ with ‘protecting’.	
	Alliance Group Limited	56	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"	Oppose		
	PowerNet Limited	60				
	HW Richardson Group Limited	61				
	Trustpower Limited	85				
	Queenstown Airport Corporation	122				
	Port Otago Limited	58	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.	Oppose		
	Waitaki District Council	70	Oppose - Amend to: "Protect, the values of outstanding natural features, landscapes and seascapes, by:..." Delete clause f).	Oppose		
Contact Energy Limited	74	Amend - Policy 2.2.4 a) to read as follows: "Avoid significant adverse effects on those values which contribute to the significance of make the natural feature, landscape or seascape outstanding." • Delete Policy 2.2.4 b).	Oppose			
Matthew Sole	75	Amend - Make the following amendments: a): "avoiding adverse effect on those attributes and qualities which ..." d): "[...] where those species do not have an actual or potential adverse effect on indigenous biodiversity, or landscape values in other areas." e): "preventing spread" instead of "reducing". Add "reducing presence". f): "encouraging, facilitating and supporting". Add: "h) encouraging facilitating and supporting	Oppose			

			mitigation of existing adverse effects to enhance outstanding natural character."		
Aurora Limited	Energy	76	Amend - Amend Policy 2.2.4 as follows: "Policy 2.2.4 Managing outstanding natural features, landscapes, and seascapes <u>Protect 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; and b. Avoiding, remedying or mitigating other adverse effects on other values; and ..."	Oppose	
Darby Planning LP		81	Amend - Amend Policy 2.2.4 as follows: "Protect, enhance and restore the values of outstanding natural features, landscapes and seascapes, by: <u>a) Assessing the significance of adverse effects in accordance with the criteria in Schedule 3; and</u> 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> c) Avoiding, remedying or mitigating other adverse effects on other those values <u>which contribute to the significance of the natural feature or landscape outside of the coastal environment; and</u> d) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and ..."	Oppose	
Meridian Limited	Energy	82	Amend- Amend Policy 2.2.4 as follows: "Protect <u>from inappropriate subdivision, use, and development</u> , and encourage <u>enhancement and restoration</u> of the values of outstanding natural features, landscapes and seascapes, by: <u>a) Assessing the significance of adverse effects in accordance with the criteria in Schedule 3; and</u> a) b) Avoiding adverse effects on those values which contribute to the significance of the natural feature,	Oppose	

			<p>landscape or seascape; and</p> <p>b) Avoiding, remedying or mitigating other adverse effects on other values; and</p> <p>e) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</p> <p>d) c) Recognising and providing for positive contributions of existing introduced species to those values; and</p> <p>e) d) Controlling the adverse effects of pest species, preventing their introduction and reducing their spread; and</p> <p>f) e) Encouraging enhancement of those areas and values.</p>		
	New Zealand Petroleum and Minerals	86	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".	Oppose	
	McKeague Consultancy Ltd	89	Amend - Replace "avoid" with "avoid and minimise" or "minimise" [in Policy 2.2.4 (a)]. Delete [Policy 2.2.4] (b).	Oppose	
	Transpower New Zealand Limited	97	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) Avoiding, remedying or mitigating other adverse effects on other values; and; ... "	Oppose	
	Fonterra Co-operative Group Limited	99	Amend - Amend as follows: "Policy 2.2.4 Managing outstanding natural features, landscapes, and <u>coastal environments</u> seascapes Protect, enhance and restore the values of outstanding natural features, landscapes and <u>coastal environments</u> (as anticipated by section 6 of the Resource Management Act 1991), seascapes by: a) Avoiding adverse effects on those values which contribute to the significance of the natural feature, landscape or <u>coastal environments</u> seascape; and ..."	Oppose	Coastal is already covered elsewhere in RPS
	Royalburn Farming	102	Amend - as follows: " Protect, enhance and restore	Oppose	

	Company Limited		Manage subdivision, use and development that affects the values of outstanding natural features, landscapes and seascapes, by:		
	Walter Peak Station Limited	103	a) Avoiding adverse effects on those values which contribute to which will result in the loss of the significance of the natural feature, landscape or seascape; and ...		
	Milbrook Country Club	104	c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and		
	Eastburn Farm	105	...		
	RCL Queenstown PTY Ltd	106	g) <u>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>		
	Damper Bay Estates Ltd	107	(h) <u>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>		
	Halfway Bay Station	108			
	Water Tight Investments	109			
	Soho Basin Skifield Limited	129			
	Northlake Investments Limited	130			
	Shotover Country Limited	131			
	Ayrburn Farm Developments Limited	132			
	Bridesdale Farm Developments	133			

	Limited				
	Glencoe Station Limited	134			
	Treble Cone Investments Limited	135			
	Woodlot Properties Limited	136			
	Henley Downs Farm Holdings Limited	137			
	Real Journeys	138			
	Wise Response Society Inc		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 <u>to a standard above sustainable resource management</u> the values of <u>significant and outstanding natural features, landscapes and seascapes</u> , by: a) <u>Avoiding 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) <u>Avoiding, remedying or mitigating other adverse effects on other values 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	Support in Part	Support the word 'protect'

			f) Encouraging enhancement of these areas and values."		
Federated Farmers of New Zealand	115	Amend - Replace clause a) with clause c) • Delete clause b) • 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) Avoiding, remedying or mitigating other adverse effects on other values; and c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and ..."	Oppose		
Director General of Conservation	117	Amend - Amend as follows: "a) Avoiding adverse <u>effects of subdivision, use and development on the characteristics and qualities of those values</u> which contribute to the significance of the natural features, landscapes or seascapes; and b) Avoiding <u>significant adverse effects</u> and avoiding, remedying or mitigating other adverse effects <u>of subdivision, use and development</u> on other values of natural features, landscapes and seascapes; ..."	Oppose		
Environmental Defence Society Incorporated	127	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.	Oppose		
Oceana Gold Limited	140	Amend - Amend (a) to read: "a) Avoiding, remedying or mitigating adverse effects..." Amend (b) similarly.	Oppose		

			Delete (d) and (e).		
	Ravensdown Works Limited	143	Amend para (a) by inserting "Where practicable" ahead of "Avoiding". Or amend para (a) by inserting "remedying or mitigating" after "Avoiding".	Oppose	
	Peter and Margaret Hore	146	Amend - Replace "avoid" with "minimise" [in Policy 2.2.4 (a)]. Delete [Policy 2.2.4] (b).	Oppose	
	Remarkables Park Limited and Queenstown Park Limited	147	Amend the policy to better reflect the Act and Policy 5.5.6 of the Operative RPS. 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. 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.	Oppose	
	Straterra	151	Amend - Support subject to the following amendments: "Protect-Maintain , enhance and restore the values of outstanding natural features, landscapes and seascapes, by: a) Avoiding, remedying or mitigating 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; and ... e) Avoiding, remedying or mitigating Controlling the adverse effects of pest species, preventing their introduction and reducing their spread; and f) Encouraging enhancement of those areas and values."	Oppose	
	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou	154	Amend - Add further policies to: "Protect, enhance and restore Ngai Tahu cultural landscapes." • Add Method 3 (Regional, City and District Relationships) • Add Method 6 (Research monitoring and reporting) • Cross reference to Policy 2.1.7 and 2.2.3	Neutral	

	and Hokonui Runanga				
	Dunedin City Council	156	Amend - Amend by removing (d) and (e). 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.	Neutral	
47: Policy 2.2.5 – Identifying Special Amenity Landscapes and Highly Valued natural Resources 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.	Central Otago District Council	37	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 environment, but which are not outstanding , using the attributes detailed in Schedule 4 ."	Oppose	
	Alliance Group Limited	56	Amend as follows: "Policy 2.2.5 Identifying special amenity landscapes and highly valued natural features <u>at a regional level</u> ."	Oppose	
	PowerNet Limited	60			
	HW Richardson Group Limited	61			
	Trustpower Limited	85			
	Queenstown Airport Corporation	122			
Waitaki District Council	70	Oppose - Delete Policy 2.2.5 and any other reference to special amenity landscapes and highly valued natural features are deleted.	Support		
Federated Farmers New Zealand	115				
Peter and Margaret Hore	146				
Transpower New Zealand Limited	97				
Contact Energy	74	Amend - Provide guidance as to how the attributes in	Support in		

	Limited		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.	Part	
	Matthew Sole	75	Reword policy header: "Identifying the attributes, qualities and features that give other landscapes and natural features amenity value".	Oppose	
	Blueskin Resilient Communities Trust	87	Delete Policy 2.2.5 and remove reference to special amenity landscapes and highly valued natural features.	Support	
	McKeague Consultancy Ltd	89	OR 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		
	Fonterra Co-operative Group Limited	99			
	Royalburn Farming Company Limited	102	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 ."	Oppose	
	Walter Peak Station Limited	103			
	Milbrook Country Club	104			
	Eastburn Farm	105			
	RCL Queenstown PTY Ltd	106			
	Damper Bay Estates Ltd	107			
	Halfway Bay Station	108			
	Water Tight	109			

	Investments				
	Soho Basin Skifield Limited	129			
	Northlake Investments Limited	130			
	Shotover Country Limited	131			
	Ayrburn Farm Developments Limited	132			
	Bridesdale Farm Developments Limited	133			
	Glencoe Station Limited	134			
	Treble Cone Investments Limited	135			
	Woodiot Properties Limited	136			
	Henley Downs Farm Holdings Limited	137			
	Real Journeys	138			
	Director- General of Conservation	117	Retain as notified	Oppose	
	Environmental	127			

	Defence Society Incorporated				
48: Policy 2.2.6 – Manging special amenity landscapes and highly valued natural features	Alliance Group Limited	56	Oppose – Delete Policy	Support	Oppose - Remove policy and associated reference in Method 4.2.2. Alternatively, if the policy is to be retained amend method by changing “will” to “may” so implementation becomes optional. Use a different schedule to identify features associated with special amenity landscapes to achieve the clarity of different characteristics associated with each.
Protect or enhance the values of special amenity landscapes and highly valued natural features, by: a) Avoiding significant adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and b) Avoiding, remedying or mitigating other adverse effects on other values; and c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and d) Recognising and providing for positive contributions of existing introduced species to those values; and e) Controlling the adverse effects of pest species, preventing their introduction and reducing their spread; and f) Encouraging enhancement of those values.	Port Otago Limited	58			
	PowerNet Limited	60			
	HW Group Richardson Limited	61			
	Waitaki District Council	70			
	Trustpower Limited	85			
	Blueskin Resilient Communities Trust	87			
	Transpower New Zealand Limited	97			
Oceana Gold (New Zealand) Limited	140				
49: Policy 2.2.7 – Identifying the landward extent of the coastal environment.	Alliance Group Limited	56	Amend Insert a map to show extent of coastal environment	Neutral	
Identify the landward extent of the coastal environment, using the	PowerNet Limited	60			
	Aurora Energy	76			

<p>following criteria:</p> <p>a) Area or landform dominated by coastal vegetation or habitat of indigenous coastal species; and</p> <p>b) Landforms and the margins of landforms where active coastal processes, influences or qualities are significant; and</p> <p>c) Any landscapes or features, including coastal escarpments, which contribute to the natural character, visual quality or amenity values of the coast; and</p> <p>d) Any physical resource or built form, including infrastructure, that has modified the coastal environment and retains a connection to or derives character from connection to the coast; and</p> <p>e) The relationship of takata whenua with the coastal environment.</p>	Limited				
	KiwiRail Holding	69	Support – Retain as notified	Support	
	Alliance Group Limited	56	Amend- Consistency with NZCPS (policy 1)	Support	
	PowerNet Limited	60			
	Director General of Conservation	117			
<p>57: Policy 2.2.15 – Managing Highly valued Soil Resources</p> <p>Protect the values of areas of highly valued soil resources, by:</p> <p>a) Avoiding significant adverse effects on those values which contribute to the soil being highly valued; and</p> <p>b) Avoiding, remedying or mitigating other adverse effects on values of those soils; and</p> <p>c) Assessing the significance of adverse effects on values, as</p>	NZ Pork Industry	83	Amend - Amend 2.2.15 d) by adding a qualifier that the appropriateness is dependent on the requirement for primary production to be assessed first.	Oppose	
	Central Otago District Council	37	Amend - Refer to "highly valued soils". Delete Policy 2.2.15 c).	Support in Part	
	Alliance Group Limited	56	Oppose – Delete this policy	Oppose	
	PowerNet Limited	60			
	HW Richardson group Limited	61			
	Trustpower Limited	85			

detailed in Schedule 3; and d) Recognising that urban expansion may be appropriate due to location and proximity to existing urban development and infrastructure.	Clutha Agricultural Development Board		Amend – Delete d)	Oppose	d) recognises the existing situation of some urban areas and the constraints to their further expansion
	Ballance Agri-Nutrients Limited Dunedin City Council	156			
76: Objective 3.1 – Protection, use and development of natural and physical resources recognises environmental constraints 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. For example, there should be sufficient water supply available for a proposed activity.	Alliance Group	56	Oppose – delete objective 3.1	Support	Oppose – Delete or revise to focus on the key resilience issues, such as self-sufficiency.
	Trustpower Limited	85			
Blueskin Resilient Communities Trust	87				
The Fertiliser Association of New Zealand	110				
	PowerNet Limited	60	Amend - make the objective clearer for implementation and understanding of what is an environmental constraint or delete.	Support	
	HW Richardson Group Limited	61			
	Queenstown Airport Corporation	122			
78: Policy 3.1.1 – Recognising natural and physical environmental constraints 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, including: a) The availability of natural resources necessary to sustain the	Alliance Group	56	Oppose – Delete policy 3.1.1	Support	Oppose – Delete or revise to focus on the key resilience issues, such as self-sufficiency.
	HW Richardson Group Limited	61			
	Trustpower Limited	85			
	Blueskin Resilient Communities Trust	87			
	Fonterra Co-operative Group	99			

<p>activity; and b) The ecosystem services the activity is dependent on; and c) The sensitivity of the natural and physical resources to adverse effects from the proposed activity/land use; and d) Exposure of the activity to natural and technological hazard risks; and e) The functional necessity for the activity to be located where there are significant constraints.</p>	<p>Limited The Fertiliser Association of New Zealand Queenstown Airport Corporation</p>	<p>110 122</p>			
<p>99: Policy 3.4.2 – Managing Infrastructure Activities</p> <p>Manage infrastructure activities, to: a) Maintain or enhance the health and safety of the community; and b) Reduce adverse effects of those activities, including cumulative adverse effects on natural and physical resources; and c) Support economic, social 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</p>	<p>Dunedin City Council</p>	<p>156</p>	<p>Amend- Delete policy. In the event the policy is retained, include additional conditions to recognise: Infrastructure should be fit for purpose. Public infrastructure should be cost-effective, efficient, effective and appropriate. Provide a clear description in the methods of how each of the provisions in this policy will be given effect to.</p>	<p>Support</p>	

services.					
107: Objective 3.6 – Energy supplies to Otago’s communities are secure and sustainable	Save The Otago Peninsula Trust (STOP) Incorporated Society	88	Support – retained as notified	Support	This objective is critical for the functioning of the region
	Transpower New Zealand Limited	97			
	Fonterra Co-operative Group Limited	99			
	Otago Civil Defence Emergency Management Group	100			
	Horticulture New Zealand	124			
	Remarkables Park and Queenstown Park Limited	147			
114: Policy 3.6.6 – Reducing Long term demand for fossil fuels Reduce the long term demand for fossil fuels from Otago’s communities, by: a) Encouraging the development of compact and well integrated urban areas, to reduce travel needs within those areas; and b) Ensuring that transport infrastructure in urban areas has	Dunedin City Council	156	Amend - Reword the policy as follows: "Reduce the long term demand for fossil fuels by... (a) Encouraging the development of compact and well integrated urban areas, to reduce travel needs within and between those areas... (b)(ii) ...and integration with public transport where available;"	Support	

<p>good connectivity, both within new urban areas and between new and existing urban areas, by:</p> <ul style="list-style-type: none"> i. Placing a high priority on walking, cycling, and public transport, where appropriate; and ii. Maximising pedestrian and cycling networks connectivity, and integration with public transport; and iii. Having high design standards for pedestrian and cyclist safety and amenity; and <p>c) Enabling the development or upgrade of transport infrastructure and associated facilities that:</p> <ul style="list-style-type: none"> i. Increase freight efficiency; or ii. Foster the uptake of new technologies for more efficient energy uses, or renewable or lower emission transport fuels. 					
<p>115: Objective 3.7 – Urban areas are well designed, sustainable and reflect local character</p>	<p>NZ Transport Agency</p> <p>Save the Otago Peninsula (STOP) Incorporated Society</p> <p>Director General of Conservation</p> <p>Heritage New Zealand Pouhere Taonga</p>	<p>78</p> <p>88</p> <p>117</p> <p>120</p>	<p>Support – Retain as notified</p>	<p>Support</p>	<p>This objective helps achieve other CDC outcomes</p>
	<p>Blueskin Resilient</p>	<p>87</p>	<p>Amend - to reflect all residential development. Not only</p>	<p>Neutral</p>	

	Communities		urban areas		
120: Policy 3.7.3 – Designing for Warmer Buildings Encourage the design of subdivision and development 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) Insulating to warmer standards than those set under building legislation.	Blueskin Resilient Communities Trust	87	Amend - Amend policy as follows: "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) Incorporating energy saving technology into the development; and <u>b) c) Insulating to warmer standards than those set under building legislation; and</u> <u>d) Making provision for solar hot water equipment to be installed including solar ready hot water cylinders, plumbing and ducting."</u>	Neutral	
	Wise Response Society Inc.	114	Amend - as follows: "Policy 3.7.3 Requiring D esigning for <u>sustainable and energy efficient</u> warmer buildings".	Oppose	
122: Objective 3.8 -Urban growth is well designed and integrates effectively with adjoining urban and rural environments	Alliance Group Limited	56	Support – retain as notified (or similar wording to achieve the desired relief)	Support	Amend – integrates effectively
	PowerNet Limited	60			
	HW Richardson Group Limited	61			
	NZ Transport Agency	78			
	Darby Planning LP	81			
	Trustpower limited	85			
	Fonterra Co-operative Group Limited	99			
AgResearch Ltd.	116				

	Queenstown Airport Corporation	122			
	Horticulture New Zealand	124			
	Balance Agri-Nutrients Limited	141			
124: Policy 3.8.1 – Managing Urban growth	Dunedin City Council	156	Amend – Delete f)	Support	f) is beyond the scope of urban growth management
125: Policy 3.8.2 – Controlling growth where there are identified urban growth boundaries or future urban development areas	Waitaki District Council	70	Amend- Delete reference to schedule 8	Support	Delete reference to schedule 8 and schedule 8 itself
	Dunedin City Council	156	Amend - as follows: "Where urban growth boundaries, as detailed in Schedule 8, or future urban development areas, are needed to control urban expansion identified in a District Plan or in the RPS (Schedule 8), control the release of land..."	Support	

126- Schedule 8 – Urban Growth Boundaries	Waitaki District Council		Oppose – delete schedule 8	Support	
	Darby Planning LP				
	Royalburn Farming Company Limited	102			
		103			
	Walter Peak Station Limited	104			
	Milbrook Country Club	105			
	Eastburn Farm				
	RCL Queenstown PTY Ltd	106			
	Damper Bay Estates Ltd	107			
	Halfway Bay Station	108			
	Water Tight Investments	109			
		129			
	Soho Basin Skifield Limited	130			
	Northlake Investments Limited	131			
Shotover Country Limited	132				

	Ayrburn Farm Developments Limited	133			
	Bridesdale Farm Developments Limited	134			
	Glencoe Station Limited	135			
	Treble Cone Investments Limited	136			
	Woodlot Properties Limited	137			
	Henley Downs Farm Holdings Limited	138			
	Real Journeys				

<p>127: Policy 3.8.3 – Managing fragmentation of rural land</p> <p>Manage subdivision, use and development of rural land, to:</p> <p>a) Avoid development or fragmentation of land which undermines or forecloses the potential of rural land:</p> <p>i. For primary production; or</p> <p>ii. In areas identified for future urban uses; or</p> <p>iii. In areas having the potential for future comprehensive residential development; and</p> <p>b) Have particular regard to whether the proposal will result in a loss of the productive potential of highly versatile soil, unless:</p> <p>i. The land adjoins an existing urban area and there is no other land suitable for urban expansion; and</p> <p>ii. 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</p> <p>iii. reverse sensitivity effects on rural productive activities can be avoided; and</p> <p>c) Avoid unplanned demand for provision of infrastructure, including domestic water supply and waste disposal; and</p> <p>d) Avoid creating competing</p>	Egg Producers Federation of New Zealand	29	Amend - Replace "soil" by "land" throughout the Policy	Oppose	
	Central Otago District Council	37	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	Support	
	Radio New Zealand	57	Amend - Retain this policy with the following addition (or words to similar effect): "e) Avoid the potential for reverse sensitivity effects on established activities.	Oppose	Policy already addresses reverse sensitivity
	Waitaki District Council	70	Amend Policy 3.8.3 b) iii. to "reverse sensitivity effects on rural productive activities can be minimised where possible; and" Delete Policy 3.8.3 d).	Support	
	NZ Transport Agency	78	Amend Policy 3.8.3(c) to read as follows: "Avoid unplanned demand for provision or upgrading of infrastructure, including domestic water supply and waste disposal."	Support	
	Rayonier Matariki Forests Limited	84	Amend - Policy's first sentence as follows: "Managing fragmentation subdivision, use and development of rural land". Amend (b)(iii) as follows: " iii. c) Avoid reverse sensitivity effects on rural productive activities can be avoided ; and..."	Oppose	
	Save the Otago Peninsula (STOP) Incorporated Society	88	Add a fourth sub item under 3.8.3 a): "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."	Oppose	
	McKeague Consultancy Ltd	89	Amend 3.8.3(a)(i) by replacing "avoid" with "avoid and minimise" or "minimise". Amend (d) to make it clearer that primary production is one of the key priority uses for water and soil.	Support In Part	(d) should be removed as demand for resources can not always be avoided
	Fonterra Co-operative Group	99	Delete clause a)iii. Reword Clause b) and b)ii to refer to "highly valued soils" in place of "highly versatile soils". Delete Clause d).	Support In part	Support to delete clause (d)

demand for water or other resources.	Royalburn Farming Company Limited	102	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 or <u>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. 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 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 or other resources. "	Oppose	
	Walter Peak Station Limited	103			
	Milbrook Country Club	104			
	Eastburn Farm	105			
	RCL Queenstown PTY Ltd	106			
	Damper Bay Estates Ltd	107			
	Halfway Bay Station	108			
	Water Tight Investments	109			
	Soho Basin Skifield Limited	129			
	Northlake Investments Limited	130			
	Shotover Country Limited	131			
Ayrburn Farm Developments Limited	132				
Bridesdale Farm	133				

	Developments Limited				
	Glencoe Station Limited	134			
	Treble Cone Investments Limited	135			
	Woodlot Properties Limited	136			
	Henley Downs Farm Holdings Limited	137			
	Real Journeys	138			
	Federated Farmers of New Zealand	115	Oppose - Delete Policy 3.8.3	Oppose	
<p>133: Policy 3.9.4 – Managing the Use of Contaminated Land</p> <p>Manage the use of contaminated land, to protect people and the environment from adverse effects, by:</p> <p>a) 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</p> <p>b) Where there is contamination:</p> <p>i. Requiring an assessment of associated environmental risks; and</p> <p>ii. Remediating land; and</p> <p>c) Considering the need for ongoing</p>	Dunedin City Council	156	<p>Amend - Consider if this policy is necessary.</p> <ul style="list-style-type: none"> 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 <u>human health</u> 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>" <p>NES for Assessing and Managing Contaminants in Soil to Protect Human Health.</p> <p>a) 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</p> <p>b) Where there is contamination:</p> <p>i. Requiring an assessment of associated environmental risks;</p> <p>and ii. Remediating land; and</p>	Support	

monitoring of contaminant levels and associated risks.			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 <u>environmental risks.</u> "		
134: Policy 3.9.5 - Avoiding the creation of new contaminated land Avoid the creation of new contaminated land.	Alliance Group Limited PowerNet Limited HW Richardson Group Limited Trustpower Limited Queenstown Airport Corporation Z Energy Limited, BP Oil NZ Limited and Mobil Oil NZ Limited Oceana Gold (New Zealand) Limited Dunedin City Council	56 60 61 85 122 128 140 156	Oppose – Delete policy	Support	
	New Zealand Petroleum and Minerals Peter and Margaret Hore	86	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."	Neutral	The policy should be removed as it is contradictory of other objectives and policies.
149: Policy 4.2.1 – Recognising Heritage items Recognise the following elements	Fonterra Co-operative Group	99	Oppose – Delete policy	Oppose	

<p>as characteristic or important to Otago's historic heritage:</p> <p>a) Residential and commercial buildings;</p> <p>b) Māori cultural and heritage values;</p> <p>c) 19th and early 20th century pastoral sites;</p> <p>d) Early surveying, communications and transport, including roads, bridges and routes;</p> <p>e) Early industrial heritage, including mills and brickworks;</p> <p>f) Gold mining systems and settlements;</p> <p>g) Dredge and ship wrecks;</p> <p>h) Coastal heritage, particularly takata whenua occupation sites and those associated with early European activity such as whaling;</p> <p>i) Memorials.</p>					
	Heritage New Zealand Pouhere Taonga	120	Support – retain as notified	Neutral	Support retaining policy with amendments to include other heritage items which are not listed.
	Straterra	151	Amend - Support subject to the following amendment sought [to item f]): "f) Gold and other mining systems and settlements	Support	
	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Amend - Reword as follows: "a[b]) Maori cultural and heritage values 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	Support	

			marae." • Add Method 1 - Kai Tahu Relationships		
150: Policy 4.2.2 – Identifying historic heritage	Central Otago District Council	37	Amend - Delete ", using the following attributes, detailed in Schedule 7."	Support	
Identify historic heritage places and areas of regional or national significance and their values, using the following attributes, detailed in Schedule 7: a) Physical values, including: i. Archaeological information; ii. Architecture; iii. Technology; iv. Scientific; v. Rarity; vi. Representativeness; vii. Integrity; viii. Vulnerability; ix. Context or group; b) Historic values, including: i. People; ii. Events; iii. Patterns; c) Cultural values, including: i. Identity; ii. Public esteem; iii. Commemorative; iv. Education; v. Takata whenua; vi. Statutory recognition.	Contact Energy Limited	74	Amend - Amend Policy 4.2.2 to read as follows: "Identify <u>the values</u> of historic heritage places and areas <u>to identify those</u> of regional and national significance, using the following attributes, detailed in Schedule 7." • Delete "rarity", "representativeness" and "integrity" from Policy 4.2.2. • Provide guidance as to how to apply the attributes to determine regional or national significance.	Oppose	Using the word 'of value' is ambiguous as to who determines the 'value'.
	Dunedin City Council	156	Amend - Amend as follows: "...using the following attributes, detailed in Schedule 7, or closely similar:" • Clarify in the method that the DCC will not be required to re-evaluate its scheduled items of historic heritage. • Alternatively, amend the attributes to be consistent with those used by the DCC.	Oppose	No certainty using 'or similar'.
155: Policy 4.3.1 – Managing for rural activities	Egg Producers Federation of New Zealand	29	Amend - Replace "soil" by "land" throughout the Policy	Oppose	Oppose – Remove Policy
Manage activities in rural areas, to support the region's economy and	NZ Transport Agency	78	Support – retain as notified	Oppose	

<p>communities, by:</p> <p>a) Enabling farming and other rural activities that support the rural economy; and</p> <p>b) Minimising the loss of soils highly valued for their versatility for primary production; and</p> <p>c) Restricting the establishment of activities in rural areas that may lead to reverse sensitivity effects; and</p> <p>d) Minimising the subdivision of productive rural land into smaller lots that may result in rural residential activities; and 23 May 2015 Proposed Regional Policy Statement for Otago Otago Regional Council 83 Part B Chapter 4 People are able to use and enjoy Otago's natural and built environment</p> <p>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.</p>	NZ Pork Industry	83			
	Z Energy Limited, BP Oil NZ Limited and Mobil Oil NZ Limited	128			
	Balance Agri-Nutrients Limited	141			
	Ravensdown Works Limited	143			
<p>156: Policy 4.3.2 – Managing land use in dry catchments</p> <p>Manage land use change in dry catchments, to avoid any significant reduction in water yield, by:</p> <p>a) Restricting any extension of forestry activities within those catchments that would</p>	Taranaki Smith	17	Support	Support	This policy correctly deals with a natural resource issue and land use change that may affect it
	Bruce Lambie	19			
	Matthew Sole	75			
	Forest and Bird NZ	98			
	Central Otago District Council	37	Oppose – delete policy	Oppose	

<p>result in a significant reduction in water yield, including cumulative reductions; and</p> <p>b) Minimising the conversion of tussock grasslands to species which are less able to capture and hold precipitation</p>	Landpro Limited	150			
	Peter Hore	66	<p>Amend - Amend Policy 4.3.2 as follows:</p> <p>"Managing land use change in dry catchments</p> <p>Manage land use change in dry catchments, to minimise any significant reduction in water yield, by:</p> <p>(a) <u>Supporting and encouraging pest control for pest species which may adversely affect water yield.</u></p> <p>a) Restricting any extension of forestry activities within those catchments that would result in a significant reduction in water yield, including cumulative reductions; and</p> <p>b) Minimising the conversion of tussock grasslands to species which are less able to capture and hold precipitation."</p>	Oppose	
	Waitaki District Council	70	<p>Amend - Define the Dry catchments in a Schedule to the RPS or specify a methodology whereby those catchments can be identified.</p> <p>Amend Method 4 to Policy 4.3.2 to "Regional Plan".</p>	Support	
	Rayonier Matariki Forests limited	84	<p>Amend Policy 4.3.2a) so that it does not single out forestry as follows: "a) Restricting any extension of forestry activities within those catchments that would result in a significant reduction in water yield, ..."</p>	Oppose	
	McKeague Consultancy Limited	89	<p>Amend - Finish policy after "yield" and delete (a) and (b).</p>	Oppose	
	Little Valley Station	148	<p>Amend - Remove clause 4.3.2 b).</p>	Oppose	
	Dunedin City Council	156	<p>Amend - Add "Promoting the planting of tussock grasslands and other high water yielding species".</p> <p>Add an associated method.</p>	Support	
<p>157: Policy 4.3.3 – Recognising the values of Otago’s central business districts</p> <p>Recognise the values of Otago’s central business districts, including</p>	Royalburn Farming Company Limited	102	<p>Amend as follows:</p> <p>"Recognising <u>and providing</u> for the values of Otago’s central business districts</p>	Oppose	<p>Remove Policy as it is beyond the scope of the RPS</p>
Walter Peak Station Limited	103	<p>Recognise and <u>provide</u> for the values of Otago’s central business districts, including as the primary focal point for social, cultural and economic activities within a</p>			

as the primary focal point for social, cultural and economic activities within a community.	Milbrook Country Club	104	community."		
	Eastburn Farm	105			
	RCL Queenstown PTY Ltd	106			
	Damper Bay Estates Ltd	107			
	Halfway Bay Station	108			
	Water Tight Investments	109			
	Soho Basin Skifield Limited	129			
	Northlake Investments Limited	130			
	Shotover Country Limited	131			
	Ayrburn Farm Developments Limited	132			
	Bridesdale Farm Developments Limited	133			
Glencoe Station Limited	134				

	Treble Cone Investments Limited	135			
	Woodlot Properties Limited	136			
	Henley Downs Farm Holdings Limited	137			
	Real Journeys	138			
158: Policy 4.3.4 – Managing the distribution of commercial activities in larger urban areas	Willowridge Developments Limited	26	Oppose – Delete Policy	Support	
Manage the distribution of commercial activities in larger urban areas, to maintain the vibrancy of the central business district and support local commercial needs, by: a) Enabling a wide variety of commercial, social and cultural activities in the central business district; and b) Encouraging the adaptive re-use of existing buildings in ways that complement commercial functions; and 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 d) Enabling smaller centres to	Scope Resources Ltd.	55	Support – retain policy	Oppose	
	Heritage New Zealand Pouhere Taonga	120			

service local community needs.					
159: Policy 4.3.5 - Managing for industrial land uses Manage the finite nature of land suitable and available for industrial activities, by: a) Providing specific areas to accommodate the effects of industrial activities; and b) Providing a range of land suitable for different industrial activities, including land extensive activities; and c) Restricting the establishment of activities in industrial areas that may result in: i. Reverse sensitivity effects; or ii. Inefficient use of industrial land or infrastructure.	Airways Corporation of New Zealand Limited	43	Support - retain	Oppose	
	Scope Resources Ltd	55			
	Alliance Group Limited	56			
	PowerNet Limited	60			
	HW Richardson Group Limited	61			
	Fonterra Co-operative Group Limited	99			
	The Fertiliser Association of New Zealand	110			
	Queenstown Airport Corporation	122			
	Z Energy Limited, BP Oil NZ Limited and Mobil Oil NZ Limited	128			
	Balance Agri-Nutrients Limited	141			
Remarkables Park Limited and Queenstown Park Limited	147	Oppose – Delete policy	Support		
Dunedin City Council	156	Amend - Add an additional condition to (c) as follows:	Oppose		

			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>160: Policy 4.3.6 – Managing locational needs for mineral gas exploration, extraction and processing</p> <p>Recognise the needs of mineral exploration, extraction and processing activities to locate where the resource exists, and manage them by:</p> <p>a) Giving preference to avoiding their location in:</p> <p>i. Areas of significant indigenous vegetation and significant habitats of indigenous fauna; or</p> <p>ii. Outstanding natural features, landscapes and seascapes; or</p> <p>iii. Areas of outstanding natural character; or</p> <p>iv. Outstanding water bodies; or</p> <p>v. Areas subject to significant natural hazard risk; and</p> <p>b) Restricting the establishment of those activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects.</p>	Matthew Sole	75	Support – Retain	Support	
	Save The Otago Peninsula (STOP) Incorporated Society	88			
	Forest and Bird NZ	98			
	Director General of Conservation	117			
	PauaMAC Incorporated and The Otago Rock Lobster Industry Association Incorporated	5 80	80	Amend - Add the following item to (a): " vi) Areas of significance for existing activities that have a functional need to locate in that area; "	Oppose
NZ Pork Industry		83	Amend - Add to point a): " <u>avoiding there location in rural areas where there may be adverse effects on primary production activities</u>	Oppose	This is already dealt with in other objectives and policies
Holcim (New Zealand) Limited		92	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 , where possible, to avoiding their location in: [i. to v. unchanged]; and b) Restricting <u>Avoiding</u> the establishment of those activities in <u>or adjacent to areas used for mineral and gas exploration, extraction and processing or in areas containing or adjacent to regionally significant mineral resources that may result in reverse sensitivity effects or compromise future mineral extraction and processing activities.</u> c) <u>Identifying mineral deposits for future use and safeguarding the regionally significant ones from</u>		

			<u>inappropriate land use, subdivision and development, d) 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>		
	Royalburn Farming Company Limited	102	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) Giving preference to avoiding their location in <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 these activities in areas used for mineral and gas exploration, extraction and processing that may result in reverse sensitivity effects on mineral and gas exploration and extraction activities ."	Oppose	
	Walter Peak Station Limited	103			
	Milbrook Country Club	104			
	Eastburn Farm	105			
	RCL Queenstown PTY Ltd	106			
	Damper Bay Estates Ltd	107			
	Halfway Bay Station	108			
	Water Tight Investments	109			
	Soho Basin Skifield Limited	129			
	Northlake Investments Limited	130			
	Shotover Country Limited	131			

Ayrburn Developments Limited	Farm	132			
Bridesdale Developments Limited	Farm	133			
Glencoe Limited	Station	134			
Treble Investments Limited	Cone	135			
Woodlot Limited	Properties	136			
Henley Downs Holdings Limited	Farm	137			
Real Journeys		138			
Oceana Gold (New Zealand) Limited		140	Amend - (a) to recognise that sometimes mineral deposits and the values in (a) will coincide. 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."	Support	
Ravensdown Limited	Works	143	Amend - Amend para (b) by replacing "may" with "will" and inserting "significant" before "reverse". Amend to protect mineral reserves from inappropriate land uses.	Neutral	
Dunedin City Council		156	Amend - Clarify how a) will be given effect to. Provide for District Plans to determine appropriate levels of activities in these areas, if necessary.	Support	

<p>163: Policy 4.4.1 – Ensuring efficient water allocation</p> <p>Ensure an efficient allocation and use of water by:</p> <p>a) Requiring that the volume of water allocated does not exceed what is necessary for the purpose of use; and</p> <p>b) Requiring the development or upgrade of infrastructure that increases use efficiency; and</p> <p>c) Encouraging collective coordination and rationing of take and use of water when river flows or aquifer levels are lowering, to avoid breaching any minimum flow or aquifer level restriction; and</p> <p>d) Enabling water harvesting and storage, to reduce pressure on water bodies during periods of low flows.</p>	<p>Meridian Energy Limited</p>	<p>82</p>	<p>Amend - "b) Requiring the development or upgrade of infrastructure that increases use efficiency <u>where it is currently inefficient, and technically practicable</u>; and</p>	<p>Support</p>	
	<p>Waitaki Irrigators Collective Limited</p>	<p>113</p>	<p>Amend - Amend b) and c) as follows: "b) <u>where appropriate</u>, give preference to the development or upgrade of infrastructure ... c) <u>Encouraging collective coordination and collaborative catchment management processes</u> 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..."</p>	<p>Support</p>	
	<p>Federated farmers of New Zealand</p>	<p>115</p>	<p>Amend - b) Requiring the development or upgrade of infrastructure that increases use efficiency, <u>where economically feasible</u>; and...</p>	<p>Oppose</p>	<p>Oppose change of b) to specifying for economic purposes.</p>
	<p>Otago Water Resource Users Group</p>	<p>121</p>	<p>Amend - Amend b) as follows: "b) <u>Requiring</u>Encouraging the development or upgrade of infrastructure that increases use efficiency; and".</p>	<p>Support</p>	

			Support clause d).		
	Peter and Margaret Hore	146	Amend - Amend (b) by replacing "requiring" with "give preference to..."	Neutral	
166: Objective 4.5 – Adverse effects of using and enjoying Otago’s natural and built environment are minimised	Alliance Group Limited	56	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> "	Oppose	More than just ‘development use’ can affect the natural and built environment
	PowerNet Limited	60			
	HW Richardson Group Limited	61			
	Trustpower Limited	85			
	Queenstown Airport Corporation	122			
	Central Otago Environmental Society	59	Support – retain	Support	
	Aurora Energy Limited	76			
	Otago and Central South Island Fish and Game Council’s	118			
174: Policy 4.5.7 – Enabling offsetting of indigenous biodiversity	Otago Peninsula Biodiversity Group		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.	Support	
	Central Otago Environmental Society	59	Oppose – delete policy	Oppose	
	Oceana Gold (New Zealand) Limited	140			
Enable offsetting of adverse effects on indigenous biodiversity values, only when: a) The activities causing those effects have a functional necessity					

to locate in significant or outstanding areas; and b) Those effects cannot be avoided, remedied or mitigated; and c) Those effects do not result in the loss of irreplaceable or vulnerable biodiversity	Straterra	151			
	Holcim (New Zealand) Limited	92	Amend - the policy as follows: "Enable offsetting of adverse effects on indigenous biodiversity values, only when: a) The activities causing those effects have a functional necessity to locate in significant or outstanding areas; and/or <u>aa) The activities causing those effects are regionally or nationally significant; and etc."</u>	Neutral	
	Federated Farmers of New Zealand	115	Delete Clause a) with the subsequent clauses renumbered accordingly	Oppose	
	Environmental Defence Society Incorporated	127			
Director General of Conservation	117	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 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	Support in Part		

			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]."		
175: Policy 4.5.8 – Offsetting for Indigenous biodiversity Provide for offsetting for 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 b) The offset is undertaken close to the location of development, where this will result in the best ecological outcome; and c) The ecological values being achieved are the same or similar to those being lost; and d) The positive ecological outcomes of the offset last at least as long as the impact of the activity, if practicable.	Otago Peninsula Biodiversity Group	40	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. <ul style="list-style-type: none"> Amend sub-policy d) by removing the qualifying "if Practicable". 	Neutral	
	Central Otago Environmental Society	59	Oppose – Delete policy	Oppose	
	Oceana Gold (New Zealand) Limited	140			
	Straterra	151			
	Save The Otago Peninsula (STOP) Incorporated Society	88	Amend - Delete "if practicable" from item d).	Support	