

**Ravensdown Limited's Further Submission in Support of, or in
Opposition to, Submissions on Publicly Notified
Proposed Regional Policy Statement for Otago**
Form 6, Clause 8 of Schedule 1, Resource Management Act 1991



By Post: Otago Regional Council
Private Bag 1954, Dunedin 9054

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Name of further submitter: Ravensdown Works Limited ("Ravensdown")

This is a Further Submission on: The Proposed Regional Policy Statement for Otago ("RPS")

1. These further submissions are in support of in opposition to submissions on the RPS.
2. Ravensdown is a person who has an interest in the RPS that is greater than the interest the general public has. As explained earlier in Ravensdown's original submission and the submission on the consultation draft on the RPS:
 - (a) Ravensdown provides nutrient management services, technical advice, quality fertiliser and other essential farm inputs to farmers and other land users throughout Otago and New Zealand;
 - (b) Ravensdown is a co-operative primarily owned by farmers and it exists to optimise soil fertility and farm profitability in a sustainable way;
 - (c) Ravensdown has a processing factory located in Ravensbourne.
3. Ravensdown's further submission on the RPS is attached as **Attachment 1**.
4. Wherever Ravensdown has indicated support for a submission described in Attachment 1 that is to be interpreted as Ravensdown seeking that that part of the submitter's submission, as described in Attachment 1, is allowed. Wherever Ravensdown has indicated opposition to a submission described in Attachment 1 that is to be interpreted as Ravensdown seeking that that part of the submitter's submission, as described in Attachment 1, is disallowed.

5. Ravensdown does wish to be heard in relation to this submission.
6. If others make a similar submission, Ravensdown will consider presenting a joint case with them at a hearing.

Dated: 25 September 2015



Ravensdown (New Zealand) Limited

By its solicitors and duly authorised agents

ANDERSON LLOYD

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Attachment 1

The provision(s) listed in the "Summary of Decisions Requested – by provision" make up the heading for each section

Whole Regional Policy Statement (general support)

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Environment Southland	32	Support	<i>Support</i>	The RPS is well-presented and easy to comprehend. While Ravensdown has identified a number of matters that need to be changed (as per original Ravensdown submission) these can be satisfactorily achieved through the hearing process.

Whole Regional Policy Statement (general opposition)

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Environmental Defence Society Incorporated	127	Oppose	<ul style="list-style-type: none"> • <i>Withdraw the RPS; or</i> • <i>Amend so as to promote the sustainable management of natural and physical resources in the region, to comply with the RMA and to give effect to the relevant national policy statements</i> <i>[• Other specific relief sought in submission.]</i>	The RPS is not fundamentally flawed to the extent that it needs to be scraped, or essentially rewritten. Ravensdown therefore opposes the submission of the Environmental Defence Society Incorporated.

Whole Regional Policy Statement (overall approach)

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Central Otago Environmental Society	59	Oppose	<ul style="list-style-type: none"> • <i>The RPS, and ORC's proposed integrated approach, should rest on an over-arching set of fundamental principles, to which consequential regional and district planning</i> 	The RPS needs to enable the sustainable management and development of Otago's resources. This means the full range of options to manage the adverse effects of activities needs to be preserved. The submitter seems to want to pre-empt the regional and district plan making and resource consent processes by restricting the range of

			<p><i>documents, policies and management plans should comply.</i></p> <ul style="list-style-type: none"> • <i>Strengthen the language of policies to ensure "mitigation" and "off- setting" will not be used to betray those fundamental principles.</i> 	<p>potential outcomes through the RPS. That fails to recognise the complex nature of wise resource management decision-making which requires full consideration of the nature and sensitivity of the existing environment, the value and effects of proposed activities that will impart that environment, and the ways that any adverse effects can be managed.</p> <p>The RPS should <i>inform</i> those plan making and consenting processes by identifying what is important to Otago's people and communities and direct integrated decision-making. The RPS should not pre-determine outcomes by assuming, for example, that activities that have adverse effects on significant values must not promote sustainable management and therefore must be avoided.</p>
Fonterra Co-operative Group Limited	99	Support	<ul style="list-style-type: none"> • <i>Create additional provisions which specifically relate to regionally significant industry. These can adopt the model used in relation to regionally and nationally significant infrastructure.</i> • <i>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.</i> 	<p>Ravensdown recognises that there is a need to include more explicit provisions that recognise and provide for resources to be used for the benefit of people. Ravensdown supports the idea that regionally significant industry (such as the Ravensbourne Works) should receive similar recognition in the RPS as regionally significant infrastructure.</p>
Graymont NZ Limited	112	Support	<ul style="list-style-type: none"> • <i>Recognise the need to protect mineral resources from encroachment by incompatible land uses that could reasonably be located elsewhere.</i> 	<p>Protection of mineral resources from sterilisation or encroachment from other activities incompatible with the extraction of the resource is the appropriate counterbalance to proposed Policy 4.5.6 which seeks to manage the impact of mineral development on other values.</p>
Wise Response Society Inc	114	Oppose	<ul style="list-style-type: none"> • <i>Shift the focus of activity away from promoting economic development and financial return to sustainably managing of the natural and physical resources, as required under RMA S5.</i> • <i>Build region-wide and integrated</i> 	<p>The ORC's responsibility under the RMA is as set out in section 30 of the RMA and is to be exercised in accordance with Part 2. At its most fundamental level this is about promoting the sustainable management of Otago's natural and physical resources. One aspect of this is controlling adverse effects, but the submitter has overlooked the requirement to enable people and communities to provide for their social, economic and cultural well-being, and for their health and safety.</p>

			<i>resilience.</i>	
Wise Response Society Inc	114	Oppose	<i>Promote agro-ecological resilience at scale as a way to address a range of issues and needs.</i>	The consequences of this submission are unclear.

259 Regionally Significant issues

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Central Otago District Council	37	Support	<i>State the significant resource management issues for the Otago region.</i>	Ravensdown says that if the RPS is amended to explicitly state the region's significant resource management issues, this must include recognition of the important role of regionally significant industry such as the Ravensbourne Works, developed quarries and the importance of enabling the future exploration and development of the region's mineral resources.

255 Introduction – Overview and the Otago Region

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Straterra	151	Support	<i>Support ["The Otago Region" section (p. 4),] subject to amendment to [fourth paragraph]: "Agriculture <u>currently forms</u> has formed the basis of Otago's economic development and continues to be a major source of revenue, <u>as does mining for gold and other minerals, including aggregates.</u></i>	<p>Mining and quarrying in Otago makes a significant contribution to economic and social well-being, and does so in a sustainable way with carefully managed adverse effects.</p> <p>The inclusion of aggregates in this submission impliedly includes quarrying.</p>

24 Chapter B2 – general requests

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Forest and Bird NZ	98	Oppose	<ul style="list-style-type: none"> • <i>Add further objective: "Human activity supports the healthy functioning and resilience of naturally occurring ecosystems including where integrated with production systems"</i> • <i>Add an explanation that this objective seeks to halt and more so reverse the decline in Otago's biodiversity, and how retaining and enhancing indigenous habitats, will help halt the decline and why this is important for Otago's identity and economy.</i> 	Ravensdown agrees that biodiversity is an important resource management issue, but the RPS needs to ensure that objectives in relation to biodiversity sit within the broader framework of sustainable management. This means that maintenance and enhancement of biodiversity is not an absolute requirement, and the RPS (and lower order planning documents) needs to allow for situations where the overall promotion of sustainable management may entail some loss of biodiversity.
Environmental Defence Society Incorporated	127	Oppose	<p><i>Include a chapter focused on freshwater and incorporate the necessary provisions [i.e.: ...</i></p> <ul style="list-style-type: none"> • <i>Objectives relating to freshwater, including provision for the environmental bottom lines in the NPSFM;</i> • <i>Protection of all wetlands.</i> 	<p>While the RPS needs to give effect to the National Policy Statement for Freshwater Management 2011 ("NPSFM"), the NPSFM itself requires that it is implemented via regional plans not primarily through RPS's. By contrast the National Policy Statement for Renewable Electricity Generation 2011 ("NPSREG") requires relatively more implementation via the RPS rather than regional plans. The submitter seems to have overlooked this NPS.</p> <p>Also, an objective to protect all wetlands is opposed. An unquantified objective to protect all wetlands is unhelpful and will not promote sustainable management as required by the RMA.</p>
Environmental Defence Society Incorporated	127	Oppose	<p><i>Include a chapter focused on Outstanding Natural Features and Landscapes (ONFLs) and incorporating the necessary provisions to respond to the specific submissions contained in EDS' submission [i.e.: ...</i></p> <ul style="list-style-type: none"> • <i>Regionally significant issues</i> 	Ravensdown does not agree that the level of protection given to Outstanding Natural Features and Landscapes (" ONFLs ") is insufficient. In some cases ONFLs are defined on a very broad scale and are capable of assimilating significant modification. Any direction in the RPS, and any subsequent provisions in lower order planning documents, need to provide flexibility in the way ONFLs are managed so as to ensure future activities (such as important mineral developments) are not precluded. In such cases an inflexible approach to the protection of

			<i>relating to ONFLs;</i>	ONFLs may frustrate the sustainable management purpose of the RMA, recognising that in Otago the responsible development of our mineral resource is an appropriate use of land, including land that has outstanding landscape qualities provided the impacts are carefully managed.
Environmental Defence Society Incorporated	127	Oppose	<p><i>Include a chapter focused on the coastal environment [biodiversity and Significant Ecological Areas (SEAs)] and incorporating the necessary provisions to respond to these submissions[i.e.</i></p> <ul style="list-style-type: none"> <i>• Specific resource management issues relating to biodiversity and SEAs;</i> <i>• Specific objectives relating to biodiversity and SEAs;</i> <i>• Provisions relating to biodiversity and SEAs in the marine environment;</i> <i>• Provisions identifying activities which adversely affect biodiversity and SEA areas, and providing a course of action to respond to these;</i> <i>• A complete and specific set of criteria for a valid biodiversity offset and for assessing "significance".]</i> <p><i>Examples of biodiversity and SEA provisions are attached in Annexure 2-D.</i></p> 	Ravensdown does not agree that the RPS does not go far enough to protect the 'persistence' of biodiversity and ecosystem functions.

265 Outcome 2 and Introduction

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Waitaki District Council	70	Support	<i>Amend the 2nd paragraph of the introduction to Chapter B2 to: " It is critical to recognise the value we place on Otago's natural resources and to manage these resources accordingly. This includes identifying resources which we want to preserve maintain for future generations."</i>	"Maintain" is a more appropriate word than "preserve" in this context.

269 Introduction to Objective 2.1

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Fonterra Co-operative Group Limited	99	Support	<i>Amend the explanatory text to Objective 2.1 as follows: ... A good quality resource management framework addresses all-identifies the values <u>that apply attached</u> to our resources, and identifies those which need protection and the objectives that are sought to be met in respect of those values. Once identified, it is acknowledged that the values and objectives that apply to individual natural and physical resources may conflict with each other - example, we depend on water for food production, yet we want water for healthy rivers. A good quality resource</i>	An RPS which emphasises the need to strike an appropriate balance between conflicting values and objectives is better suited to Otago's needs than one which "picks winners".

			<u>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>	
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30 Policy suite 2.1 – The values of natural resources are recognised, maintained or enhanced

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Meridian Energy Limited	82	Support	<ul style="list-style-type: none"> • <u>Delete policies 2.1.1 and 2.1.2 and add a new policy as follows:</u> <u>" Recognise the values of freshwater, and the beds of rivers, lakes, wetlands, and their margins, and manage them to:</u> <u>a) Protect outstanding water bodies and wetlands; and</u> <u>b) Maintain or enhance the natural functioning of rivers, lakes, and wetlands, their riparian margins, and aquifers; and</u> <u>c) Maintain ecosystem health and indigenous biodiversity; and</u> <u>d) Retain the range and extent of habitats provided by freshwater; and</u> <u>e) Maintain migratory patterns of freshwater species, unless detrimental to indigenous biodiversity; and</u> <u>f) Maintain or enhance natural character; and</u> <u>g) Avoid aquifer compaction, and seawater intrusion in aquifers; and</u> <u>h) Maintain or enhance coastal values supported by freshwater values; and</u> <u>i) Maintain good water quality or enhance it where it has been degraded; and</u> <u>j) Retain the quality and reliability of existing drinking water supplies; and</u> <u>k) Maintain Kai Tahu values; and</u> <u>l) Provide for other cultural values; and</u> <u>m) Maintain important recreation values; and</u> <u>n) Maintain the landscape and amenity values of rivers,</u> 	Ravensdown supports the submitter's request that where appropriate "maintain" should be used instead of "protect".

			<u>lakes, and wetlands; and</u> <u>o) Avoid the adverse effects of pest species, prevent their introduction and reduce their spread; and</u> <u>p) Mitigate the adverse effects of natural hazards, including flooding and erosion; and</u> <u>q) Maintain bank stability; and</u> <u>r) Maintain the ability of existing infrastructure to operate within their design parameter "</u> <u>Make any consequential amendments necessary to give effect to the relief sought.</u>	
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31 Policy 2.1.1 – Managing for freshwater values

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Wise Response Society Inc	114	Oppose	<p>Amend as follows:</p> <p>...</p> <p>a) <u>Protect and sustain Support healthy ecosystems function and restore degraded ecosystems in all Otago aquifers, and rivers, lakes, wetlands, and their margins; and</u></p> <p>...</p> <p>e)d) <u>Provide additional protection to significant and Protect outstanding water bodies and wetlands; and</u></p> <p>...</p> <p>i)j) <u>Retain and aim to improve the quality and reliability of raw water for existing drinking water supplies; and</u></p>	A policy to restore degraded ecosystems in all water bodies is unrealistic.

32 Policy 2.1.2 – Managing for the values of beds of rivers and lakes, wetlands, and their margins

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Alec Saunders	35	Oppose	Add a new paragraph to Policy 2.1.2: <u>"(m) Avoid and mitigate the adverse effects of construction, effluent, farming, forestry, mining and other practices that may introduce contaminants and damage conservation values".</u>	This addition is not appropriate.

33 Policy 2.1.3 – Managing for coastal water values

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Alec Saunders	35	Oppose	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>	This addition is not appropriate.
Southern District Health Board	51	Oppose	Support and add following clauses: • (k) ensure that where at all practicable to do so, stormwater discharges in the coastal environment are treated to the point that the effect of the discharge on the environment is no more than minor.	The stormwater discharge policy is a double up and is entirely unnecessary at this level of planning. The RMA in section 70 adequately prevents Councils from creating rules that will allow contaminants from entering the marine environment.
KiwiRail Holdings Limited	69	Support	Amend Policy as follows: ... <u>" j) Maintain the ability of existing infrastructure to operate within their design parameters. "</u>	Ravensdown supports this sensible inclusion.
Te Runanga	154	Oppose	...	There are many instances where the discharge is permissible through a

o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga			- Avoid discharge of contaminants (including wastewater) to coastal waters. ...	resource consent process. This addition is inappropriate in light of New King Salmon.
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34 Policy 2.1.4 – Managing for air quality values

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Forest and Bird NZ	98	Oppose	Add "d) ensure land uses and human activity generating air pollutants avoid adverse effects on visual amenity"	There may be instances where adverse effects on visual amenity may be justified for temporary activities and even some cases long term activities so long as they adequately mitigated or remedied. Avoid is overly strong in light of New Zealand King Salmon and if this amendment is retained it should include the words "mitigate or remedy rather than solely avoid.
Wise Response Society Inc	114	Oppose	Amend as follows: "Policy 2.1.4 <u>Managing air quality for ecosystem function and value</u> <u>Managing for air quality values</u> "	Management for entirely ecosystem function and value is not possible. Meeting a sustainable management outcome includes management for activities that provide for appropriate development and social and cultural well-being neither of which are ecosystem based entirely.

35 Policy 2.1.5 – Managing for soil values

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Matthew Sole	75	Oppose	<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" 	Ravensdown opposes this submission because these policies read like rules that are akin to an absolute prohibition on the degradation of soils.

Alliance Group Limited	56	Support	<i>Amend the policy as follows: "Recognise soil values, and manage soils, to: ... m) Maintain the ability to use soils for infrastructure and by those providing for the economic, health and safety and social wellbeing of the community. "</i>	Ravensdown supports this sensible submission.
OceanaGold (New Zealand) Limited	140	Support	<ul style="list-style-type: none"> • <i>Amend to clarify if there is a ranking or if it is acceptable to comply with one factor but not another.</i> • <i>Delete (k), or in the very least amended to say: "k) Avoid, <u>remedy or mitigate any potential contamination of soil,</u>"</i> • <i>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.</i> 	Ravensdown supports this sensible submission.

36 Policy 2.1.6 – Managing for ecosystem and indigenous biodiversity values

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
OceanaGold (New Zealand) Limited	140	Support	<ul style="list-style-type: none"> • <i>Amend to provide for instances where indigenous biodiversity values may not be maintained or enhanced.</i> • <i>Amend (a) to refer to indigenous biodiversity "at a regional <u>scale</u>".</i> • <i>Also amend (d) to read: "Protect <u>Promote</u> important hydrological services, including..."</i> 	<p>Ravensdown agrees that without these amendments the policy as written may preclude some mining activities which would also affect quarrying activities.</p> <p>Ravensdown also agrees there may be some situations where protection is not possible or a sustainable solution.</p>

38 Schedule 4 – Criteria for the identification of natural features and landscapes

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Fonterra Co-operative Group Limited	99	Support	<ul style="list-style-type: none"> • <i>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.</i> • <i>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).</i> • <i>Include express reference to outstanding landscapes being in the context of section 6 of the Act (and not more generally).</i> 	Ravensdown agrees with the submitter that care and clarity are required in approaching the issue of outstanding and other important landscapes, and supports in principle the suggested amendments.
Environmental Defence Society Incorporated	127	Oppose	<p><i>EDS supports the criteria however an assessment methodology is required. This should identify that the identification of ONFLS is a three step process comprising:</i></p> <ul style="list-style-type: none"> • <i>Identification of the landscape unit boundaries.</i> • <i>Ascertaining whether a landscape is sufficiently natural, acknowledging that there is a spectrum of naturalness and that a landscape does not have to be pristine to be considered natural.</i> • <i>Assessing whether the landscape</i> 	In the context of Otago where there is significant interplay between important or potentially outstanding landscape areas and regionally significant development there is a fourth step in the process – a recognition that careful development within these important landscapes in connection with regionally significant industry and infrastructure is appropriate.

			<i>is outstanding at a regional level, such that it is conspicuous, remarkable and stands out from the rest.</i>	
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39 Policy 2.1.8 – Recognising the values of natural character in the coastal environment

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Wise Response Society Inc	114	Oppose	<p><i>Amend as follows:</i></p> <p><i>"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 environmentRecognise the values of <u>the coastal environment, its conservation, sustainability of fisheries and natural character</u> in the coastal environment are derived from the following attributes <u>and manage the land and coastal environment to sustain or enhance these qualities:</u></i></p> <p><i>a) <u>Sustainable, functioning estuarine and marine ecosystems that are sustainable</u></i></p> <p><i>b) <u>Fish stocks that support a viable commercial fishery and valuable recreational fishery</u></i></p> <p><i>c) <u>Natural elements, processes and patterns;</u></i></p> <p><i>b)d) <u>Biophysical, ecological, geological and geomorphological aspects;</u></i></p> <p><i>e)e) <u>Natural landforms such as</u></i></p>	Ravensdown does not support this submission because it would result in the policy being too onerous.

			<p>headlands, peninsulas, cliffs, dunes, wetlands, estuaries, reefs, freshwater springs and surf breaks;</p> <p>df) The natural movement of water and sediment;</p> <p>bd) The natural darkness of the night sky;</p> <p>fh) <u>Pristine or highly natural places or areas that are wild or scenic and not spoilt by built structures or inappropriate activity ;</u></p> <p>g) <u>A range of natural character from pristine to modified;</u></p> <p>hi) Experiential attributes, including the sounds and smell of the sea; and their context or setting."</p>	
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40 Objective 2.2 – Otago's significant and highly valued natural resources

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Wise Response Society Inc	114	Oppose	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 mineral wealth is a significant natural feature and the development of this needs to be enabled. The submitter's suggested rewording of the objective makes no provision for this.

270 Introduction to Objective 2.2

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Straterra	151	Support	<i>Support [explanation to Objective 2.2 - page 32] subject to amendment [to the last sentence of the paragraph]: "Giving these a higher level of protection ensures they will be retained, while consumptive use of resources (e.g., mining, quarrying and petroleum production) will be directed to areas where adverse effects are more acceptable, if possible. If not, as minerals can only be mined where they exist, they may be recognised as appropriate activities in these areas dependent on the avoidance, remediation or mitigation measures adopted."</i>	The submitter's suggested amendments to the explanation to Policy 2.2 are appropriate to recognise the special position of mineral resources in Otago.
Port Otago Limited	58	Support	<i>Insert new policy: "<u>The avoidance of adverse effects required by policies 2.2.2, 2.2.4, 2.2.6, 2.2.9 and 2.2.11 does not prohibit any part of the operation or proposed development of activities related to the ports at Port Chalmers and Dunedin with any adverse effects from the ports' operations required to be either avoided, remedied or mitigated.</u>"</i>	Ravensdown recognises the importance to Otago of the ports at Dunedin and Port Chalmers and supports the changes the submitter requests. However, the approach requested should also apply to regionally significant infrastructure and industry including Ravensbourne.
Forest and Bird NZ	98	Oppose	<i>New Policy 2.2.8: "Identify the landward extent of margins of all freshwater bodies using the following criteria: a) area or landform where active riparian or lacustrine and/or</i>	The implications of the submitter's requested new policy are unclear. Unless it can be demonstrated that the request does not impact on existing and potential mineral development and current farming practices in Otago the request is opposed.

			<p>wetland processes, influences or qualities are significant including legible historic processes and influences ; and</p> <p>b) the area dominated by vegetation associated with the water bodies and providing habitat for species dependent on the water body and its margins including dry to wet environments;</p> <p>and</p> <p>c) any landscape and natural feature that significantly contributes to the natural character, visual amenity and recreational value of the substitute word for coast?? water body and its margin??</p> <p>e) the relationship of taka whenua with the margins of freshwater bodies"</p>	
Environmental Defence Society Incorporated	127	Oppose	<p>Apply the same management approach to the natural character of wetlands, and lakes and rivers and their margins</p> <p>as to the coastal environment, i.e. avoidance of adverse effects on outstanding areas and avoidance of significant adverse effects, and avoidance, remediation and mitigation of other adverse effects in other areas.</p>	Avoidance of adverse effects on outstanding areas is too rigid a requirement. Appropriate remediation, mitigation and / or compensation are also appropriate management responses, and this needs to be assessed on a case by case basis.
Soho Basin Skifield Limited	129	Support	<p>Add the following new policy:</p> <p>"Managing cross boundary landscape effects Promote alignment of District Plans and integrated assessments of environmental effects when assessing landscape values and</p>	Ravensdown supports integrated management to ensure that cross-boundary landscape effects and values are assessed on a consistent basis.

			<i>effects in landscapes which traverse territorial authority boundaries."</i>	
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42 Policy 2.2.1 – Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Forest and Bird NZ	98	Oppose	<ul style="list-style-type: none"> Amend to read: <i>"Identify and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna for terrestrial and freshwater environments using the criteria set out in Schedule 5 (being the schedule as amended by this submission)."</i> 	Policy 2.2.1 is about <i>identification</i> of significance. The submitter proposes to extend this to consequent actions. This is inappropriate.

43 Schedule 5 – Criteria for the assessment of significant indigenous vegetation and habitat of indigenous fauna

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Otago Peninsula Biodiversity Group	40	Oppose	<ul style="list-style-type: none"> Applaud the inclusion of these criteria in the RPS: the ORC should make all efforts to see these applied in all subordinate plans and policies across Otago. This Schedule may be the place to include criteria for environmental offsetting. 	Assessment of significance has nothing to do with the concept of biodiversity offsetting.
Darby Planning LP	81	Support	Amend Schedule 5 criteria, to make them more definitive, and in line with those used for the Canterbury Region.	Ravensdown has concerns about the potential for the proposed criteria of significance to result in too many of Otago's resources being affected. More clarity is required.

47 Policy 2.2.5 – Identifying special amenity landscapes and highly valued natural features

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Clutha District Council	28	Support	<ul style="list-style-type: none"> • Remove policy and associated reference in Method 4.2.2 • Alternatively, if the policy is to remain, amend method by changing "will" to "may" so implementation becomes optional. 	Ravensdown agrees there is no need for the RPS to identify a category of landscapes and natural features beyond those that are assessed as outstanding.

54 Policy 2.2.12 – Identifying outstanding water bodies and wetlands

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
OceanaGold (New Zealand) Limited	140	Support	<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. 	<p>Ravensdown agrees with all of OceanaGold's reasons. I.e.:</p> <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.

55 Policy 2.2.13 – Managing outstanding waterbodies and wetlands

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
The Fertiliser Association of New Zealand Inc	110	Support	<p>Amend as follows:</p> <p>"Protect the <u>significant</u> values of outstanding water bodies and wetlands by:</p> <p><u>a) Assessing the significance of adverse effects on significant values, as detailed in Schedule 3;</u></p> <p><u>and</u></p> <p>a) <u>b) Avoiding significant adverse</u></p>	<p>Ravensdown agrees with the Fertiliser Association's reason. I.e.:</p> <ul style="list-style-type: none"> • 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.

			<p>effects, including cumulative effects, on those <u>significant values</u> which contribute to the water body or wetland being outstanding; and</p> <p>b) c) Avoiding, remedying or mitigating other adverse effects on the water body or wetland's values; and</p> <p>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3;</p> <p>d) ..."</p>	
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56 Policy 2.2.14 – Identifying highly valued soil resources

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Fonterra Co-Operative Group Limited	99	Support	Retain Policy 2.2.14	Ravensdown supports the retention of this policy.

60 Policy 2.3.1 – Applying an integrated management approach among resources

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Port Otago Limited	58	Support	Add: " <u>c) Recognising the importance to the region of maintaining and developing appropriate infrastructure</u> "	<p>Ravensdown agrees with Port Otago's reasons. I.e.:</p> <ul style="list-style-type: none"> • Supports integrated management. • Policies 2.3.1 and 2.3.4 offer no actual guidance on the balance sought for integrated management of the coastal environment in Otago by providing no hierarchy on the role of the coastal environment as a working port, versus its natural and recreational values.
Straterra	151	Support	Support subject to [the addition of new item c)]: "c)	Ravensdown supports the inclusion of a new sub clause which better

			<i>Recognising that mining and quarrying and petroleum production earn high wealth off a small footprint, and are a temporary use of land, and that sites are rehabilitated to a former use, a new use or an enhanced use."</i>	recognises an integrated approach.
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64 Policy 2.3.5 – Applying an integrated management approach for airsheds

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Alliance Group Limited	56	Support	<i>Amend to recognise that in achieving integrated management the human use and economic values of the resource should also [be] taken into account.</i>	Including the human use and economic value provides for a more balanced approach to management.
Fonterra Co-Operative Group Limited	99	Support	Amend Policy 2.3.5 to read: "Apply an integrated management approach to activities that affect air quality, by: a) a) Setting emission standards for airsheds that take into account <u>and enable</u> foreseeable demographic and economic changes, and their effects on cumulative emissions; and b) Co-ordinating the management of land use and air quality, to: i Maintain or enhance air quality values <u>Achieve emission standards for airsheds;</u> and ii Reduce the potential for adverse health effects; and iii <u>Avoid the potential for reverse</u>	Ravensdown agrees with all of the submitters reasons. I.e.: <ul style="list-style-type: none"> • Supports intention to apply integrated management for airsheds. • Discharges to air are an essential aspect of industrial and a number of other activities. • What constitutes "unacceptable" depends on nature and effects of the discharge, rather than the current level of air quality. • It is unlikely that adverse effects from heating appliances (especially in urban areas) can be avoided, but reverse sensitivity effects can. • Provide clear direction to adopt a consistent approach to avoiding reverse sensitivity, to ensure that lower order plans provide for the continued operation and expansion of industrial activity.

sensitivity nuisance effects."

65 Chapter B3 – general requests

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Port Otago Limited	58	Support	<ul style="list-style-type: none"> • Have an objective that makes it clear that it is fundamental to the Otago Region's economy that the Dunedin and Port Chalmers ports are able to properly service the needs of the Otago regional economy. • Have policies that: • Make clear the fundamental importance to the Otago Region of the Dunedin and Port Chalmers ports; • Identify the need for the efficient and safe operation of the ports at Dunedin and Port Chalmers, the development of their capacity for shipping and their connection with other transport modes • Require any changes to ports' operations to, where possible, avoid remedy or mitigate adverse effects on the identified environmental values of the coastal environment. • Recognise: • The operations of the Dunedin and Port Chalmers ports have the potential to adversely affect the coastal environment; • In appropriate cases, the ports' operator may be authorised to carry out activities that have adverse effects that are otherwise required to be avoided by the plan and, in such cases, approval of the ports' operations requires it to be established that the benefits of the ports operations are greater than the adverse effects caused by them. 	Ravensdown supports this sensible submission but adds further that it should apply to all major infrastructure assets that operate on the harbour.
Fonterra Co-Operative Group Ltd	99	Support	<p>Amend the PRPS to include the following objectives and policies:</p> <p>"Objective [x] Regionally significant industries and associated activities are able to establish, operate and grow. Regionally significant industries, particularly primary production activities, are critical to the social and economic wellbeing of the regional community. These activities often have functional locational requirements and have a heavy reliance on the availability of and access to natural resources such as soils and water, and physical resources such as transport infrastructure networks. Recognising and</p>	Ravensdown supports the inclusion of appropriate objectives and policies reflecting the importance of regionally significant industries and associated activities including the Ravensbourne Works and other Ravensdown facilities throughout Otago.

			<p>providing for these requirements will support the integrated management of resources and the avoidance of activities that would threaten the continued operation of regionally significant industry."</p> <p>"Policy [X] Recognise and provide for the establishment, operation and expansion of regionally significant industries by;</p> <p>a) co-ordinating infrastructure and service provision at a scale appropriate to the activities likely to be undertaken;</p> <p>b) enabling the establishment and colocation of supporting activities;</p> <p>c) maintaining and where appropriate enhancing access to natural and physical resources, including regionally significant infrastructure;</p> <p>d) avoiding the potential for reverse sensitivity."</p> <p>"Policy [Y] Manage the adverse effects of regionally significant industries and associated activities by;</p> <p>a) Giving preference to the location of regionally significant industries away from outstanding natural features, outstanding landscapes and areas of significant indigenous vegetation and significant habitats of indigenous fauna, outstanding water bodies and wetlands; or</p> <p>b) Where the locations identified in a) above cannot be avoided, avoiding significant adverse effects on those values that contribute to the significance of the feature; and</p> <p>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3."</p>	
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78 Policy 3.1.1 – Recognising natural and physical environmental constraints

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Horticulture New Zealand	124	Support	<p>Amend Policy 3.1.1 e) as follows: "e)</p> <p>The functional necessity for the activity to be located where there are significant constraints <u>such as adverse effects on existing activities.</u>"</p>	Ravensdown supports this sensible extension to Policy 3.1.1.

87 Policy 3.2.7 – Reducing existing natural hazard risk

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Dunedin City Council	156	Support	Add a third bullet point to (d) as follows: <u>"iii. Mitigation of risk."</u>	Ravensdown supports the suggested addition to Policy 3.2.7.

88 Policy 3.2.8 – Applying a precautionary approach

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Wise Response Society Inc	114	Oppose	<p>Amend as follows:</p> <p><u>"Policy 3.2.8 Applying the a precautionary principle across all policies approach</u></p> <p>Where natural hazard risk is uncertain or unknown, but potentially significant or irreversible, apply a precautionary <u>principle approach</u> to identifying, assessing and managing that risk.</p> <p><u>For the purposes of this plan the precautionary principle and approach means that if an action or policy has a suspected risk of causing harm to the public or the environment, in the absence of extensive scientific consensus that the action or policy is not harmful, the burden of proof that it is not harmful falls on those taking action.</u></p> <p><u>The principle implies that there is social responsibility to</u></p>	Ravensdown does not support changing Policy 3.2.8 as the submitter requests. The additional wording the submitter seeks is unhelpful, and the intention for it to have effect throughout the RPS rather than in relation to natural hazards is inappropriate.

			<u>protect the public from exposure to harm, when scientific investigation has found a plausible risk. These protections can be relaxed only if further scientific findings emerge that provide sound evidence that no harm will result. "</u>	
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96 Objective 3.4 – Good quality infrastructure and services meet community needs

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Dunedin City Council	156	Oppose	<ul style="list-style-type: none"> • Remove the objective. • In the event the objective is retained, clarify what is meant by "services" in the issue, and whether this includes "lifeline utilities" and /or "hazard mitigation measures". 	Ravensdown prefers to see the retention of this objective. The relatively remote location of some quarries and farms means that Ravensdown and some farmers rely upon good quality infrastructure and services to enable it to operate efficiently. Infrastructure and services need to be supported as they are a significant regional resource management issue.

286 Introduction to Objective 3.5

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Fonterra Co-Operative Group Ltd	99	Support	<p>Amend the introduction to Objective 3.5 (p. 59) as follows:</p> <p>"Infrastructure of national and regional significance, including roads, rail, electricity generation and transmission, and telecommunications, and regionally significant industries <u>associated with primary production (such as dairy processing)</u> are part of a national network, and contribute to the economic and social wellbeing of</p>	Ravensdown supports the amendment requested by the submitter to address the role of regionally significant industry, and seeks that quarrying and fertiliser production be specifically mentioned alongside dairy processing.

the nation..."

147 Objective 4.2 – Historic heritage resources are recognised and contribute to the region's character and sense of identity

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Director-General of Conservation	117	Oppose	Amend as follows: "Objective 4.2 Historic heritage resources are recognised and <u>protected, and continue to contribute to the region's character and sense of identity</u> "	Ravensdown opposes the requested changes to this objective. Historic resources should be recognised, but protection of them is only one possible outcome.

155 Policy 4.3.1 – Managing for rural activities

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Straterra	151	Support	Support subject to the following amendments: "Manage activities in rural areas, to support the region's economy and communities, by: a) <u>Enabling farming and other rural activities, including minerals and petroleum</u> activities, that support the rural economy; and b) <u>Avoiding, remedying or mitigating</u> Minimising the loss of soils highly valued for their versatility for primary production; and c) Restricting the establishment of activities in rural areas that may lead to reverse sensitivity effects; and d) <u>Avoiding, remedying or mitigating</u> Minimising the subdivision of productive rural land into smaller	Quarrying is a productive rural activity that supports the rural economy to a significant extent, especially in Otago. Ravensdown supports the identification of minerals-related activities alongside farming in Policy 4.3.1.

			<p><u>allotments</u> lots that may result in rural residential activities; and</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 <u>and minerals and petroleum activities.</u>"</p>	
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160 Policy 4.3.6 – Managing locational needs for mineral, gas exploration, extraction and processing

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
New Zealand Petroleum and Minerals	86	Support	<p>Amend policy 4.3.6 as follows:</p> <p>"Policy 4.3.6 Managing locational needs for mineral and gas <u>petroleum</u> 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 <u>Implementing methods to achieve integrated management of natural and physical resources, in particular in:</u></p> <p>...</p> <p>b) Restricting the establishment of those activities in areas used for mineral and gas <u>petroleum</u> exploration, extraction and processing that may result in reverse sensitivity effects."</p>	<p>Policy 4.3.6 should be more enabling of mineral development. As currently worded it focuses inappropriately on avoiding conflicts between mineral use and other values by avoiding mineral development in these places. That does not achieve a balanced and integrated approach, does not facilitate the use of techniques other than avoidance, and may not promote sustainable management.</p>

301 Introduction to Objective 4.5

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Straterra	151	Support	<p><i>Support [explanation to Objective 4.5 - page 87] subject to the following amendment [to first and second paragraphs]:</i></p> <p><i>Any use of natural or physical resources has the potential to generate adverse effects. It is important to manage activities to avoid, <u>remedy or mitigate</u>, individually or cumulatively, <u>significant adverse effects on degrading</u> the quality of Otago's natural environment. This requires the proactive management of natural resources, and can only be achieved through the integrated management of Otago's natural resources, and by giving due consideration to both managing adverse effects and maintaining and enhancing environmental values, <u>in the context of the benefits for Otago from the use and development of these resources</u>.</i></p> <p><i>Resource use can also have adverse effects on other uses, <u>future uses</u>, or prevent the normal operation of existing uses. Resource management decisions are often about arbitrating between conflicting values or uses. For example, Section 2.3 of this document identifies resources which are so significant</i></p>	<p>The submitter's suggested amendments better provide for a balanced approach to managing conflicting values or uses.</p>

			<p><i>that adverse effects on their values should be avoided, <u>remedied or mitigated appropriately</u>. Some activities, such as mineral <u>and petroleum</u> extraction or infrastructure development <u>or electricity generation</u>, may have to locate in areas containing significant values. If we are to provide for those activities, it is important to outline how their adverse effects should be managed.</i></p>	
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168 Policy 4.5.1 – Avoiding objectionable discharges

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Fertiliser Association of New Zealand Inc	110	Support	<p><i>Amend as follows:</i></p> <p><i>"Policy 4.5.1 Avoiding objectionable discharges</i></p> <p><i>Avoid, <u>remedy or mitigate</u> discharges that are objectionable or offensive to takata whenua and the wider community, including:</i></p> <p><i>a. Discharges of human or animal waste:</i></p> <p><i>i. Directly to <u>waterbodies</u>; or</i></p> <p><i>ii. In close proximity to <u>waterbodies</u>; or</i></p> <p><i>iii. In close proximity to mahika kai sites; or</i></p> <p><i>b) Discharges of hazardous or noxious substances close to sensitive activities, including:</i></p> <p><i>i. Residential activities; or</i></p> <p><i>ii. Schools and other educational activities; or</i></p>	Ravensdown supports the extension of this policy to include remedying and mitigating (as well as avoiding) the effects of objectionable discharges. This should read in conjunction with Ravensdown's original submission on this policy.

			<p>iii. Places of public access to the natural environment Publicly accessible areas in the natural environment; or</p> <p>iv. In close proximity to mahika kai sites; or</p> <p>c) Odorous or conspicuous discharges."</p>	
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173 Policy 4.5.6 – Managing adverse effects from mineral and gas exploration, extraction and processing

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Director-General of Conservation	117	Oppose	<p>Amend as follows:</p> <p>"Minimise adverse effects from the exploration, extraction and processing of minerals, by: ...</p> <p>g) Considering<u>Require</u> the use of offsetting, or compensatory measures, for residual adverse effect ..."</p>	Offsetting is a tool which may or may not be appropriate in any particular circumstances. To <i>require</i> its use is inappropriate.

174 Policy 4.5.7 – Enabling offsetting of indigenous biodiversity

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Director-General of Conservation	117	Oppose	<p>Replace policy 4.5.7 and policy 4.5.8 with one new policy 4.5.7 as follows:</p> <p>"Manage the effects of activities on indigenous biodiversity by:</p> <p>a) avoiding as far as practicable, and where total avoidance is not practicable, minimising adverse effects on indigenous biodiversity</p> <p>b) requiring remediation where adverse effects cannot be avoided</p> <p>c) requiring mitigation where adverse effects on the areas identified above cannot be avoided or remediated</p>	Ravensdown does not support the proposed new version of Policy 4.5.7 suggested by the submitter, and does not support the inclusion of the proposed new Schedule relating to biodiversity offsets. Offsetting should not be mandatory in any circumstances, and any offsetting policy should not specify circumstances when offsetting must and must not be used. The submission appears to be trying to inappropriately elevate the status of

			<p>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:</p> <p>e) enabling any significant residual adverse effects to indigenous biodiversity that does not meet the significance criteria detailed in Schedule 5 to be offset through 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]."</p>	the August 2014 "Guidance". There may be an inconsistency between the submitter's requests and the way the submitter approaches offsets on land it manages.
Director-General of Conservation	117	Oppose	<p>Include the following new schedule:</p> <p>"Schedule XX Biodiversity Offsetting</p> <p>The following sets out a framework for the use of biodiversity offsets. It should be read in conjunction with the NZ government Guidance on Good Practice Biodiversity Offsetting in New Zealand. August 2014 (or any successor document):</p> <ol style="list-style-type: none"> 1. Restoration, enhancement and protection actions will only be considered a biodiversity offset where they are used to offset the anticipated residual effects of activities after appropriate avoidance, minimisation, remediation and mitigation actions have occurred as per the policies in B4.3.4, i.e. not in situations where they are used to mitigate the adverse effects of activities. 2. Restoration, enhancement and protection actions undertaken as a biodiversity offset are demonstrably additional to what otherwise would occur, including that there are additional to any remediation or mitigation undertaken in relation to the adverse effects of the activity. 3. Offset actions should be undertaken close to the location of development, where this will result in the best ecological outcome. 4. The values to be lost through the activity to which the offset applies are counterbalanced by the proposed offsetting activity which is at least commensurate with the adverse effects 	As above

			<p>on indigenous biodiversity, so that the overall result is no net loss, and preferably a net gain in ecological values.</p> <p>5. The offset is applied so that the ecological values being achieved through the offset are the same or similar to those being lost.</p> <p>6. As far as practicable, the positive ecological outcomes of the offset last at least as long as the impact of the activity and preferably in perpetuity. Adaptive management responses should be incorporated into the design of the offset, as required to ensure that the positive ecological outcomes are maintained over time.</p> <p>7. The biodiversity offset should be designed and implemented in a landscape context - i.e. with an understanding of both the donor and recipient sites role, or potential role in the ecological context of the area.</p> <p>8. The consent application identifies the intention to utilise an offset, and includes a biodiversity offset management plan that:</p> <ul style="list-style-type: none"> i. sets out baseline information on indigenous biodiversity that is potentially impacted by the proposal at both the donor and recipient sites ii. demonstrates how the requirements set out in this appendix will be addressed, iii. identifies the monitoring approach that will be used to demonstrate how the matters set out in this appendix have been addressed, over an appropriate timeframe. (While this appendix sets out a framework for the use of biodiversity offsets in Otago, many of the concepts are also applicable to mitigation actions i. e. where an overall outcome of no net loss (and preferably a net gain) in biodiversity values cannot be ensured but restoration and protection actions will be undertaken.)" 	
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175 Policy 4.5.8 – Offsetting for indigenous biodiversity

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Environmental Defence Society Incorporated	127	Oppose	<i>Add additional criteria to encapsulate all best practice offsetting principles. (See annexure 2-D of submission).</i>	Ravensdown agrees that where offsetting is used, it should be approached in a structured way. However, there are various guidelines and approaches available, and they are not all consistent. While the RPS should not <i>preclude</i> the use of this technique it should not be <i>required</i> , and the approach to offsetting must not be specified.

192 Method 4 – City and District Plans

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Graymont (NZ) Ltd	112	Support	<i>Amend to require Councils to:</i> <ul style="list-style-type: none"> <i>Identify regionally significant mineral resources and mineral extraction activities to be protected from reverse sensitivity effects; and</i> <i>Apply buffers and setbacks to regionally significant mineral resources and mineral extraction activities to avoid reverse sensitivity effects.</i> 	Protection of mineral resources from reverse sensitivity effects from other activities incompatible with the extraction of the resource is an appropriate approach to manage mineral development and the impact of other activities on it.

198 Method 6.1 – Identification of Important resources

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Powernet Limited	60	Support	<i>Add methods to require that:</i> <ul style="list-style-type: none"> <i>a region wide landscape/features and natural character assessment to determine areas of outstanding natural character, and outstanding landscape areas and features is</i> 	Ravensdown considers that a region wide assessment will promote better outcomes and reduce inconsistencies between districts.

			<p>carried out; and</p> <ul style="list-style-type: none"> • a region wide assessment of significant indigenous vegetation and habitats of significant indigenous fauna is carried out. <p>These assessments could be carried out by the Regional Council, or as a collaborative effort between territorial authorities and the Regional Council.</p>	
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248 Appendices – general

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Forest and Bird NZ	98	Oppose	<p><i>New Schedule:</i> <i>"Schedule XX Biodiversity Offsetting</i> <i>The following sets out a framework for the use of biodiversity offsets. It should be read in conjunction with the NZ government Guidance on Good Practice Biodiversity Offsetting in New Zealand August 2014 (or any successor document):</i> <i>1. Restoration, enhancement and protection actions will only be considered a biodiversity offset where they are used to offset the anticipated residual effects of activities after appropriate avoidance, minimisation, remediation and mitigation actions have occurred as per the policies in Policies 2.1.6, 2.2.2 and 4.5.7. Biodiversity offsetting should not be applied to justify impacts on vulnerable and irreplaceable biodiversity values or biodiversity values which cannot be offset.</i> <i>2. Restoration, enhancement and protection actions undertaken as a biodiversity offset are demonstrably additional to what otherwise would occur, including that they are additional to any remediation or mitigation undertaken in relation to the adverse effects of the activity.</i></p>	As stated above Ravensdown agrees that where offsetting is used, it should be approached in a structured way. While the RPS should not <i>preclude</i> the use of this technique it should not be <i>required</i> , and the approach to offsetting must not be specified.

		<p>3. Offset actions should be undertaken close to the location of development, where this will result in the best ecological outcome.</p> <p>4. The values to be lost through the activity to which the offset applies are counterbalanced by the proposed offsetting activity which is at least commensurate with the adverse effects on indigenous biodiversity, so that the overall result is no net loss, and preferably a net gain in ecological values.</p> <p>5. The offset is applied so that the ecological values being achieved through the offset are the same or similar to those being lost.</p> <p>6. The positive ecological outcomes of the offset last at least as long as the impact of the activity, and preferably in perpetuity. Adaptive management responses should be incorporated into the design of the offset, as required to ensure that the positive ecological outcomes are maintained over time.</p> <p>7. The biodiversity offset should be designed and implemented in a landscape context- i.e. with an understanding of both the donor and recipient sites role, or potential role in the ecological context of the area.</p> <p>8. The protection and restoration actions undertaken as a biodiversity offset are delivered or demonstrated prior to the adverse effects occurring.</p> <p>9. The consent application identifies the intention to utilise an offset, and includes a biodiversity offset management plan that:</p> <p>i. sets out baseline information on all indigenous biodiversity) that are potentially impacted by the proposal at both the donor and recipient sites:</p> <p>A. Originally rare ecosystem types (Williams et al. 2007);</p> <p>B. Indigenous vegetation on wetlands and sand dunes;</p> <p>C. Indigenous vegetation types;</p> <p>D. Important fauna habitats;</p> <p>E. Threatened, At Risk, and locally uncommon species; and</p> <p>F. Indigenous vertebrate fauna guilds, including each trophic level (herbivore, predator), feeding guilds of</p>	
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			<p>avifauna (insectivore, frugivore, nectivore, carnivore), and indigenous fish.</p> <p>ii. includes clear objectives and performance criteria which demonstrates how the requirements set out in this appendix will be addressed,</p> <p>iii. identifies the monitoring approach that will be used to demonstrate how the matters set out in this appendix have been addressed, over an appropriate timeframe.</p> <p>(While this appendix sets out a framework for the use of biodiversity offsets in Otago, many of the concepts are also applicable to compensation actions i.e. where an overall outcome of no net loss (and preferably a net gain) in biodiversity values cannot be ensured through proposed restoration and protection actions."</p>	
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249 Glossary

Submitter	Submission number #	Support/ Oppose	Part of relief sought by submitter supported / opposed	Reasons for this further submission
Meridian Energy Limited	82	Support	<p>• Add the following definitions to the Glossary:</p> <p>" Offsetting - measureable outcomes resulting from actions designed to counter residual adverse effects of subdivision, use and development on indigenous biodiversity, which cannot otherwise be avoided, remedied, or mitigated. "</p> <p>" Environmental Compensation - measureable outcomes resulting from voluntary actions designed to provide new positive effects to counter residual adverse effects of subdivision, use and development on indigenous biodiversity, which cannot be otherwise avoided, remedied, mitigated, or offset. "</p>	Ravensdown supports the inclusion of these definitions. Placement of definitions will remove any ambiguities that may arise from parties using different definitions in future resource consenting scenarios.

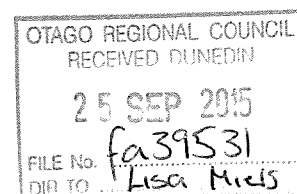
Fonterra Co-Operative Ltd	99	Support	<p><i>Include the following definition:</i> <i>"Regionally significant industry</i> <i>An economic activity based on the use</i> <i>of natural and physical resources in</i> <i>the region and is identified in regional</i> <i>or district plans, which has been</i> <i>shown to have benefits that are</i> <i>significant at a regional or national</i> <i>scale."</i></p>	<p>Strictly speaking this definition is not necessary because an industry is regionally significant once it is identified as such in the regional plan or district plan. However, if a definition is inserted into the RPS Ravensdown supports the inclusion of this definition over other suggested definitions.</p>
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Form 3

**FURTHER SUBMISSIONS ON THE PROPOSED REGIONAL
POLICY STATEMENT FOR OTAGO**

Clause 8 of Schedule 1, Resource Management Act 1991

TO: FREEPOST ORC 497
OTAGO REGIONAL COUNCIL
PRIVATE BAG 1954
DUNEDIN 9054

**FOR OTAGO REGIONAL COUNCIL OFFICE USE ONLY**

Submission No:

Receipt Date:

TO: OTAGO REGIONAL COUNCIL

NAME: EGG PRODUCERS FEDERATION OF NEW ZEALAND ('EPFNZ')

1. These are further submissions in support of or opposition to a number of submissions on the Proposed Regional Policy Statement for Otago.
2. EPFNZ could not gain an advantage in trade competition through these submissions.
3. EPFNZ made an original submission on the PRPS
4. EPFNZ have an interest in the PRPS that is greater than the interests of the general public. EPFNZ is part of the poultry industry which is a large sector of New Zealand's primary production industry and it includes the production of both poultry meat and eggs. There are currently 18 poultry operations in the Otago Region which includes the following:
 - 14 layer farms;
 - 1 rearer farm; and
 - 3 feedmills.
5. The further submissions are contained in Table 1 on the attached sheet.
6. EPFNZ wish to be heard in support of their submissions.
7. If others make a similar submission, EPFNZ will consider presenting a joint case with them at the hearing.

SUBMITTER DETAILS

Date: 23 September 2015

Signed:

1035

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Attention: Reina Kumar

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TABLE 1: EPFNFZ Further Submission

PROVISION	SUBMITTER	SUBMISSION REF	SUMMARY OF RELIEF REQUESTED IN ORIGINAL SUBMISSION	SUPPORT/OPOSE	REASONS/RELIEF SOUGHT
249 - Glossary	Rayonier Matariki Forests Limited	84	Add a definition of 'primary production', e.g. " <u>Activities that involve the production of primary products such as those from farming, poultry farming, horticulture, or plantation forestry activities, and which have a functional need for a rural location</u> ."	Support	EPFNFZ supports the inclusion of this definition as the term 'primary production' is used throughout the PRPS and should be defined to clarify what activities fall into that category. EPFNFZ supports this definition as it acknowledges that poultry farming is a primary production activity.
249 - Glossary	AgResearch Ltd	116	Include a definition for 'rural production activities' as follows: <u>"Rural land use activities that rely on the productive capacity of land or have a functional need for a rural location such as agriculture, pastoral farming, dairying, poultry farming, pig farming, horticulture, forestry, quarrying and mining. Also included in this definition are processing and research facilities that directly service or support those rural land use activities."</u>	Support	EPFNFZ supports the inclusion of a definition of a 'rural production activity' as it recognises that poultry farming relies on the productive function of rural land to operate. It also recognises that poultry farming needs to be located in a rural environment which is important as it generates odour and dust effects which are appropriate for a rural environment.
31 – Policy 2.1.1 – Managing for Freshwater Values	The Southern District Health Board	51	Supports with following amendment to 2.1.1 (i): <u>Retain the quality and reliability of existing drinking water supplies, supply sources, improve catchment and groundwater quality in areas where there is likely demand for sources in future.</u>	Support in part	EPFNFZ supports the amendment of this policy as it specifies additional sources of freshwater supply. However, it does not specify who drinking water is for. As per EPFNFZ's original submission, it is requested that stock drinking water is provided for as stated in Section 14(3)(b)(i) of the RMA.
31 – Policy 2.1.1 – Managing for Freshwater Values	Environmental Defence Society Incorporated	127	Clause (i) is supported.	Support in part	EPFNFZ supports this policy as it provides for the take and use of water for domestic needs as per Section 14(3)(b)(i). However, EPFNFZ consider that their justification is too narrow as it only focus on one sub-clause of the RMA which provides drinking water for humans. EPFNFZ consider that stock drinking water also need to be provided for as stated in Section 14(3)(b)(ii) of the RMA.
34 Policy 2.1.4 – Managing for Air Quality	Ponterra Co-operative Group Limited	99	Delete Policy 2.1.4 clause c) or identify the specific values and their associated criteria or thresholds that are to be attained or protected.	Oppose	EPFNFZ opposes the deletion of this policy as they consider that amenity values need to be identified as different activities and environments have different levels of amenity. Rural production activities, such as, poultry farming have the ability to generate air discharge effects such as odour and dust, which are generally acceptable and appropriate in a rural environment. Amenity values in a rural environment are different to those anticipated in a residential environment. EPFNFZ request that rural amenity values be recognised.
35 Policy – 2.1.5 – Managing for Soil values	NZ Pork Industry Board	83	Include a policy protecting productive soils from fragmentation or inappropriate use by activities that do not have a functional need to be located in the rural environment.	Support in part	EPFNFZ supports the inclusion of a policy which protects productive soils from the fragmentation and inappropriate use as rural production activities need to be located in the rural environment. EPFNFZ support the inclusion of this policy as it recognises that there are activities such as industrial or subdivision/ land fragmentation activities that do not have a functional need to be located in a rural environment. However, EPFNFZ consider the reference to productive soil is changed to productive land as it will protect the entire parcel which encompasses the soil structure, topography and climate amongst other factors.
35 Policy – 2.1.5 – Managing for Soil values	Federated Farmers of New Zealand	115	Delete proposed Policy 2.1.5 (i).	Oppose in part	EPFNFZ oppose the deletion of this policy as there will be no policy to protect soil resources for primary production which may lead to its unsustainable management. EPFNFZ consider that this policy is retained and consider that the policy is amended to 'land' as it will protect the entire land parcel, which includes soil.
56 Policy 2.2.14 – Identifying	Alliance Group Limited	56	Delete this policy.	Oppose in part	EPFNFZ oppose the deletion of Policy 2.2.14 as there will no longer be a criteria which identifies highly versatile soil and may potentially lead to its unsustainable management. EPFNFZ request that this policy is retained and that the references to 'soil' should be replaced with 'land' as it will protect the entire land parcel which includes

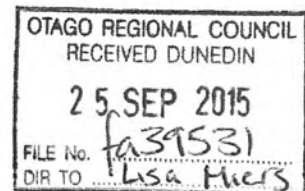
TABLE 1: EPFNZ Further Submission

PROVISION	SUBMITTER	SUBMISSION REF	SUMMARY OF RELIEF REQUESTED IN ORIGINAL SUBMISSION	SUPPORT/OPPOSE	REASONS/RELIEF SOUGHT
Highly Valued Soil Resources					soil. Poultry farming and other rural production activities rely on the productive land which includes characteristics such as well-drained, flat land and soil as part of its day to day operation.
57 Policy 2.2.15 – Protect the Values of Highly Valued Soil Resources	Alliance Group Limited	56	Delete this policy	Oppose in part	EPFNZ opposes the deletion of Policy 2.2.15 there will be no policy which protects highly valued soil as a resource which may potentially result in its unsustainable management and threaten activities which rely on this resource. Poultry farming and other rural production activities rely on productive land which includes characteristics such as well drained, flat land and soil as part of its day to day operation. EPFNZ request that this policy is retained and that the references to 'soil' should be replaced with 'land.'
57 Policy 2.2.15 – Protect the Values of Highly Valued Soil Resources	Fonterra Co-operative Group Limited	99	Replace clause d) and include additional provisions as follows: <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>	Support in part	EPFNZ support the relief sought as urban expansion is appropriate in these areas. However, EPFNZ request that the emphasis shift from protecting highly valued rural soils, to protecting highly valued rural land. This will provide for the overall land resource and land parcel which contains highly valued soils and other characteristics which make it suitable for rural and primary production activities. Therefore, EPFNZ seek the following amendment to the submitter's relief: d) Avoiding the use of highly valued soils land for urban expansion unless no alternative with lower value soils is available. e) Ensuring that land use activities on highly soils valued land are consistent with the continued use of such soils for primary production purposes.
155 Policy 4.3.1	Rayonier Matariki Forests Limited	84	Amend a) as follows. Enabling farming and other rural <u>primary production</u> activities that support the rural economy.	Support	EPFNZ support this amendment as it specifies the type of rural activity that will be enabled under this policy. Poultry farming is a primary production activity which contributes to the rural economy. EPFNZ note that this submission also requests a definition of primary production activities, as it is referred through the PRFS but is not defined in the plan. EPFNZ also support this relief sought as it poultry farming is a legitimate primary production activity.

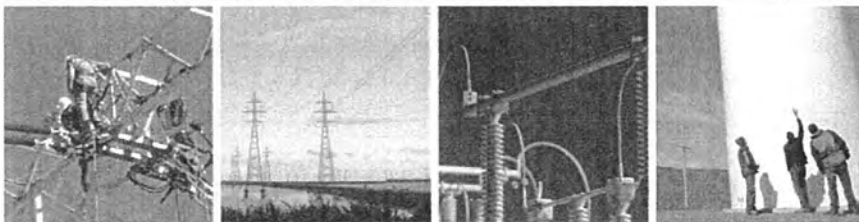
Further Submission by Transpower New Zealand Limited

Proposed Otago Regional Policy Statement

25 September 2015



Keeping the energy flowing



TRANSPOWER



Further submission by Transpower New Zealand Ltd on the Proposed Otago Regional Policy Statement

To Otago Regional Council (the Council)

Name: Transpower New Zealand Limited (Transpower)

This is a further submission in support of, and in opposition to, a number of submissions on the Proposed Otago Regional Policy Statement (PRPS).

Transpower is making this further submission (refer attached table) in accordance with Clause 6 of Schedule 1, Resource Management Act 1991.

- Transpower wishes to be heard in support of its further submissions; and
- Transpower would not be prepared to present a joint case with others making a similar submission due to the specific interests of Transpower as the owner and operator of the National Grid.

Transpower has an interest in the PRPS that is greater than the interest that the general public has, for reasons including the following:

- Transpower has an interest as a landowner and occupier in respect of existing and future infrastructure which is potentially affected (directly or indirectly) by the relevant submissions; and
- In respect of many submissions, Transpower made an original submission on matters raised or affected by those submissions.

Transpower's further submission

Transpower's support of, or opposition to, a particular submission including the reasons for Transpower's support or opposition and the relief sought are identified in the detailed table included in Schedule 1 (attached). The general reasons for Transpower's further submission are set out below. These reasons apply in respect of the each submission identified in Schedule 1 and are also supplemented by the more specific reasons and relief in Schedule 1.

General reasons in respect of submissions supported by Transpower

Transport is supportive of the submissions identified in Schedule 1 to the extent they are generally consistent with the outcomes sought in its original submissions, including:

- Giving effect to the National Policy Statement on Electricity Transmission 2008 (NPSET);
- Being consistent with, and/or promoting the outcomes sought by, the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (NESETA);
- Enabling people and communications to provide for their social, economic, and cultural well-being and for their health and safety;
- Recognising the National Grid as a physical resource of national importance and the need to enable its safe, effective and efficient operation, maintenance, upgrade and development; and
- Enabling the protection of Transpower's infrastructure and operations in the Otago region;

Transpower seeks that the submissions it supports be allowed to the extent that they achieve the matters set out above or such further alternative relief or amendments as may be necessary to achieve those matters.

General reasons and decisions sought in respect of submissions opposed by Transpower

Transpower opposes the submissions identified in Schedule 1 to the extent they are generally inconsistent with, and fail to achieve, the outcomes sought in its original submissions

Transpower seeks that the submissions it opposes be disallowed to the extent that they fail to achieve the matters set out above or such further alternative relief or amendments as may be necessary to achieve those matters.

Transpower wishes to be heard in support of its further submission.

Due to the specific interests of Transpower in the context of the National Grid, Transpower will not consider presenting a joint case with others at a hearing.

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Mobile:	+64 27 702 5408
Email:	aileen.craw@beca.com
Contact person:	Aileen Crow, Senior Planner



.....
**Signature of the person authorised to sign
on behalf of Transpower New Zealand Limited**

Date: 25 September 2015

Schedule 1: Transpower New Zealand Limited – Further Submission

Submitter	PRPS Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
Part A - Introduction				
Dunedin City Council (156.255)	DCC seek that the PRPS provides further guidance on where an RPS sits within the wider planning framework and hierarchy.	Support	Transpower supports this submission, particularly in relation to the NPSET and NESETA. As per Transpower's original submission, the PRPS needs to provide appropriate recognition of the NPSET in the hierarchy of RMA documents and the role it plays in establishing national policy. The PRPS also needs to provide direction to territorial authorities to consider and give effect to the NPSET and NESETA.	Allow, and accept Transpower's original submission to recognise the NPSET and NESETA within the PRPS.
Part B, Chapter 2 – Otago has high quality natural resources and ecosystems				
Contact Energy Limited (74.32)	<p>Policy 2.1.2 – Managing for the values of beds of rivers and lakes, wetlands, and their margins</p> <p>Contact Energy seeks the policy be amended to provide an additional clause as follows:</p> <p><i>"Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to:</i></p> <p>...</p> <p><i>m) <u>Maintain the ability of existing infrastructure to operate within their design parameters.</u></i>"</p>	Support in part	<p>Transpower supports the intent of this submission as it aims to maintain the ability of existing infrastructure to operate within its design parameters whilst managing effects on surface water bodies.</p> <p>However, Transpower considers that the proposed clause should be amended to give effect to Policy 5 of the NPSET, which states that "decision-makers must enable the reasonable operational, maintenance and minor upgrade requirements of established electricity transmission assets."</p>	<p>Allow, but amend the relief sought to be consistent with Transpower's relief sought in relation to Policy 2.1.1 (in its original submission) as follows:</p> <p><i>m) Maintain the ability <u>Enable the reasonable operational, maintenance and minor upgrade requirements of existing infrastructure to operate within their design parameters.</u></i>"</p>

Submitter	PRPS Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
<p>Alliance Group Limited (56.33)</p> <p>PowerNet Limited (60.33)</p>	<p>Policy 2.1.3 – Managing for coastal water values</p> <p>Alliance and PowerNet seeks the same relief in that that the policy be amended to state that Kai Tahu values should be provided for, rather than protected, and to include the following additional clause:</p> <p><u><i>"j) Maintain the ability to use coastal water for infrastructure and by those providing for the economic, health and safety and social wellbeing of the community."</i></u></p>	Support in part	<p>Council must recognise that some developments or use, such as regionally or nationally significant infrastructure, have to be located in specific areas. These areas may include sites important to Kai Tahu and may also include unavoidable adverse effects on values of significance to Kai Tahu. Allowance should therefore be made within this policy that Kai Tahu values are provided for, rather than protected, as this may be unnecessarily restrictive for appropriate developments and use, especially where there may be locational and operational needs and constraints.</p> <p>Transpower supports the additional clause proposed by the submitters as it aims to maintain coastal water in a sustainable way to ensure it meets people and community's needs now and in the future, including infrastructure needs.</p>	Allow
<p>Alliance Group Limited (56.35)</p> <p>PowerNet Limited (60.35)</p>	<p>Policy 2.1.5 – Managing for soil values</p> <p>Alliance and PowerNet seek that the policy be amended to state that Kai Tahu values should be provided for, rather than protected, and to include the following additional clause:</p> <p><u><i>"m) Maintain the ability to use soils for infrastructure and by those providing for the economic, health and safety and social wellbeing of the community."</i></u></p>	Support in part	<p>Council must recognise that some developments or use, such as regionally or nationally significant infrastructure, have to be located in specific areas. These areas may include sites important to Kai Tahu and may also include unavoidable adverse effects on values of significance to Kai Tahu. Allowance should therefore be made within this policy that Kai Tahu values are provided for, rather than protected, as this may be unnecessarily restrictive for appropriate developments and use, especially where there may be locational, functional and / or operational needs and constraints.</p> <p>Transpower supports the additional clause proposed by the submitters as it aims to maintain the ability of soils to be used for infrastructure purposes in the future.</p>	Allow

Submitter	PRPS Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
Alliance Group Limited (56.40) PowerNet Limited (60.40) Trustpower Limited (85.40)	<p>Objective 2.2 – Otago’s significant and highly valued natural resources</p> <p>Alliance, PowerNet and Trustpower seek that the objective be amended as follows:</p> <p><i>“Otago’s significant and highly-valued natural resources are identified, and protected or enhanced from inappropriate use or development.”</i></p>	Support in part	<p>Transpower supports the amendment as it recognises that some developments or use, such as regionally or nationally significant infrastructure, have to be located in specific areas. The resources should therefore only be protected from inappropriate use and development. In addition, the alteration would be consistent with Objectives 3.5 and 3.6, and Policies 3.5.1-3.5.3 and 3.6.4 that recognises and provides for regionally and nationally significance infrastructure, both now and in the future.</p> <p>The amendment will also give effect to the NPSET.</p>	Allow
Alliance Group Limited (56.44) PowerNet Limited (60.44)	<p>Policy 2.2.2 – Managing significant indigenous vegetation and significant habitats of indigenous fauna</p> <p>Alliance and PowerNet seek that the policy be amended as follows:</p> <p><i>“Protect and where appropriate enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by:</i></p> <p><i>a) Avoiding where practicable adverse effects on those values which contribute to the area or habitat being significant; and</i></p> <p><i>...”</i></p>	Support in part	<p>Transpower agrees that the policy should be amended to reflect that the “protection” of significant indigenous vegetation and habitats of significant fauna can also be achieved via appropriate mitigation and / or offset strategies.</p> <p>The amendments also acknowledge that some activities, such as a new electricity substation or line, have a functional, operational and / or locational need to be located in particular areas where adverse effects are unavoidable.</p>	Allow
Alliance Group Limited (56.49) PowerNet Limited (60.49)	<p>Policy 2.2.7 – Identifying the landward extent of the coastal environment</p> <p>Alliance and PowerNet seek the same relief in that the policy be amended to be consistent with Policy 1 of the New Zealand Coastal Policy Statement by providing a map which identifies the extent of the coastal environment in Otago.</p>	Support in part	<p>Transpower agrees that the PRPS should be consistent with Policy 1 of the NZCPS and thus provide direction on how coastal areas are defined and identified.</p>	Allow

Submitter	PRPS Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
Aurora Energy Limited (76.49)	<p>Policy 2.2.7 – Identifying the landward extent of the coastal environment</p> <p>Aurora seeks that a map be included which identifies regionally significant infrastructure such as the electricity distribution network.</p>	Support in part	<p>Transpower accepts that the National Grid is considered both regionally and nationally significant infrastructure and thus Aurora's submission point would include identifying the National Grid on a map within the PRPS.</p> <p>However, as per Transpower's original submission, Transpower considers that an additional method should be included within the PRPS which directs territorial authorities to identify the National Grid on planning maps. This would be consistent with Policy 12 of the NPSET.</p>	Allow , and accept Transpower's original submission to provide an additional method to direct territorial authorities to identify the National Grid on planning maps

Part B, Chapter 3 – Communities in Otago are resilient, safe and healthy

New Zealand Transport Agency (78.285)	<p>Introduction to Objective 3.4</p> <p>NZTA seeks the introduction be amended as follows:</p> <p><i>"Some infrastructure is provided by local authorities (such as water supply, waste water and stormwater), <u>some is provided by Requiring Authorities</u> while others are managed by private companies."</i></p>	Support	As currently worded, the introduction to Objective 3.4 states that only local authorities and private companies provide infrastructure to the local community. However, there are several state-owned enterprises, such as Transpower, which also provide infrastructure to the Otago region.	Allow
Aurora Energy Limited (76.285)	<p>Introduction to Objective 3.4</p> <p>Aurora seeks that the introduction to Objective 3.4 be amended as follows:</p> <p><i>"<u>Local authorities and providers of Regionally Significant Infrastructure</u> have a role to play, to ensure that the local and regional infrastructure needs are being met."</i></p>	Support in part	Transpower supports the intention of the submission in that infrastructure providers as well as local authorities have a significant role to play in terms of infrastructure requirements being met, but seeks it also include nationally significant infrastructure to reduce any confusion. Transpower also seek their original submission on Objective 3.4 be included.	<p>Allow, but amend as follows and accept Transpower's original submission on Objective 3.4:</p> <p><i>"<u>Local authorities and providers of Regionally and Nationally Significant Infrastructure</u> providers have a role to play, to ensure that the local and regional <u>and national</u> infrastructure needs are being met."</i></p>

Submitter	PRPS Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
Federated Farmers (115.98)	<p>Policy 3.4.1 – Integrating infrastructure with land use</p> <p>Federated Farmers seek the policy be amended to include the following clause:</p> <p><i>"Achieve the strategic integration of infrastructure with land use, by:</i> <i>b) Designing infrastructure to take into account:</i></p> <p>vii. <u>The effects on existing land use and land users; and ..."</u></p>	Support in part	<p>For any new development or major upgrades of the National Grid, Transpower always seeks to avoid, remedy or mitigate effects on existing lawful activities, as far as practicable, through the route, site and method selected (ACRE model).</p> <p>Transpower therefore considers the submission to be reasonable but request the wording be amended to be consistent with Policy 4 of the NPSET by specifying "new" infrastructure.</p>	<p>Allow, but amend as follows and accept Transpower's original submission on Policy 3.4.1:</p> <p><i>"Achieve the strategic integration of infrastructure with land use, by:</i> <i>b) Designing <u>new</u> infrastructure to take into account:</i></p> <p><u>The effects on existing land use and land users; and ..."</u></p>
Aurora Energy Limited (76.99)	<p>Policy 3.4.2 – Managing infrastructure activities</p> <p>Aurora seeks the policy be amended to specify <u>"managing regionally significant and critical infrastructure activities to: ..."</u>.</p> <p>Aurora also seeks inclusion of the following clause:</p> <p><u>"h. Restricting the establishment of those activities that may result in reverse sensitivity effects."</u></p>	Support in part	<p>Transpower accepts that the National Grid is considered both regionally and nationally significant infrastructure and thus Aurora's submission point would include the National Grid as 'regionally significant infrastructure'. However, as the term 'nationally and regionally significant infrastructure' has been used throughout the PRPS, particularly in Objective 3.5 and Policies 3.5.1-3.5.3, Transpower seeks that if Aurora's submission point is accepted, the terminology should remain consistent throughout the entire PRPS and thus the words 'nationally and regionally significant infrastructure' should be used. Alternating between the two phrases will confuse users of the PRPS. In addition, the term 'critical infrastructure' is not a term currently used or defined within the PRPS and therefore may confuse users.</p> <p>Transpower supports Aurora's submission point to restrict the establishment of activities which may result in reverse sensitivity effects. However, Transpower considers that its original submission and proposed wording is more appropriate in this instance and thus seeks that its original submission on Policy 3.4.2 be accepted. If Aurora's submission is accepted, Transpower seeks the wording be amended to identify adverse effects, including reverse sensitivity effects.</p>	<p>Allow the following amended version, and accept Transpower's original submission on Policy 3.4.2:</p> <p><u>"Managing nationally and regionally significant and critical infrastructure activities, to:</u> ... If Aurora's second submission point is accepted, allow the wording to the following: <u>h. Restricting the establishment of those activities that may result in adverse effects, including reverse sensitivity effects."</u></p>

Submitter	PRPS Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga (154.99)	<p>Policy 3.4.2 – Managing infrastructure activities</p> <p>The submitter seeks the policy be reworded to include managing infrastructure activities to:</p> <p><i>"maintain and enhance Kai Tahu values and sites of significance; reduce adverse effects ... including on mahinga kai; and support economic, social, cultural and community activities."</i></p>	Oppose in part	<p>Maintaining and developing infrastructure, such as the National Grid, to meet the social wellbeing of present and future generations may not necessarily result in the maintenance or enhancement of Kai Tahu values and sites of significance.</p> <p>Policy 3 of the NPSET states that when considering measures to avoid, remedy or mitigate adverse environmental effects of transmission activities, decision-makers must consider the constraints imposed on achieving those measures by the technical and operational requirements of the network. Transpower endeavours to avoid, remedy or mitigate adverse effects on sites of cultural, but this may not always be practicable due to the locational, technical or operational requirements of the National Grid.</p>	Disallow, and accept Transpower's original submission on Policy 3.4.2
KiwiRail Holdings Limited (69.100)	<p>Policy 3.4.3 – Designing lifeline utilities and facilities for essential or emergency services</p> <p>KiwiRail seeks the policy be amended to include the upgrading and maintenance of lifelines utilities and essential / emergency services, not just the designing.</p>	Support	Transpower agrees that the upgrading and maintenance of lifeline utilities, such as the National Grid, is just as important as designing the utilities.	Allow
PowerNet Limited (60.102)	<p>Objective 3.5 – Infrastructure of national and regional significance is managed in a sustainable way</p> <p>PowerNet seeks the objective be altered as follows:</p> <p><i>"Infrastructure of national and regional significance is managed in a sustainable way. The development, use, operation and maintenance of infrastructure of national and regional significance is recognised and provided for."</i></p>	Support	<p>Infrastructure of national and regional significance must not only be managed sustainably but it must also be developed, used and operated in a sustainable way if it is to meet and contribute to the economic, social and cultural wellbeing of the region and nation.</p> <p>The proposed amendment would ensure the Objective is consistent with Policy 1 of the NPSET.</p>	Allow

Submitter	PRPS Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
Aurora Energy Limited (76.286)	<p>Introduction to Objective 3.5</p> <p>Aurora seeks that the introduction be amended as follows:</p> <p><i>"Infrastructure of national and regional significance, including roads, rail, electricity generation, and transmission and distribution, and telecommunications networks, are part of a national network, and contribute to the economic and social wellbeing of the nation."</i></p>	Neutral	<p>Transpower accepts that the local electricity distribution network is infrastructure of regional significance. However, Transpower noted in its original submission that there can be confusion between the electricity transmission network (the National Grid) and the electricity distribution network.</p> <p>For this reason, Transpower is neutral to the inclusion of the distribution network in the introduction section of Objective 3.5 but seeks Council make a very clear distinction between the three stages of electricity (generation, transmission and distribution) so users are not confused.</p>	No relief sought
Horticulture New Zealand (124.104)	<p>Policy 3.5.1 – Recognising national and regional significance of infrastructure</p> <p>Horticulture NZ seek the policy be amended to state 'The National Grid' rather than 'electricity transmission infrastructure'.</p>	Support	<p>As per Transpower's original submission on Policy 3.5.1, it is unclear from the objective whether 'electricity transmission infrastructure' relates to Transpower's National Grid, or if it includes the electricity distribution network operated by located distribution companies, or if it also includes transmission lines owned and operated by electricity generation companies.</p> <p>For this reason, Transpower supports Horticulture NZ in amending the policy to "the National Grid" as this is consistent with the NPSET which states that the national benefits of the transmission network should not be confused with other regionally significant infrastructure (i.e. the distribution network.).</p>	Allow, as per Transpower's original submission on Policy 3.5.1

Submitter	PRPS Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
Aurora Energy Limited (76.104)	<p>Policy 3.5.1 – Recognising national and regional significance of infrastructure</p> <p>Aurora seeks this policy be altered as follows:</p> <p><i>"Recognise the national and regional significance of the following infrastructure:</i></p> <p>....</p> <p><i>b)Electricity transmission and distribution infrastructure;"</i></p>	Oppose in part	<p>As per Transpower's original submission on Policy 3.5.1, it is unclear from the objective whether 'electricity transmission infrastructure' relates to Transpower's National Grid, or if it includes the electricity distribution network operated by located distribution companies, or if it also includes transmission lines owned and operated by electricity generation companies.</p> <p>For this reason, Transpower seeks its original submission be accepted by amending the policy to state "the National Grid". This is also consistent with the NPSET which states that the national benefits of the transmission network should not be confused with other regionally significant infrastructure (i.e. the distribution network.).</p> <p>If the electricity distribution network is added to Policy 3.5.1, Transpower seek that it is added as a separate bullet point to avoid confusion. It is noted that electricity generation facilities is a separate bullet point under a) and thus all three stages of electricity should be covered separately.</p>	Disallow , and accept Transpower's original submission on Policy 3.5.1
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga (154.106)	<p>Policy 3.5.3 – Protecting infrastructure of national or regional significance</p> <p>The submitter seeks to include a provision that the cultural values of land will be taken into account throughout this policy.</p>	Oppose in part	<p>Transpower acknowledges that cultural values of land must be taken into account, but does not consider that Policy 3.5.3 is the appropriate provision for this to be inserted. The aim of this policy is to provide protection for regionally and nationally significant infrastructure, particularly from reverse sensitivity effects.</p> <p>Policy 3.5.2 relates to managing adverse effects of infrastructure and that provision is a more appropriate place to take into account cultural values of land, rather than Policy 3.5.3.</p>	Disallow , and accept Transpower's original submission on Policy 3.5.3

Submitter	PRPS Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
Dunedin City Council (156.106)	<p>Policy 3.5.3 – Protecting infrastructure of national or regional significance</p> <p>DCC seek the policy is amended to "<i>recognise and protect ...</i>" as this is a more streamlined approach.</p>	Support	Transpower agrees that infrastructure of national or regional significance should not only be protected, but also recognised. This is consistent with the NPSET, in particular Policy 2, which states that decision makers must recognise and provide for the effective operation, maintenance, upgrading and development of the National Grid.	Allow
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga (154.107)	<p>Objective 3.6 – Energy supplies to Otago's communities are secure and sustainable</p> <p>The submitter seeks the explanation of the objective be amended to include a description that energy generation and transmission must still avoid adverse effects on environmental and cultural values.</p>	Oppose in part	<p>The word "avoid" should be used carefully due to the recent Supreme Court decision on the King Salmon Case. In that case, the Court stated that the word "avoid" means "not allowing" or "preventing the occurrence of".</p> <p>Transpower acknowledges that the National Grid shall seek to avoid adverse effects, where practicable, otherwise effects should be remedied or mitigated as per the RMA. This is also acknowledged in Policy 3 of the NPSET, which states that when considering measures to avoid, remedy or mitigate adverse environmental effects of transmission activities, decision-makers must consider the constraints imposed on achieving those measures by the technical and operational requirements of the network. In addition, Policy 4 of the NPSET directs decision-makers to have regard to the extent to which any adverse effects have been avoided, remedied or mitigated by the route, site and method selection.</p> <p>The policy therefore needs to acknowledge that the National Grid and associated activities may need to be located in particular areas with unavoidable adverse effects.</p>	Disallow

Submitter	PRPS Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
Federated Farmers (115.113)	<p>Policy 3.6.5 – Protecting electricity distribution infrastructure</p> <p>Federated Farmers seeks the policy be altered to refer to the 'electricity transmission activities' rather than 'electricity distribution activities'.</p> <p>The submitter states that the PRPS needs to clarify the difference between electricity transmission and electricity distribution activities.</p>	Support in part	<p>Transpower agrees with the submitter that the PRPS needs to clarify the difference between the National Grid (the electricity transmission network) and the local electricity distribution network.</p> <p>As per Transpower's original submission, Council is required to provide protection of the National Grid under the NPSET. There is no requirement to identify and provide for the local electricity distribution network.</p>	Allow, but insert a new policy for protection of the National Grid as stated in Transpower's original submission
Alliance Group Limited (56.124)	<p>Policy 3.8.1 – Managing for urban growth</p> <p>Alliance seeks that the policy be amended by inserting the following clause:</p> <p><i><u>"Avoiding urban development which constrains the ability of regionally significant infrastructure or industry to be developed and used due to adverse effects relating to reverse sensitivity or safety; and "</u></i></p>	Support in part	<p>Transpower accepts that the National Grid is considered both regionally and nationally significant infrastructure and thus Alliance's submission point would include the National Grid as 'regionally significant infrastructure'.</p> <p>However, Transpower considers its original submission on Policy 3.8.1 has a similar purpose to Alliance's submission but contains wording that is more consistent with the NPSET. Transpower therefore seeks its original submission point be accepted, but if it is not, Transpower seeks Alliance's wording be altered to refer to 'nationally and regionally significant infrastructure' as this is a term that has been used throughout the PRPS, particularly in Objective 3.5 and Policies 3.5.1-3.5.3.</p>	<p>Accept Transpower's original submission point, but if not, allow Alliance's but amend as follows:</p> <p><i><u>"Avoiding urban development which constrains the ability of nationally and regionally significant infrastructure or industry to be developed and used due to adverse effects relating to reverse sensitivity or safety; and "</u></i></p>
Radio New Zealand Limited (57.127)	<p>Policy 3.8.3 – Managing fragmentation of rural land</p> <p>Radio NZ seeks an additional clause be added to the policy as follows:</p> <p><i><u>"e) Avoid the potential for reverse sensitivity effects on established activities."</u></i></p>	Support in part	<p>Transpower agrees that the policy needs to make specific reference to avoiding reverse sensitivity effects on established activities, but this should be limited to nationally and regionally significant infrastructure such as the National Grid. New activities such as farming or horticulture development can have reverse sensitivity effects on the National Grid.</p> <p>Transpower seeks the additional clause be restricted to regionally and nationally significant infrastructure, which would be consistent with the NPSET in providing protection of the National Grid from reverse sensitivity effects.</p>	<p>Allow, but amend as follows:</p> <p><i><u>"e) Avoid the potential for adverse effects, including reverse sensitivity effects, on nationally and regionally significant infrastructure established activities."</u></i></p>

Submitter	PRPS Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
PowerNet Limited (60.134)	<p>Policy 3.9.5 – Avoiding the creation of new contaminated land</p> <p>PowerNet seek the policy be deleted as it is not clear what implications the policy may have on development throughout the region.</p>	Support	Transpower agrees that the policy, as currently worded, is ambiguous and it is uncertain what the implications may be for development throughout the region. This is particularly important for Transpower as electricity transmission substations contain hazardous substances and may subsequently create new contaminated land.	Allow

Part B, Chapter 4 – People are able to use and enjoy Otago's natural and built environment

Aurora Energy Limited (76.146)	<p>Policy 4.1.1 – Maintaining and enhancing public access</p> <p>Aurora seek the policy include the following additional clause:</p> <p>"c) ...; or</p> <p><u>d) Avoid conflicts with existing uses and protect existing essential structures. "</u></p>	Support	Transpower supports this submission as it recognises that public access should be maintained and enhanced, where appropriate, but consideration must also be given to existing essential structures so there is no conflict or incompatible use, particularly in terms of ensuring the public's health and safety from say an electricity substation.	Allow
Aurora Energy Limited (76.155)	<p>Policy 4.3.1 – Managing for rural activities</p> <p>Aurora seeks the policy be amended as follows:</p> <p><i>"e. Providing for other activities that have a functional need to locate in rural areas, <u>including regionally significant infrastructure, tourism and recreational activities that are of a nature and scale compatible with rural activities.</u>"</i></p>	Support in part	<p>Transpower accepts that the National Grid is considered both regionally and nationally significant infrastructure and thus Aurora's submission point would include the National Grid as 'regionally significant infrastructure'.</p> <p>However, as the term 'nationally and regionally significant infrastructure' has been used throughout the PRPS, particularly in Objective 3.5 and Policies 3.5.1-3.5.3, Transpower considers that if Aurora's submission point is accepted, the terminology should remain consistent throughout the entire PRPS and thus the words 'nationally and regionally significant infrastructure' should be used. Alternating between the two phrases will confuse territorial authorities and users of the PRPS.</p> <p>The policy should also include nationally significant infrastructure such as the National Grid as this would be consistent with the NPSET.</p>	<p>Allow, but amend as follows:</p> <p><i>"e. Providing for other activities that have <u>an operational, technical and functional need to locate in rural areas, including nationally and regionally significant infrastructure, tourism and recreational activities that are of a nature and scale compatible with rural activities.</u>"</i></p>

Submitter	PRPS Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
Central Otago Environmental Society (59.174) (59.175)	<p>Policies 4.5.7 and 4.5.8 – Enabling offsetting of indigenous biodiversity</p> <p>The submitter seeks both these policies be deleted as offsetting is a crude tool and has a poor record in the Otago region.</p>	Support	Transpower supports the submitter in that offsetting should be dealt with in individual plans and consent applications. In addition, Policy 4.5.8 states that the offset should achieve no net loss and preferably a net gain in indigenous biodiversity values. However, it should allow for some effects and shouldn't necessarily equate to a no net loss. In addition, it should be recognised that offsetting doesn't strictly form part of the RMA.	Allow
Oceana Gold (New Zealand) Limited (140.175)	<p>Policy 4.5.8 – Offsetting for indigenous biodiversity</p> <p>The submitter seeks that the policy be deleted as it is poorly worded and confusing. Offsetting can be dealt within in plans and consent applications, if appropriate.</p>	Support	Transpower supports the submitter in that offsetting should be dealt with in individual plans and consent applications.	Allow

Submitter	PRPS Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
Part C - Implementation				
Aurora Energy Limited (76.193)	<p>Method 4.1 – Developing district plans Aurora seeks a new method be inserted as follows:</p> <p><u>"Method 4 - 4.1.13</u> <u>City or district plans will implement Policy 3.4.2 (e) and 3.5.3 by:</u> <u>i. identifying Regionally Significant and Critical Infrastructure corridors on the Planning maps; and</u> <u>ii. include provisions managing land use activities within these corridors to address potential reverse sensitivity effects."</u></p>	Oppose	<p>Transpower does not oppose the inclusion of a map which identifies regionally significant infrastructure, but Transpower is concerned that this would make it difficult for both territorial authorities and plan users to distinguish between the National Grid transmission lines, to which the NPSET and NESETA applies, and the local electricity distribution network. Territorial authorities are required to identify the electricity transmission network (the National Grid) on planning maps under Policy 12 of the NPSET, but there is no requirement for Councils to identify regionally significant infrastructure such as electricity distribution lines.</p> <p>In addition, it is unknown whether Aurora seek corridors for co-locating utilities, which presents technical issues. If Aurora seeks a corridor for the local distribution network, this is not provided for under the NPSET.</p> <p>Transpower seeks its original submission be allowed, which is to add an additional method within the PRPS to direct Territorial authorities to identify the National Grid transmission lines on planning maps.</p>	Disallow
Radio New Zealand Limited (57.238)	<p>AER 3.3 – Otago's infrastructure is safe, efficient and continues to operate through disruptive events Radio NZ seeks the following indicator be added to AER 3.3:</p> <p><u>"Lifeline utilities are protected from adverse effects, including from reverse sensitivity effects."</u></p>	Support	<p>Transpower supports the additional indicator as it provides protection for lifeline utilities, such as the National Grid, against reverse sensitivity effects. This is consistent with the NPSET.</p>	Allow

Submitter	PRPS Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
New Zealand Transport Agency (78.239)	<p>AER 3.4 – Adverse effects on highly-valued resource values from nationally and regionally significant infrastructure are avoided or mitigated</p> <p>NZTA seeks AER 3.4 be deleted as some infrastructure has locational requirements and it is not always possible to locate infrastructure outside of areas with outstanding and / or highly-valued resource values.</p>	Support	<p>As stated in Transpower's original submission on the PRPS, the word "avoid" should be carefully used due to the recent Supreme Court decision on the King Salmon Case. In that case, the Court stated that the word "avoid" means "not allowing" or "preventing the occurrence of".</p> <p>In this case, Council must recognise that a proposed activity may have a functional, operational and / or locational need to be located within a highly-valued resource area. Council should either add in "remedy" or delete the policy. This is consistent with Policy 3 of the NPSET which states that when considering measures to avoid, remedy or mitigate adverse environmental effects of transmission activities, decision-makers must consider the constraints imposed on achieving those measures by the technical and operational requirements of the network.</p>	Allow
Radio New Zealand Limited (57.241)	<p>AER 3.6 – Otago's urban areas are compact and maximise the use of existing services and infrastructure</p> <p>Radio NZ seeks that AER 3.6 be amended as follows:</p> <p><i>"New urban developments are well connected to existing urban areas, services, and infrastructure, while restricting the establishment of activities which give rise to the potential for reverse sensitivity effects."</i></p>	Support	<p>Transpower supports the additional wording to ensure that new activities do not create reverse sensitivity effects on existing infrastructure, such as the National Grid. This is consistent with Policy 10 of the NPSET which states decision-makers must to the extent reasonably possible, manage activities to avoid reverse sensitivity effects on the electricity transmission network.</p>	<p>Allow, but accept the following additional alteration:</p> <p><i>"New urban developments are well connected to existing urban areas, services, and infrastructure, while restricting the establishment of activities which give rise to the potential for adverse effects, including reverse sensitivity effects, on nationally or regionally significant infrastructure."</i></p>

Submitter	PRPS Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
Glossary				
Z Energy Limited, BP Oil NZ Limited and Mobil Oil NZ Limited (128.249)	<p>Definition for Infrastructure</p> <p>The submitter seeks that the definition for infrastructure be altered to have the same meaning as in section 2 of the RMA and suggests the following:</p> <p><u>"Infrastructure has the same meaning as in section 2 RMA and also means:</u></p> <p><u>a) Bulk storage for wholesale or distribution purposes of natural or manufactured gas over 15 tonnes, or petroleum over 1 million litres;</u></p> <p><u>b) Storage and treatment facilities for a water supply distribution system</u></p> <p><u>c) Storage, treatment and discharge facilities for a drainage of sewerage system</u></p> <p><u>d) Class 1 solid waste landfills;</u></p> <p><u>e) National defence facilities;</u></p> <p><u>f) Facilities for air quality and meteorological services."</u></p>	Oppose in part	<p>Transpower supports the submission in so far as the definition of infrastructure within the PRPS should be similar to the definition contained in section 2 of the RMA. However, Transpower opposes the proposed definition suggested by the submitter as it does not include the electricity transmission network (the National Grid). The electricity transmission network is included in section 2 of the RMA as well as the current definition proposed in the PRPS.</p> <p>Transpower seek the relief sought in its original submission in relation to the Infrastructure definition is accepted.</p>	Disallow, and accept Transpower's original submission on the definition of 'Infrastructure'.

Submitter	PRPS Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
Aurora Energy Limited (76,249)	<p>New definition for Critical infrastructure</p> <p><u>"Critical infrastructure: Infrastructure necessary to provide services which, if interrupted, would have a serious effect on the communities within the Region or a wider population, and which would require immediate reinstatement. This includes any structures that support, protect or form part of critical infrastructure. Critical infrastructure includes:</u></p> <ol style="list-style-type: none"> <u>1) regionally significant airports</u> <u>2) regionally significant ports</u> <u>3) gas storage and distribution facilities</u> <u>4) electricity substations, networks, and distribution installations, including the electricity distribution network</u> <u>5) supply and treatment of water for public supply</u> <u>6) storm water and sewage disposal systems</u> <u>7) telecommunications installations and networks</u> <u>8) strategic road and rail networks (as defined in the Regional Land Transport Strategy)</u> <u>9) petroleum storage and supply facilities</u> <u>10) public healthcare institutions including hospitals and medical centres</u> <u>11) fire stations, police stations, ambulance stations, emergency coordination facilities."</u> 	Oppose	<p>Transpower does not consider that an additional definition is required for critical infrastructure as the PRPS already includes definitions for 'essential services', 'emergency services' and 'lifeline utilities' as well as infrastructure.</p> <p>In addition, the proposed definition groups the electricity transmission and distribution networks together but has a separate point for renewable generation activities. The NPSET provides clear direction to Councils that the national benefits of the transmission network should not be confused with other regionally significant infrastructure (i.e. the distribution network.).</p>	Disallow

Submitter	PRPS Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
Aurora Energy Limited (76.249)	<p>New definition for Essential structures</p> <p><u>"Essential structures: Structures that support or form part of:</u></p> <p><u>(1) a maritime, road or rail transport network or service;</u></p> <p><u>(2) water supply, including irrigation infrastructure;</u></p> <p><u>(3) a telecommunications or radiocommunication network;</u></p> <p><u>(4) an energy generation, supply or transmission facility or distribution network;</u></p> <p><u>(5) a flood-protection work or facility;</u></p> <p><u>(6) water containment, flow or diversion infrastructure;</u></p> <p><u>(7) a water level or flow-measurement facility;</u></p> <p><u>(8) a drainage or sewerage system; or</u></p> <p><u>(9) the infrastructure forming parts of other network utilities.</u></p> <p><u>This includes any structures that support essential infrastructure."</u></p>	Oppose	Transpower does not support the inclusion of a definition of "essential structures" as this is a definition that would be provided within plans rather than the PRPS which is a high-level document. If a definition is to be provided, Transpower seeks a definition for 'support structure' as this is consistent with definitions included in the NESETA.	Disallow

Submitter	PRPS Provision Reference and Submission Summary	Support/ Oppose	Reason	Allow/Disallow
Aurora Energy Limited (76.249)	<p>New definition for Regionally significant infrastructure</p> <p><i><u>"Regionally significant infrastructure is:</u></i> <i><u>(1) Strategic land transport network and arterial roads</u></i> <i><u>(2) Dunedin Airport</u></i> <i><u>(3) Queenstown Airport</u></i> <i><u>(4) Commercial maritime facilities at Port Otago</u></i> <i><u>(5) Telecommunication facilities</u></i> <i><u>(6) National, regional and local renewable electricity generation activities of any scale</u></i> <i><u>(7) The electricity transmission and distribution networks</u></i> <i><u>(8) Sewage collection, treatment and disposal networks</u></i> <i><u>(9) Community land drainage infrastructure</u></i> <i><u>(10) Community potable water systems</u></i> <i><u>(11) Established community-scale irrigation and stockwater infrastructure</u></i> <i><u>(12) Transport hubs</u></i> <i><u>(13) Bulk fuel supply infrastructure including terminals, wharf lines and pipelines."</u></i></p>	Oppose	<p>Transpower does not support the inclusion of a definition for "regionally significant infrastructure" because the definition is not necessary; nationally and regionally significant infrastructure is defined under Policy 3.5.1. In addition, there is no definition for "nationally significant infrastructure".</p> <p>It is noted that the proposed definition groups the electricity transmission and distribution networks together but has a separate point for renewable generation activities. The NPSET provides clear direction to Councils that the national benefits of the National Grid should not be confused with other regionally significant infrastructure (i.e. the distribution network.).</p>	Disallow

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ORC Proposed Regional Policy Statement: Further Submissions

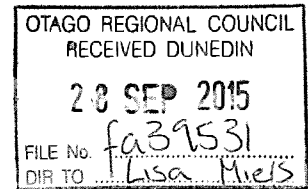
Further Submissions from: Terry Wilson (individual)

Address: Pine Hill Rd

Pine Hill

DUNEDIN

E-mail: tww@slingshot.co.nz



I do not wish to speak to my submission and will not be presenting it with others.

I have an interest in the proposal greater than the interest that the general public has.

My submission relates to this submitter (name)	I support/oppose this part sub/ref	My reasons
Dr Mike Jennings	Support 20/2	The RPS is badly written and the author seems in many parts to not understand what she has written and the implications thereof. The ORC has no mandate to write this RPS with Kai Tahu as a partner or consider its views any more important than any other citizen, grouping or business. As a Treaty partner, Kai Tahu have been given the same rights as all New Zealanders and have no special democratic rights.
Dr Mike Jennings	Support 20/7	It is far beyond the mandate of the ORC to make changes to our democratic processes by giving privileged rights to Kai Tahu and their commercial representative. The people of Otago will strive to ensure that all of us will continue to have equal access to the democratic processes irrespective of race, religion, politics and commercial interest. Your efforts to give preference to the commercial/cultural views of Kai Tahu/Ngai Tahu are disrespectful of your voters.
Peter Foster	Support 67/7	It is wrong for you to try to give Kai Tahu or any other group special rights of landscape management, membership rights on hearing panels, secret funding, special access to private land, special ability to restrict access to non-Kai Tahu land etc. Please delete the whole of chapter one, remove all references to special Kai tahu rights and emphasize that all citizens have equal rights. The LGA and the National Policy Statements do not allow for RPS "Partners". There is no place in this country for race-based government and no place for whatever twisted ideology has given rise to the racist policies of this RPS. Get it fixed.

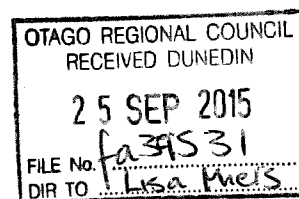
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Office of the Mayor

25 September 2015

Mr Stephen Woodhead
Chairperson
Otago Regional Council
Private Bag 1954
Dunedin 9054



Dear Stephen

DUNEDIN CITY COUNCIL FURTHER SUBMISSION ON THE PROPOSED OTAGO REGIONAL POLICY STATEMENT

Introduction

Thank you for the opportunity for continuing involvement in the development of the Regional Policy Statement (RPS). The DCC has responsibility to give effect to the Regional Policy Statement under the Resource Management Act (RMA) 1991, particularly through the District Plan, but also through other roles such as provider of services and infrastructure and as a community educator and advocate.

Therefore alignment between the Regional Policy Statement and Dunedin City Council's Strategic framework is important as is consistency between the Regional Policy Statement and the District Plan. As a result the DCC has considered the submissions to the RPS in relation to what is important in meeting the DCC's responsibilities to the Dunedin community.

We would like to highlight that the general issues relating to the overall structure and approach of the RPS, raised at the beginning of the Council's submission, do not appear to have been acknowledged or addressed in the summary of submissions.

Further Submission

The DCC's draft submission is set out in the below table. Please note that this further submission is subject to formal ratification by the Council on 27 October 2015.

A copy of this submission has been served on the submitters identified.

The DCC does wish to be heard in support of its submission and further submission.

Yours sincerely

Dave Cull
Mayor of Dunedin

DUNEDIN CITY COUNCIL FURTHER SUBMISSION ON THE PROPOSED OTAGO REGIONAL POLICY STATEMENT

Name of Submitter	Provision	Submission Ref	Support or Oppose	Reasons
Dunedin City Council	Whole RPS (overall approach)	156	Note	The DCC highlights that the points relating to the structure of the RPS raised on page 2 of the Council's submission, do not appear to be acknowledged or addressed in the summary of submissions. The ORC is asked to consider restructuring the RPS to address each resource type in separate chapters. Each chapter would include issues, objectives, policies, methods, and anticipated environmental results as a coherent narrative.
Dunedin City Council	Whole RPS (overall approach)	156	Note	The DCC highlights that the general points relating to the whole RPS, raised in pages 1 to 3 of the Council's submission do not appear to be included in the summary.
Forest and Bird	Whole RPS (overall approach)	98	Support	The DCC supports this submission in so far as it raises concerns about the structure of the RPS around the pillars.
McKeague Consultancy Ltd	Whole RPS (overall approach)	89	Support	The DCC supports this submission in as far as it seeks amending all enabling policies that use the word 'avoid'. Otherwise it will be difficult to give full effect to the RPS.
Central Otago District Council	Regionally Significant issues	37	Support	The DCC supports this submission seeking more comprehensive and identification of regionally significant issues within the RPS.
Clutha District Council	Regionally Significant issues	28	Support	The DCC supports this submission seeking clear identification of regionally significant issues within the RPS.
Fish and Game (South Island)	Regionally Significant issues	118	Support	The DCC supports this submission seeking clear identification of regionally significant issues within the RPS.

Name of Submitter	Provision	Submission Ref	Support or Oppose	Reasons
Herbert Heritage Group	Regionally Significant issues	41	Support	The DCC supports this submission seeking clear identification of regionally significant issues within the RPS.
Nagle	4 Introduction	111	Support	The DCC supports that an overview is required in the introduction of how other policy document plan fit and how RPS issues objectives, policies and methods connect.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui	Policy 2.1.1: add new provisions: <ul style="list-style-type: none"> • "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 discharges will have adverse effects on the life supporting capacity of the land." • "Encourage/require where appropriate progressive upgrading of sewage and stormwater discharge to water to include land treatment". • "Prioritise customary use and instream values over abstractions". 	154	Oppose	The submitter does not describe how these policies would be given effect to through methods. <ul style="list-style-type: none"> • When processing discharge consent applications, various matters must be considered. It is not always possible or feasible to discharge to land, and other matters must be considered including whether the effects of discharge to water are acceptable following remedy or mitigation. Cost and efficiency are also factors that must be considered. • 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. At any rate, this is not achievable as essential discharges such as landfills and effluent disposal fields, are likely to have such an adverse effect. • Land treatment may not be appropriate in all circumstances. If such a provision were to be considered by the ORC, upgrades and land treatment should be promoted rather than required. • The issue of priority of water use/allocation would require thorough public consultation. The purpose of the RMA enables the wellbeing of

Name of Submitter	Provision	Submission Ref	Support or Oppose	Reasons
				people and communities while looking after the environment. We suggest the abstraction of water for community and domestic use would be an appropriate priority over other uses.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	Policy 2.1.3: add new provisions "Avoid discharge of contaminants (including wastewater) to coastal waters."	154	Oppose	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.
Southern District Health Board	Policy 2.1.3: add a new provision: "Ensure that where at all practicable to do so, stormwater discharges in the coastal environment are treated to the point that the effect of the discharge on the environment is no more than minor."	57	Oppose	<p>Stormwater should only be treated prior to discharge where necessary: that is, where there would otherwise be significant adverse effects attributable to the discharge. Given the volumes that may be generated, and the configuration of existing infrastructure and available land, it may not be possible to treat stormwater, or where it is possible, it may be difficult and costly with minimal improvement.</p> <p>The level of detail requested may belong in a Regional Plan, rather than the Regional Policy Statement.</p>

Name of Submitter	Provision	Submission Ref	Support or Oppose	Reasons
QLDC	Objective 3.3 - Avoiding increased natural hazard risk	95	Support	DCC supports the submission that the objective should consider that the frequency of extreme events is increasing, thereby increasing demands on infrastructure networks.
Hokonui Runanga	Policy 3.4.1: add a new provision: Ensure new development includes land treatment of sewage and stormwater and encourage/require where appropriate progressive upgrading of sewage and stormwater discharge to water to include land treatment.	154	Oppose	Land treatment may not be appropriate in all circumstances. If such a provision were to be considered by the ORC, it is considered that upgrades and land treatment should be promoted, rather than required.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	Policy 3.4.2: add a new provision, to manage infrastructure activities to – “Maintain and enhance Kai Tahu values and sites of significance”	154	Oppose	The submitter does not describe how this policy would be given effect to through a method. While sites of significance can be defined through mapping, it is unclear how an infrastructure provider would know whether Kai Tahu values were affected, or how they could be maintained and enhanced.
Clutha District Council	Policy 3.6.6 - Reducing long term demand for fossil fuels	28	Support	This is consistent with DCC submission point on policy 3.6.6 part (b) ii.
QLDC	Policy suite 3.7 - Urban areas are well designed, sustainable and reflect local character	95	Support	The DCC supports QLDC amendment to 3.7.1(c) in that the use of the word 'avoid' may not be appropriate or achievable.

Name of Submitter	Provision	Submission Ref	Support or Oppose	Reasons
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	Policy 3.9.2: add policies to address general waste management.	154	Support	This is consistent with the DCC submission seeking further recognition and address of waste management (and minimisation) as a regionally significant issue.
Queenstown Lakes District Council	AER 3.1 Climate Change	95	Support	Agree with the comment that climate change is an unknown quantity and the AER should be rephrased in to reflect the goal of improving community resilience and reducing liability associated with climate change.

Address for Service:

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50 The Octagon
Dunedin 9016

Attention: Nicola Pinfold, Group Manager Community and Planning
Phone: 03 474 3327
Email: nicola.pinfold@dcc.govt.nz

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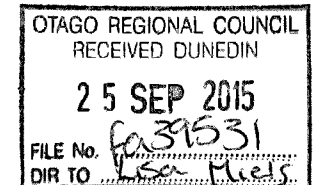
FURTHER SUBMISSION ON THE PROPOSED REGIONAL POLICY STATEMENT FOR OTAGO

NAME OF FURTHER SUBMITTER – Shotover Park Limited and Queenstown Park Limited

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I do wish to be heard

If others make a similar submission, I will consider presenting jointly with them at a hearing

I do have an interest in the proposal greater than the interest that the general public has

Signed

Date 25 September 2015

For and on behalf of Shotover Park Ltd and Queenstown Park Ltd.

	Submitter the further submission relates to	Submitter number	The part of the submission the further submission relates to	Oppose/support	Reasons
	Whole Regional Policy Statement- overall approach				
1.	Darby Planning Limited	81	Change the provisions to recognise the benefits of tourism, employment, recreation activities, subdivision and the value of rural land with value beyond primary production.	Support	It is important that the RPS provisions recognises the benefits of tourism, employment, recreation activities and the value of rural land beyond rural production.
2.	McKeague	89	Amend all policies using the word "avoid",	Support	Case law indicates that the word "avoid" in a RPS,

	Consultancy Limited		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".		would normally correspond with a prohibited activity in regional and district plans. This means particular circumstances of the activity cannot be taken into account. Use "avoid" sparingly in the RPS and only where it is certain the activity will never be appropriate.
3.	Erik Olssen	96	Sustainable economic growth should be the central issue of the Proposed RPS	Support	Enhancing the economic wellbeing of the region is important.
4.	Fonterra Co-operative Group Limited	99	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	Support	It is important to recognise that natural and physical resources should be used for the social and economic wellbeing of the community.
5.	Waitaki Irrigators Collective Limited	113	Reconsider the use of the word "avoid" throughout the PRPS	Support	Agree with the submitter that the RPS should allow decision-makers some discretion to consider the merits and effects of particular activities and proposals on a case-by-case basis.
6.	Wise Response Society Inc	114	Shift the focus of activity away from promoting economic development and financial return to sustainably managing of the natural and physical resources, as required under RMA S5.	Oppose	Economic prosperity is important; Section 5 of the Act refers to 'social and economic wellbeing' and it is appropriate that this is reflected in the RPS
7.	Federated Farmers of New Zealand	115	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).	Support	Support the submission requesting a review of the use of the word 'avoid', 'prevent' or 'require', and agree that the RPS should not prescribe direction to the Territorial Authorities.

			TLAs should have sufficient scope to address local issues and opportunities within the local context through local planning processes		
8.	Oceana Gold (New Zealand) Limited	140	Rebalance the provisions to place a greater emphasis on enablement	Support	Agree that overall the proposed RPS does not yet achieve the right balance for the sustainable management of Otago's natural and physical resources. Agree that as presently drafted it appears that the proposed RPS is more focused on protection than enablement. That is not what the RMA calls for, and not what Otago needs.
9.	Oceana Gold (New Zealand) Limited	140	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.	Support	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.
10.	Ravensdown Works Limited	143	Amend the use of the term "Avoid".	Support	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.
11.	Straterra	151	<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". 	Support	Agree that the RPS needs amending to be fit for purpose and provide for the appropriate consideration of proposals for economic development.
12.	Dunedin City Council	156	Enabling policies should be able to override	Support	Agree that enabling policies should be able to

			more specific avoidance policies.		override avoidance policies.
13.	Regionally Significant issues				
14.	Central Otago District Council	37	State the significant resource management issues for the Otago region	Support	Agree that 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
15.	Introduction- RPS framework				
16.	AgResearch Ltd	116	Identify "regionally significant issues" instead of "outcomes". • Include the following as a "regionally significant issue" "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)."	Support	None of the four identified "Outcomes" focus on encouraging future economic growth within the Otago Region.
17.	Introduction- the Treaty Partner				
18.	Transpower New Zealand Limited	97	In "Expression of Te Tiriti o Waitangi": • Remove the following text from the first bullet point: "Recognising the rights and interests of Kai Tahu to be involved in natural and resource management processes in Otago including decision making processes and implementation. " • Include the following text to bullet point 3: "Protecting traditional food gathering sites from any use or development which may threaten the values of these areas, to the	Support	The RPS elevates Kai Tahu above all other parties by allowing them a role in the decision making process, which is inconsistent with the RMA. • Traditional food gathering sites should be protected as far as practicable from use or development, but Council must recognise that some developments/use (e.g. nationally or regionally significant infrastructure) have to be located in specific areas. Furthermore it should depend on the significance of the values associated with the site.

			extent practicable."		
19.	Dunedin City Council	156	Amend first bullet point on page 7 as follows: Recognising the rights and interests of Kai Tahu to be involved in natural and resource management in Otago, including decision-making processes and implementation	Support	Agree that the RPS should accurately reflect Kai Tahu rights in terms of consultation
20.	Schedule 3 – Significance Threshold				
21.	Central Otago District Council	37	Delete schedule 3	Support	Agree that a standard mechanism for assessing significance of adverse effects is a de facto rule and is inappropriate in the RPS. Share the submitters concern that schedule 3 poses a potential increase in consenting costs.
22.	Royalburn Farming Company Ltd, Walter Peak Station, Millbrook Country Club, Eastburn Farm Limited, RCL Queenstown PTY limited, Damper Bay Estates Limited, Halfway Bay Station, Water Tight Investments Limited	102, 103, 104, 105, 106, 107, 108, 109	Delete Schedule 3 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,	Support	Agree that the practicality of applying schedule 3 is questionable. Agree that 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.
23.	Director General of Conservation	117	Retain Schedule 3 as notified	Oppose	Schedule 3 is not helpful, and is broad, unhelpful and inconsistent with caselaw.
24.	Environmental Defence Society Incorporated	127	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.	Oppose	Oppose the suggestion that there should be areas subject to a requirement to avoid adverse effects.
25.	Soho Basin Skifield	129, 130,	Delete Schedule 3 or	Support	Agree that the practicality of applying schedule 3 is

	Limited, Northlake Investments Limited, Shotover Country Limited, Ayrburn Farm Developments Limited, Bridesdale Farm Developments Limited, Glencoe Station Limited, Treble Cone Investments Limited, Woodlot Properties Limited, Henley Downs Farm Holdings Limited, Real Journeys	131, 132, 133, 134, 135, 136, 137, 138	• 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,		questionable. Agree that 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.
26.	Chapter B1- General Requests				
27.	Queenstown Lakes District Council	95	Make greater reference to Iwi Management Plans, instead of replicating	Support	Agree that Iwi management plans should be referenced in favour of repetition.
28.	Need 1.2				
29.	Otago Water Resource Users Group	121	Amend the "Need" statement associated to Objective 1.2 (p. 16) as follows: "In managing our natural resources, local authorities need to recognise Kai Tahu values and have regard to Kai Tahu plans more effectively, and enable the exercise of customary rights."	Support	Provision currently implies that local authorities have not been sufficiently effective in recognising Kai Tahu values and plans. However, the Regional Plan: Water appropriately recognises Kai Tahu values. "To recognise Kai Tahu plans" is too absolute and suggests the Kai Tahu plans are binding on local authority plans. Method 1.1.2 of the Proposed RPS uses the more appropriate phrase "Have regard to Iwi Management Plans". "To enable the exercise of customary rights" is too absolute. Section 6 of the RMA refers to recognising

					and providing for the protection of "protected customary rights" not "customary rights".
30.	Introduction to Objective 1.1				
31.	Federated Farmers of New Zealand	115	Amend as follows (or words to similar effect): "A partnership approach, which involves Kai Tahu and elevates appropriately considers their values, rights and interests in decision making processes, enables ..."	Support	elevating" values, rights and interests goes significantly beyond the expectations of Te Tiriti o Waitangi and undermines the reasonable expectation that other residents and resource users in the Otago region can both take part in and inform resource management discussions in an effective manner
32.	Policy 1.1.2 Taking the Principles of the Tiritiri o Waitangi into Account				
33.	Alliance Group Limited, Powernet Limited, HW Richardson Group Limited	56, 60, 61	Amend as follows: "Ensure that local authorities exercise their functions and powers, to: a) Accord Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and, ... d) Ensure Kai Tahu have the prerogative to: Recognise and provide for Kai Tahu to identify their relationship with their ancestral lands, water, sites, wahi tapu and other taoka by: i. Identify their relationship with their ancestral lands, water, sites, wahi tapu, and other taoka; and ii. Determine how best to express that relationship; and e) Ensure Kai Tahu are able to Have regard to the exercise of kaitiakitaka; and ..."	Support	<ul style="list-style-type: none"> • Maintaining good working relationship with Kai Tahu when dealing with resource management issues is already a requirement inherent within the RMA6(e), 7(a) and 9. • Clause (a) does not appear to have an identified resource management purpose and should be deleted. It is inconsistent with the notification determination which focuses on the extent of effects, not the status of a party. • Clauses (d) and (e) require further amendment to better align with sections 6 and 7 of the RMA.
34.	Transpower New Zealand Limited	97	Amend the text as follows: "Ensure that local authorities exercise their functions and powers to:	Support	Supports the principle that Kai Tahu values, rights and interests are considered in the resource management process but does not consider that Kai

			<p>a) Accord Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner; and</p> <p>b) Involve Kai Tahu in resource management decision-making processes and implementation; and</p> <p>c) Take into account Kai Tahu views values in resource management ..."</p>		Tahu should be elevated above all other parties, as not consistent with Part 2 RMA, in particular section 6-8.
35.	Objective 1.2- Kai Tahu Values, rights and interests and customary resources are maintained				
36.	Alliance Group Limited, Powernet Limited, HW Richardson Group Limited, Queenstown Airport Limited	56, 60, 61, 122	Amend as follows: "Kai Tahu values, rights and interests and customary resources are sustained <u>recognised and provided for</u> ."	Support	<ul style="list-style-type: none"> • A requirement to "recognise and provide for" Kai Tahu values will provide a broader framework for the management of these values. • Reference to "rights" should be deleted as the subsequent policies do not provide any further context around what specific "rights" are being referred to.
37.	Policy 1.2.1 Managing the natural environment to support Kai Tahu wellbeing				
38.	Federated Farmers of New Zealand	115	<p>Amend as follows (or words to similar effect):</p> <p>"Manage the natural environment to support Kai Tahu wellbeing by:</p> <p>a) Ensuring resources support their customary uses and cultural values <u>are identified</u> (as detailed in Schedules 1A and B); and</p> <p>b) Safe-guarding the life supporting capacity of natural resources)."</p>	Support	<p>The policy is unclear and elevates Kai Tahu concerns within each resource management issue. In some regulatory matters this may be appropriate; in others it would result in unnecessarily high consenting costs, time delays and issues for resource users, creating tension.</p> <ul style="list-style-type: none"> • Kai Tahu values, interests and concerns should be identified through the RPS, but managed through specific management planning contexts. • Need for greater certainty around how the values translate at the resource use level. Currently the values and interests outlined in schedule 1A and 1B are not sufficiently detailed to provide this clarity.
39.	Policy 1.2.3 Protecting important sites and values of cultural significance to Kai Tahu				

40.	New Zealand Petroleum and Minerals	86	Amend limb a) of Policy 1.2.3 as follows: "a) Avoiding , <u>remedying, or mitigating</u> significant adverse effects on those values and sites, as detailed in Schedule 3; ..."	Support	<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. Given the breadth of sites of possible cultural significance as listed in Schedule 1C, prevention of development may not always be the appropriate resource management outcome. 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.
41.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Limited, Soho Basin Skifield Limited, Northlake Investments Limited, Shotover Country Limited, Ayrburn Farm Developments	102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Amend a) as follows: "a) Avoiding significant adverse effects <u>from inappropriate subdivision, uses and development</u> on those values and sites , as detailed in Schedule 3 ; and"	Support	Agree with this suggested amendment to Policy 1.2.3 to reflect the RMA.

	Limited, Bridesdale Farm Developments Limited, Glencoe Station Limited, Treble Cone Investment Limited, Woodlot Properties Limited, Henley Downs Farm Holdings Limited, Real Journeys,				
42.	Oceana Gold (New Zealand) Limited	140	Amend (a) to read: "(a) Avoiding, remedying or mitigating significant adverse effects on those values and sites as detailed in Schedule 3.	Support	Agree that Policy 1.2.3 needs to be amended to recognise that in some circumstances effects do not need to be avoided. As per further submission above, the policy would better reflect Part 2 of the RMA by either adding 'inappropriate subdivision use or development, or adding remedying or mitigating.' Both suggestions are supported.
43.	Policy 1.2.4 Enabling Kai Tahu Relationships with wahi Tupuna and associated sites				
44.	Federated Farmers of New Zealand	115	Amend as follows (or words to similar effect): "Enable Kai Tahu relationships with wahi tupuna and associated sites by: a) Facilitating Kai Tahu access to sites of cultural significance, <u>encouraging enagement between landowner and Kai Tahu where these exist on or accessed by private land; and ...</u> "	Support	Agree with the submitter that while the intent of the policy is supported, open access at all times can be dangerous (for both those seeking access and the landholder) and is often impractical
45.	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou	154	• Reword policy as follows: "Enabling Kai Tahu relationships with wahi tupuna and associated sites <u>and landscapes</u> by	Oppose	Inclusion of landscapes gives the policy broader application, and as identified in the submission by Federated Farmers, open access to sites can be dangerous. This could be worsened by inclusion of

	and Hokonui Runanga		<p>a) Facilitating Kai Tahu access to sites and landscapes of cultural significance; and</p> <p>b) Recognising that relationships <u>between sites and landscapes</u> of cultural significance are an important element of wahi tupuna; and</p> <p>c) Recognising <u>and using</u> traditional place names."</p> <p>• Add Method 1 — Kai Tahu Relationships.</p>		landscapes.
46.	Policy 1.2.5 Enabling sustainable use of Maori land				
47.	<p>Royalburn Farming Company Limited,</p> <p>Walter Peak Station,</p> <p>Millbrook Country Club, Eastburn Farm,</p> <p>RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm</p>	<p>58, 102,</p> <p>103, 104,</p> <p>105, 106,</p> <p>107, 108,</p> <p>109, 129,</p> <p>130, 131,</p> <p>132, 133,</p> <p>134, 135,</p> <p>136, 137,</p> <p>138</p>	<p>Amend b) as follows: "b) Avoiding significant adverse effects from inappropriate development on matters of national importance; and"</p> <p>• Delete c).</p>	Neutral	<p>While the amendment to this policy to provide better consistency with terminology in the Act is supported (i.e. addition of 'from inappropriate subdivision, use and development'), this policy only applies to land within native reserves. Clarification as to the land to which this applies would be useful.</p>

	Holdings Ltd, Real Journeys Ltd				
48.	24. Chapter B2- General Requests				
49.	Fonterra Cooperative Group Limited	99	Include a new Objective: "Objective [X] Otago's special amenity landscapes and highly valued natural features are identified and protected from inappropriate development Otago has a number of special amenity landscapes or natural features which are highly valued but which are not outstanding for the purposes of section 6 of the Resource Management Act 1991. Often, enabling development in these areas will be appropriate provided significant adverse effects can be appropriately avoided, remedied or mitigated."	Neutral	Don't necessarily agree with the suggested objective, but agree with the submitter that the approach of protection and enhancement of resources that fall within the scope of section 6 of the Act is not warranted for resources of lesser importance. Need to provide context for policies 2.2.5, 2.2.6, 2.2.10, 2.2.11, 2.2.14 and 2.2.15 and for landscapes and features that do not fall within section
50.	Landscape Connections Trust	123	Review Objectives 2.1, 2.2 and 2.3 to ensure wording adequately addresses the maintenance and enhancement of landscape values, healthy ecosystems, habitats, and of the life-supporting capacity of air, water, soil and land. • Review related policies to ensure this is consistent throughout the Chapter. This may involve adding new policies	Oppose	The objectives and policies are already detailed and complex, and do not adequately enable diversification, or accept that in some instances adverse effects are appropriate. Adding greater levels of protection and complexity is opposed
51.	Environmental Defence Society Incorporated	127	Include a chapter focused on Outstanding Natural Features and Landscapes (ONFLs) and incorporating the necessary provisions to respond to the specific submissions contained in EDS' submission [i.e.: • Regionally significant issues relating to ONFLs;	Oppose	The submitter is requesting a greater level of protection, and suggests that the proposed provisions are insufficient. This is opposed; if anything the proposed policies are too strong

			<ul style="list-style-type: none"> • Specific objectives relating to ONFLs - See examples in Annexure 2-B of the EDS submission.; • Policies and methods which clearly identify the activities which must be managed and how in order to protect the integrity of ONFLs and amenity landscapes.] 		
52.	265 Outcome 2 and introduction				
53.	Waitaki District Council	70	Amend the 2nd paragraph of the introduction to Chapter B2 to: " It is critical to recognise the value we place on Otago's natural resources and to manage these resources accordingly. This includes identifying resources which we want to preserve maintain for future generations."	Support	Agree with the submitter that the introduction should be amended to reflect the fact that the only requirement to preserve in Part 2 of the RMA relates to preserving the natural character of the coastal environment. There is no generic mandate to preserve Otago's natural resources.
54.	Queenstown Lakes District Council	95	Introduction to Chapter 2: Greater emphasis on natural values and ecosystem services.	Oppose	The proposed wording is appropriate without the suggested amendment.
55.	Issue 2.1- Degradation of Otago's natural resources				
56.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Amend Issue as follows: "Degradation of <u>natural</u> values and natural systems risks loss of complexity, which in turn jeopardises the life sustaining capacity of the environment, and the ecosystem services provided to the community. Knowledge of these systems and their interdependencies is often imperfect. Cumulative effects of human activities on the <u>natural</u> environment may be difficult to pinpoint initially, but over time will <u>can</u> cause serious damage."	Support	Agree that regional issues include natural resource management issues

	Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd				
57.	Oceana Gold (New Zealand) Limited	140	Change to: "Cumulative effects of human activities on the environment may be difficult to pinpoint initially, but over time will may cause serious damage."	Support	Agree with the submitter that serious damage is a possible but not certain outcome of cumulative effects of human activities on the environment.
58.	26 Issue 2.2 Highly valued natural resources				
59.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd,	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Amend 2nd paragraph as follows: "These highly valued resources risk becoming degraded if they are not adequately protected from inappropriate subdivision, use and development "	Support	Agree with the amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.

	Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd				
60.	Oceana Gold (New Zealand) Limited	140	Add to the end of the issue: " <u>At the same time, the ability to undertake activities that affect or use these resources is fundamental to Otago's economic wellbeing.</u> "	Support	Agree that it is important to recognise that Otago's significant and highly valued natural resources are a source of the region's development potential and need to be able to be appropriately used. The region's mineral resource is an obvious example of this.
61.	29 Objective 2.1- The values of natural resources are recognised, maintained or enhanced				
62.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd,	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Amend Objective as follows: "Objective 2.1 The <u>regionally significant</u> values of Otago's natural and physical resources are recognised, and protected from inappropriate subdivision, use and development maintained and enhanced ."	Support	Agree that the objective should better reflect the wording of the Act.

	Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd				
63.	Ballance Agri-Nutrients Limited, Pioneer Generation Ltd	141, 142	Amend as follows: "The values of Otago's natural and physical resources are recognised, maintained and <u>,where appropriate, enhanced</u> "	Support	This submission recognises that it is not always practical to achieve enhancement
64.	31 Policy 2.1.1- Managing for freshwater values				
65.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties,	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	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	Support	Agree that the suggested amendment better reflects the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development. Agree that the PRPS should be focused on resource management issues of regional significance

	Henley Downs Farm Holdings Ltd, Real Journeys Ltd				
66.	32 Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins				
67.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	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 ; and ... g) Protect Kai Tahu values from inappropriate subdivision, use and development ; and h) Provide for other cultural values , as identified in Schedule 1A ; and..."	Support	Agree with the submitters that the amendment better reflects the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development
68.	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki,	154	Add further policies to: - Manage water resources according to the philosophy and principle of ki uta ki tai and whole of catchment management.	Oppose	The policies are already complex and the suggestion to add a greater level of complexity and protection (for example, protection of natural character) is not warranted.

	Te Runanga o Otakou and Hokonui Runanga		<ul style="list-style-type: none"> - Protect from inappropriate subdivision, use and development. - Manage effects of gravel and vegetation removal on Kai Tahu cultural values, ecological values, natural character, natural functioning of lakes and rivers, wellbeing (including cultural) of people and communities. - Specifically address access to and along river and lake beds, including: <ul style="list-style-type: none"> ◦ maintenance and enhancement of Kai Tahu access to and along rivers and lakes, and sites associated with mahinga kai, wahi tapu and Wahi taonga ◦ recognise and provide for Kai Tahu access in areas where public access is not appropriate. - Provide for fish passage and corridors for indigenous species. - Protect and enhance riparian zones that provide spawning or other significant habitat for species such as inanga. - Protect natural character of rivers and lakes. - Cross reference other policies relating to integrated management. 		
69.	34 Policy 2.1.4 - Managing for air quality values				
70.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131,	Amend b) as follows: "b)Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and	Support	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.

	Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	132, 133, 134, 135, 136, 137, 138			
71.	35 Policy 2.1.5 - Managing for soil values				
72.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd,	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Amend as follows: "Recognise soil values that are of a regional significance , and manage <u>those</u> soils, to: ... f) Retain <u>Ensure the primary use of regionally significant</u> soil resources is for primary production <u>purposes</u> ; and g) Protect Kai Tahu values <u>from inappropriate subdivision, use and development</u> ; and h) Provide for other cultural values , <u>as identified in Schedule 1A</u> ; and ..."	Support	Support the suggested amendment because it better reflects the wording of the Act.

	Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd		k) Avoid contamination of soil from <u>inappropriate subdivision, use and development</u> ; and		
73.	36 Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values				
74.	Darby Planning LP	81	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" 	Support	Agree that 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.
75.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Amend e) and g) as follows: " e) Protect natural resources and processes that support indigenous biodiversity from <u>inappropriate subdivision, use and development</u> ; and" "g) Protect biodiversity significant to Kai Tahu <u>from inappropriate subdivision, use and development</u> ; and"	Support	The submission suggests a similar approach to softening clauses (e) and (g) of the Policy. The amendments better reflect Part 2 of the Act.

	Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd				
76.	Wise Response Society Inc	114	<p>Amend as follows:</p> <p>"Policy 2.1.6 Managing for ecosystem and indigenous biodiversity values Recognise and manage the values of ecosystems and indigenous biodiversity, and manage ecosystems and indigenous biodiversity, to:</p> <p>a) Main<u>Sustain and</u> enhance land, <u>estuarine and marine</u> ecosystem health and indigenous biodiversity; and</p> <p>b) Main<u>Sustain and</u> enhance areas of predominantly indigenous vegetation; and</p> <p>c) Buffer and link existing ecosystems for greater systemwide resilience; and</p> <p>d) Enhance<u>Protect important</u> hydrological systems<u>services</u>, including the services provided by tussock grassland; and</p> <p>e) Protect natural resources and processes that support indigenous biodiversity; and</p> <p>f) Maintain habitats of indigenous species</p>	Oppose	The submitter requests that the policy is strengthened further, and this is opposed. The policy should instead be amended to better reflect Part 2 of the Act, recognising that it is not necessary to protect in all instances, and the RPS should focus on values of regional and national importance.

			that are important for recreational, commercial, cultural or customary purposes; and		
77.	Federated Farmers of New Zealand	115	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 Important hydrological services, including the services provided by tussock grassland <u>are recognised and provided where appropriate; and ...</u> g) Protect Biodiversity significant to Kai Tahu <u>is identified and active management is encouraged; and "...</u>	Support	Agree with softening the policies to recognise that in some instances protection or avoidance is not possible, and Part 2 of the Act recognises this.
78.	Queenstown Airport Corporation	122	Delete the policy	Support	If the amendments suggested by other submitters aren't adopted, it is agreed that the policy should be deleted. This recognises that the policy applies to all ecosystems and has no regard to the significance of those ecosystems.
79.	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Amend policy as follows: "g) Protect <u>ecosystems</u> and biodiversity significant to Kai Tahu <u>including those valued as mahinga kai and taonga species, in a manner consistent with Kai Tahu values, rights and interests and principles; and"</u>	Oppose	Increasing the level of protection and application of this policy is opposed.
80.	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	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,	Oppose	The proposed policies are strongly worded and complex; adding further strength and complexity is opposed.

			<p>cultural, environmental and economic wellbeing of people and communities</p> <ul style="list-style-type: none"> • greater connectivity between ecosystems and habitats. <p>- Indicate priorities for protection.</p> <p>- Require integrated and coordinated management across catchments, and land/sea boundary, between individuals, agencies, non-government organisations and Kai Tahu.</p> <p>- Provide policy direction and criteria on use of offsets (developed with Kai Tahu).</p> <p>- Include a specific wetland protection and enhancement policy.</p>		
81.	37 Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes				
82.	Central Otago District Council	37	Explain how the attributes have been determined and align with Schedule 4.	Support	Agree that clarification should be provided as to the relationship between policy 2.1.7 and schedule 4. Any unnecessary repetition or complexity should be removed.
83.	38 Schedule 4 - Criteria for the identification of natural features and landscapes				
84.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Delete schedule	Support	<p>These matters are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards.</p> <ul style="list-style-type: none"> • Risk of inefficiencies in case of inconsistency with standard practice. • As applies to all landscape assessments, including for "Special Amenity Landscapes", there is a risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews.

	Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd				
85.	Environmental Defence Society Incorporated	127	EDS supports the criteria however an assessment methodology is required. This should identify that the identification of ONFLS is a three step process comprising: <ul style="list-style-type: none"> • Identification of the landscape unit boundaries. • Ascertaining whether a landscape is sufficiently natural, acknowledging that there is a spectrum of naturalness and that a landscape does not have to be pristine to be considered natural. • Assessing whether the landscape is outstanding at a regional level, such that it is conspicuous, remarkable and stands out from the rest. 	Oppose	This submission supports the retention of the schedule, and the addition of further complexity. Given our support for the submissions requesting deletion of the schedule, a suggestion of adding to the schedule is opposed.
86.	40 Objective 2.2 - Otago's significant and highly valued natural resources				
87.	Queenstown Airport Corporation	122	Amend as follows: "Otago's significant and highly-valued natural resources are identified, and protected or enhanced from inappropriate use or development."	Support	Agree with the submitter that this objective is too restrictive and generic in that it seeks to "protect" all of Otago's significant and highly valued natural resources.

88.	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."	Support	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. Agree with submitter that ORC should be cautious about calling for protection without any consideration of a proposal
89.	41 Policy suite 2.2 - Otago's significant and highly valued natural resources				
90.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Add the following new policy: "Managing cross boundary landscape effects Promote alignment of District Plans and integrated assessments of environmental effects when assessing landscape values and effects in landscapes which traverse territorial authority boundaries."	Support	Agree that this proposed policy would be as effective as the provisions on Special Amenity Landscapes, and significantly more efficient, in managing the occasional proposals that give rise to cross-boundary issues on landscape matters

91.	43 Schedule 5 - Criteria for the assessment of significant indigenous vegetation and habitat of indigenous fauna				
92.	Environmental Defence Society Incorporated	127	Retention of the 5 criteria headings. • Changes to align with, or substitution with EDS's preferred wording for - significant ecological areas criteria - significant ecological marine areas criteria [refer to submission]	Neutral	It is important that the RPS provide robust and comprehensive criteria.
93.	44 Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna				
94.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Amend as follows: " Protect and enhance <u>Manage subdivision, use and development that affects</u> the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by: a) Avoiding adverse effects on those values which contribute which will result in to the area or habitat losing its being significant <u>status</u> ; and b) <u>Avoiding significant adverse effects from inappropriate subdivision, use and development</u> 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 ... "	Support	Support the amendment of the policy to remove the terms 'protect and enhance' and the addition of 'from inappropriate subdivision use and development. This amendment better reflects Part 2 of the Act. We agree that the practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).

95.	Pioneer Generation Limited	142	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	Consistent with RPL's original submission, this submission correctly identifies that the provision should provide for protection and enhancement only where appropriate.
96.	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Add further policies to: - 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.	Oppose	Oppose the suggestion that additional policies should be added, that increase complexity and strengthen provisions by adding terms such as 'protect and enhance' as opposed to terms that are more consistent with Part 2 of the Act.

			<ul style="list-style-type: none"> • Cross reference to new Policy under Objective 2.3 regarding integrated and coordinated approach to indigenous biodiversity management. • Add Method 1— Kai Tahu relationships 		
97.	45 Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes				
98.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes , using the attributes as detailed in Schedule 4 . "	Support	Agree that these attributes are well set out by case law and district plans: little added-value if Schedule 4 is consistent with those standards. There is a risk of inefficiencies in case of inconsistency with standard practice, and agree that Schedule 4 should be deleted
99.	46 Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes				
100.	Royalburn Farming	58, 102,	Amend as follows: " Protect, enhance and	Support	Support the proposed amendments in so far as they

	Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	restore Manage subdivision, use and development that affects the values of outstanding natural features, landscapes and seascapes, by: 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 ... e) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and ... g) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values (h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate".		better reflect Part 2 of the Act, and recognise the importance of recreational and tourism activities, and that avoidance of effects is not always necessary nor appropriate. Agree that ski fields are appropriate to locate in alpine environments that may be considered outstanding natural landscapes.
101.	Straterra	151	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	Support	Support the suggested amendments that recognise that 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

			<p>b) Avoiding, remedying or mitigating other adverse effects on other values; and</p> <p>...</p> <p>e) Avoiding, remedying or mitigating 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>		
102.	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	<ul style="list-style-type: none"> • 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 	Oppose	Do not support the suggested addition.
103.	47 Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features				
104.	Clutha District Council	28	<p>Remove policy and associated reference in Method 4.2.2</p> <ul style="list-style-type: none"> • Alternatively, if the policy is to remain, amend method by changing "will" to "may" so implementation becomes optional. 	Support	Agree that the policy exceeds the requirements of the RMA, and if retained as currently proposed the provisions have the potential to cause economic and social costs.
105.	Federated Farmers of New Zealand Limited	115	Delete the policy	Support	We share the submitter's concern that the identification of these landscapes, and the inclusion of prescriptive policies has the potential to have significant economic and social costs.
106.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133,	<p>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 -"</p>	Support	<p>Agree with the submitters concern regarding the introduction of the term 'Special Amenity Landscapes'.</p> <ul style="list-style-type: none"> • Recognise desirability of aligning district plan frameworks where landscapes traverse district boundaries however, there is risk of different criteria being used in current or

	Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	134, 135, 136, 137, 138			proposed district plans, and hence, creating inefficiencies and potentially slowing down forthcoming district plan reviews. These concerns also relation to Schedule 4. • Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. A too high level of protection could have adverse effects on the economic and social wellbeing of communities.
107.	48 Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features				
108.	Clutha District Council	28	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.	Support	Agree that the policy exceeds the requirements of the RMA, and if retained as currently proposed the provisions have the potential to cause economic and social costs.
109.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137,	Amend as follows: " Protect or enhance the values of Manage special amenity landscapes and highly valued natural features, by: a) <u>Avoiding , remedying or mitigating</u> significant adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and	Support	Agree that the level of protection is not consistent with sustainable management: it will frustrate efficient use and development of resources and could prevent it, and it is better to ensure regionally significant, but not outstanding, landscapes values are managed to enhance amenity values and the quality of the local environment. • Most of Queenstown Lakes areas that are not

	Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	138	<p>b) Avoiding, remedying or mitigating other adverse effects on other values; and</p> <p>c) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</p> <p>...</p> <p>g) <u>Recognising and providing for the use of such resources including as places where productive activities, tourism, recreation, infrastructure, homes and work places are located.</u></p> <p>h) <u>Allowing values to adapt over time as communities and economies change.</u> "</p>		<p>Outstanding Natural Landscapes could fall within this category.</p> <ul style="list-style-type: none"> • The current Queenstown Lakes district plan allows for appropriately managed urban growth and developments in "visual amenity landscapes". If those activities deemed no longer appropriate, the economic and social wellbeing of communities could be adversely affected. • The practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).
110.	Wise Response Society Inc	114	<p>Amend as follows:</p> <p><u>"Policy 2.2.6 Protect and enhance remaining special amenity landscapes and highly valued natural features</u> Managing special amenity landscapes and highly valued natural features</p> <p><u>Protect or enhance to a standard above sustainable resource management the values of remaining special amenity landscapes and highly valued natural features, by:..."</u></p>	Oppose	Oppose the suggestion that the policy should be strengthened, in particular oppose the use of the terms 'protect and enhance'
111.	Oceana Gold (New Zealand) Limited	140	Delete	Support	If the policy is not amended as requested, then support the submitters request to delete the policy, because the policy appears to elevate special amenity landscapes and highly valued natural features by giving them equal protection to outstanding features in Policy 2.2.4.

					• These "lesser" areas should receive less protection.
112.	55 Policy 2.2.13 - Managing outstanding water bodies and wetlands				
113.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	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 <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	Support	Agree that the amendment better reflects the direction of Part 2 of the RMA.
114.	Wise Response Society Inc	114	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	Oppose	Strengthening the policy even further than proposed is enhanced. As currently worded the policy does not reflect the wording of Part 2 of the Act, and the suggested amendment increases this inconsistency.

			bodies and wetlands <u>to a standard above sustainable resource management by:</u> a) Avoiding <u>activities with risk</u> of significant adverse effects, including cumulative effects, on those values which contribute to the water body or wetland being outstanding; and ... e) <u>Promoting Encouraging</u> enhancement of outstanding water bodies and wetlands."		
115.	Straterra	151	Support subject to the following amendments: " <u>Protect 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 those values which contribute to the water body or wetland being outstanding; and ... d) <u>Avoiding, remedying and mitigating</u> Controlling the adverse effects of pest species, prevent their introduction and reduce their spread, and	Support	Support suggested amendments to the policy that better reflect Part 2 of the RMA. Agree that the RMA provides for effects based, and that the ORC should be cautious about calling for protection without any consideration of a proposal
116.	56 Policy 2.2.14 - Identifying highly valued soil resources				
117.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135,	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:	Support	Support amendment to the policy to provide greater clarity and focus.

	Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	136, 137, 138			
118.	57 Policy 2.2.15 - Managing highly valued soil resources				
119.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Dampier Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	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 ... e) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and d) Recognising that loss of regionally	Support	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). There is no recognition of potential for diversification, and that soils that are not of high quality may be better utilised for tourism or rural

	Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd		significant soils to urban expansion development may be appropriate near due to location and proximity to existing urban development , and infrastructure particularly when there is a lack of supply of land available for urban development ."		residential activity
120.	271 Introduction to Objective 2.3				
121.	Federated Farmers of New Zealand	115	Amend narrative to Objective 2.3 as follows (or words to similar effect): "Our resources are interconnected, <u>and</u> <u>while the use of these resources provide for</u> <u>the well-being of the Otago region,</u> the use of one can affect the values of another. Those interconnections are complex, and they are not always reflected in the functions of local authorities, or in the regional, district or city boundaries. <u>An example of this issue is</u> <u>Otago's coastal environment, a highly valued</u> <u>resource at the nexus between land and</u> <u>marine environments that may additionally</u> <u>include freshwater systems. These diverse</u> <u>resources contribute to distinct land and</u> <u>seascapes and support a corresponding</u> <u>range of ecosystems. For management</u> <u>purposes, the coastal environment is often</u> <u>partitioned into separate management units.</u> <u>Moreover, administration of this</u> <u>complex resource is guided by several</u>	Support	Agree with the submitter 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. • The key outcome sought is not consistency, about a reasonable management system. This can include both regulatory approaches and non-regulatory approaches, and may require a more nuanced response at the district planning level.

			statutes that are implemented by multiple authorities. This example illustrates why As a result, the management of natural resources needs to be integrated to ensure that resource management decisions are consistent and take appropriate account of the linkages between every part of the environment, where necessary."		
122.	59 Policy suite 2.3 - Natural resource systems and their interdependencies are recognised				
123.	Clutha District Council	28	Reduce and condense down to key issues if at all needed	Support	Support the suggestion to reduce the number of provisions and their complexity, and the removal of repetition.
124.	60 Policy 2.3.1 - Applying an integrated management approach among resources				
125.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Amend a) as follows: "a) Taking into account the impacts of management of one resource on the <u>environmental</u> values of another, or on the environment in general; and". • Add the following clauses: " c) <u>Ensuring that resource objectives are complementary across administrative boundaries;</u> and d) <u>Ensuring that environmental effects of activities on the whole of a resource are considered when that resource is managed by sub-units. "</u>	Support	Agree that regional issues include those land use issues that traverse territorial boundaries and would therefore benefit from a regionally integrated approach. • Amendments sought to improve the management of cross boundary issues and resources.

	Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd				
126.	61 Policy 2.3.2 - Applying an integrated management approach within a resource				
127.	Alliance Group Limited, Powernet Limited, HW Richardson Group Limited	56, 60, 61	Delete the policy	Support	Agree that the intended purpose or outcome of this policy is not clear and that it is inappropriate to try to manage resources in an integrated manner when only focusing on one resource. • Given the more specific policies that follow relating to the direction of integrated management on certain resource values HWRG submits that this policy should be deleted.
128.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd,	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Delete the policy	Support	The intended purpose or outcome of the policy is not clear and it is inappropriate to focus on one resource when trying to achieve integrated management

	Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd				
129.	62 Policy 2.3.3 - Applying an integrated management approach for freshwater catchments				
130.	Alliance Group Limite, HW Richardson Group Limited, Trustpower Limited	56, 61, 85	Amend to recognise that in achieving integrated management the human use and economic values of the resource should also taken into account	Support	Agree with the submitter that the human use (i.e. economic and community) values of resources should be clearly recognised and provided for in the integrated management of natural and physical resources
131.	Wise Response Society Inc.	114	Amend as follows: "Policy 2.3.3 <u>Applying integrated management to freshwater catchments</u> Applying an integrated management approach for freshwater catchments Apply an integrated management approach to activities in freshwater catchments <u>or</u> <u>landscapes</u> , that by: a) Achieve Using consistent freshwater obj ectives for interconnected water bodies; and b) Recognise ing the importance of river morphology, catchment hydrology, natural processes and land cover in supporting catchment values <u>and services</u> ; and c) Coordinate ing the management of land use and freshwater, to: i. Main <u>Sustain and</u> or enhance freshwater values; and ii. Main <u>Sustain and</u> or enhance the wetland values; and	Oppose	Oppose amendments that make the policy more directive.

			<p>iii. Main<u>Sustain and</u> enhance the values of beds of rivers and lakes, wetlands, and their margins; and</p> <p>iv. Reduce the potential for health and nuisance effects</p> <p>v. <u>Facilitate the achievement of other objectives and policies in this plan.</u></p>		
132.	64 Policy 2.3.5 - Applying an integrated management approach for airsheds				
133.	Alliance Group Limited, HW Richardson Group Limited	56, 61	Amend to recognise that in achieving integrated management the human use and economic values of the resource should also taken into account.	Support	Agree with the submitter that the human use (i.e. economic and community) values of resources should be clearly recognised and provided for in the integrated management of natural and physical resources
134.	Queenstown Airport Limited	122	Amend to recognise that poor air quality can result in adverse safety effects for aircraft and passengers.	Support	When providing for the integrated management of natural and physical resources consideration needs to be given to the potential for poor visual quality which can adversely impact on the safety of aircraft and passengers
135.	70 Issue 3.5 - Importance of infrastructure of regional or national significance				
136.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd,	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Amend as follows: " <u>It is important to recognise and provide for Significant Infrastructure of regional and national significance even though it may result in local adverse environmental effects impacts, or adversely affect other nationally important values ...</u> "	Support	Agree that significant infrastructure should be defined, recognised and provided for.

	Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd				
137.	76 Objective 3.1 - Protection, use and development of natural and physical resources recognises environmental constraints				
138.	Alliance Group Limited, Powernet Limited, HW Richardson Group Limited, Trustpower Limited	28, 56, 60, 61, 85	Either delete or amend objective 3.1. If retained and amended, make the objective clearer	Support	Agree with the submitters that the objective, as currently drafted, is too vague to be effective.
139.	The Fertiliser Association of New Zealand Inc.	110	Oppose Objective 3.1	Support	Agree with the submitter that the objective and policy 3.1.1 may be used to prevent development and/or activities because of 'perceived' constraints. Some constraints can be managed through the use of innovation, flexibility and technology.
140.	Federated Farmers of New Zealand	115	Amend as follows (or words to similar effect): "Protection, use and development of natural and physical resources <u>is environmentally sustainable</u> recognises environmental constraints. "	Support	Agree that should the objective be retained it should be amended to recognise that there can be positive effects of resource use.
141.	78 Policy 3.1.1 - Recognising natural and physical environmental constraints				
142.	Alliance Group Limited, Powernet	56, 60, 61, 85	Delete policy 3.1.1	Support	Reference to "environmental constraint" is ambiguous and should be removed.

	Limited, HW Richardson Group Limited, Trustpower Limited				<ul style="list-style-type: none"> • 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. • The weighing of individual policies that provide for development and those that seek protection will ensure that environmental constraints are considered.
143.	80 Policy suite 3.2 - Risk that natural hazards pose to Otago's communities are minimised				
144.	Queenstown Lakes District Council	95	Greater flexibility within the policy approach to enable consideration of hazards by means appropriate for the local context.	Neutral	The submitter's reason for this submission is unclear; if the QLDC is wishing to amend the policies to better enable infill development in areas where there is a high risk of natural hazards, then the submission is opposed.
145.	81 Policy 3.2.1 - Identifying natural hazards				
146.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd,	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Amend as follows: "Identify natural hazards that may adversely affect Otago's communities, including hazards of low likelihood and high consequence. "	Support	Agree that unnecessary text should be deleted.

	Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd				
147.	Federated Farmers of New Zealand Limited	115	Amend as follows (or words to similar effect): "Assess the consequences of natural hazards events on <u>Otago's human communities</u> , including by considering: ... k) <u>The costs (including to landowners) of mitigating the hazard.</u> "	Support	Agree that the regulatory responses to these potential hazards should be appropriate to the risk of the hazard to human communities and should avoid an unnecessarily onerous burden for non- inhabited farm structures. • The Proposed RPS should enable a balanced look at assessing the risks, and where the costs of addressing remote/minimal risk is unacceptably high for non-inhabited buildings/activities, this lower level of risk should be reflected in local regulation
148.	84 Policy 3.2.4 - Managing natural hazard risk				
149.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Amend as follows: "Manage natural hazard risk, including with particular regard to: a) The risk they posed, considering the likelihood and consequences of natural hazard events; and ..."	Support	Agree that 'including' is unnecessary, deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.

	Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd				
150.	85 Policy 3.2.5 - Assessing activities for natural hazard risk				
151.	Powernet Limited, Trustpower Limited	60, 85	<ul style="list-style-type: none"> • Insert a new clause at d): "<u>d) The extent to which the activity is functionally required to locate within a natural hazard risk area; and</u> ..." Consequential renumbering of the subsequent clauses 	Support	Agree that it is necessary to recognise that certain activities, are necessarily located within areas which would be classified as potentially high natural hazard risk (i.e. river environment, flood events).
152.	Dunedin City Council	156	Amend policy as follows: "Assess the <u>vulnerability</u> of activities to for natural hazard risk,..."	Support	The suggested amendment provides better clarity
153.	86 Policy 3.2.6 - Avoiding increased natural hazard risk				
154.	Queenstown Lakes District Council	95	<ul style="list-style-type: none"> • Widen the scope to enable consideration of the extent to which risk can be mitigated or reduced to tolerable levels. • Include reference to "avoiding or reducing natural hazard risk". • Include encouragement of design that facilitates an acceptable reduction in natural hazard risk. 	Support	Agree that the complete avoidance of natural hazard risks may not be appropriate or achievable.
155.	Dunedin City Council	156	Amend policy as follows: "Avoiding Managing increased natural hazard risk" and "Avoid Manage increasing natural hazard	Support	Agree that it is not achievable or realistic to avoid (prohibit) all new development or intensification in any area with any level of risk from natural hazards.

			risk..."		
156.	87 Policy 3.2.7 - Reducing existing natural hazard risk				
157.	Federated Farmers of New Zealand	115	<p>Amend as follows (or words to similar effect):</p> <p>"Reduce existing natural hazard risk, including by:</p> <p>a) Encouraging activities that <u>significantly</u>: ...</p> <p>b) Discouraging activities that <u>significantly</u>: ...</p> <p>c) Considering the use of exit strategies for areas of significant risk, <u>to human communities</u>; and</p> <p>d) Encouraging design that facilitates:</p> <p>i. Recovery from <u>significant</u> natural hazard events or</p> <p>ii. Relocation to areas of <u>significantly</u> lower risk; and ...</p>	Support	<p>Agree with the submitter that the significance of these impacts should be considered, as should the costs of mitigating or addressing these impacts.</p> <ul style="list-style-type: none"> • Clauses (a) and (b) should be qualified with a degree of significance
158.	Z Energy Limited, BP Oil NZ Limited and Mobil Oil NZ Limited	128	<p>Amend Policy 3.2.7 to recognise that it is not appropriate to reduce risk and that the focus should be on minimisation. This could be achieved by adopting wording along the following as follows:</p> <p>"a) New subdivision, use and development, shall:</p> <p>i. be avoided in areas where the risks of natural hazards to people, property and infrastructure are assessed as being unacceptable; and</p> <p>ii. otherwise be undertaken in a manner that ensures the risks of natural hazards to people, property and infrastructure are appropriately mitigated;</p> <p>b) Except that new infrastructure may be located in areas where the risks of natural</p>	Support	<p>Agree with the submitter that blanket avoidance and reduction approaches to natural hazard risk as taken in 3.2.6 and 3.2.7 is not appropriate, and therefore support the suggested amendment insofar as it recognises that in the majority of circumstances it will be appropriate for risk to be appropriately managed rather than avoided entirely.</p>

			hazards to people, property and other infrastructure are assessed as being unacceptable, provided that: i. there is no reasonable alternative; and ii. the strategic infrastructure has been designed to maintain, as far as practicable, its integrity and form during natural hazard events. iii. The natural hazard risks to people, property and infrastructure are appropriately mitigated."		
159.	Dunedin City Council	156	Add a third bullet point to (d) as follows: "iii. Mitigation of risk."	Support	Agree that ideally in increased risk areas there should be an opportunity to mitigate risk
160.	90 Policy 3.2.10 - Mitigating natural hazards				
161.	Z Energy Limited, BP Oil NZ Limited and Mobil Oil NZ Limited	128	Delete Policies 3.2.10 and 3.2.11 or otherwise provide justification as to why preference should be given to non engineering interventions to natural hazards.	Support	Agree that clarification is needed; while the phrase "hard mitigation measures" is not defined they may have unintended consequences for other mitigation measures that are widely employed across the region (e.g. a stormwater retention tank)
162.	91 Policy 3.2.11 - Locating hard mitigation measures				
163.	Z Energy Limited, BP Oil NZ Limited and Mobil Oil NZ Limited	128	Delete Policies 3.2.10 and 3.2.11 or otherwise provide justification as to why preference should be given to non engineering interventions to natural hazards.	Support	Agree that clarification is needed; while the phrase "hard mitigation measures" is not defined they may have unintended consequences for other mitigation measures that are widely employed across the region (e.g. a stormwater retention tank)
164.	96 Objective 3.4 - Good quality infrastructure and services meet community needs				
165.	Powernet Limited, HW Richardson Group Limited, Trustpower Limited, Queenstown Airport Corporation Limited	60, 61, 85, 122	Amend the objective as follows: "Good quality infrastructure and services meets community needs <u>on a local, regional and national scale</u> ."	Support	Agree that in some cases infrastructure is important at a national level, and the policy would be improved by recognising this
166.	98 Policy 3.4.1 - Integrating infrastructure with land use				

167.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Amend as follows: "Achieve the strategic integration of infrastructure with land use, by: ... b) Designing infrastructure to take into account: ... iv. Natural and physical Resource constraints; and v. Effects on the values of natural and physical resources; and ... c) Managing urban growth <u>in a coordinated manner to ensure</u> : i. Within areas that have sufficient infrastructure services are provided capacity; or ii. Where infrastructure services can be upgraded or extended efficiently and effectively ; and d) Co-ordinating the design and development of infrastructure with the staging of land use change, including with: i. Structural design and release of land for new urban development; or ii. Structural redesign and redevelopment within existing urban areas."	Support	Support the suggested amendments to the extent that they recognise that there is no need for this direction from the RPS. Where and how growth occurs cannot be entirely predicted and attempts to regulate are more likely to result in increased community costs than benefits in high growth areas.
168.	Queenstown Airport Corporation	122	Insert new clause e) as follows: " e) Ensuring that landuse and development does not result in adverse effects on the operation, use and development of infrastructure. "	Oppose	The policy already recognises the functional needs of infrastructure, and it is important that there is a balance between land use and development and infrastructure.
169.	99 Policy 3.4.2 - Managing infrastructure activities				
170.	Royalburn Farming	58, 102,	Amend as follows: "Manage infrastructure	Support	The suggested wording better reflects the

	Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	activities, to: ... b) Reduce <u>Avoid</u> , remedy or mitigate adverse effects of those activities, including cumulative adverse effects on natural and physical resources; and c) Support economic, social and community needs activities; and d) Improve efficiency of use of natural resources; and e) Protect infrastructure corridors <u>from</u> <u>inappropriate subdivision, uses and</u> <u>development for infrastructure needs,</u> now and for the future ; and ... g) Protect the functioning of <u>significant</u> <u>infrastructure</u> lifeline utilities and essential or emergency services."		terminology used in Part 2 of the RMA.
171.	101 Policy 3.4.4 - Managing hazard mitigation measures, lifeline utilities, and essential and emergency services				
172.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135,	Amend header as follows: "Policy 3.4.4 Managing hazard mitigation measures, lifeline utilities , significant infrastructure , and essential and emergency services". • Delete d).	Support	Agree that the practicality of applying Schedule 3 efficiently is very questionable. • Schedule 3 criteria are inadequate (see submission on Schedule 3).

	Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	136, 137, 138			
173.	286 Introduction to Objective 3.5				
174.	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Reword the explanation as follows: "Infrastructure of national and regional significance, including roads, rail, electricity generation and transmission, and telecommunication, are part of a national network, and contribute to the economic and social wellbeing of the nation." <u>"Whilst these aspects are important, we must also ensure that environmental and cultural values are protected from the adverse effects that can arise from infrastructure development"</u>	Oppose	Oppose the suggestion of additional text, particularly when it uses the term 'protection'. The text should better reflect the terminology of Part 2 of the Act.
175.	104 Policy 3.5.1 - Recognising national and regional significance of infrastructure				
176.	Royalburn Farming Company Limited,	58, 102, 103, 104,	Amend as follows: "Policy 3.5.1 Recognising and providing for	Support	Agree with the submission insofar as it recognises that the policy should be amended to recognise the

	Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	national and regional significance of infrastructure Recognise <u>and provide for</u> the national and regional significance of the following infrastructure: a) Renewable electricity generation facilities , where they supply the national electricity grid and local distribution network ; and ... f) <u>Structures for transportation by rail and tourism activities ."</u>		importance of tourism sector.
177.	105 Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance				
178.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137,	Amend as follows: "Policy 3.5.2 Managing adverse effects of <u>significant infrastructure that has national or regional significance</u> Minimise <u>Avoid, remedy or mitigate</u> adverse effects from significant infrastructure that has national or regional significance , by: a) <u>Requiring comprehensive alternative site assessments to be provided if a new</u>	Support in part	Agree that significant infrastructure should be defined, recognised and provided for, and the wording of Part 2 of the Act should be adopted. Agree with replacement of terms 'minimise' and 'avoid' with 'avoid, remedy and mitigate'

	Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	138	<p><u>development is proposed that will result in significant adverse effect on Giving preference to avoiding their location in :</u></p> <p>...</p> <p>b) Where it is not possible to avoid locating in the areas listed in a) above, <u>avoiding minimising</u> significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and</p> <p>...</p> <p>d) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and</p> <p><u>e) Considering Enabling infrastructure providers to employ the use of offsetting , or other compensatory measures to address , for residual adverse effects on the environment indigenous biodiversity ."</u></p>		
179.	108 Policy suite 3.6 - Energy supplies to Otago's communities are secure and sustainable				
180.	Darby Planning LP	81	Retain policy 3.6.6.	Support	Support the reduction in demand for fossil fuels through policies that encourage compact urban development and well integrated urban areas, including the provision of connections within and between urban areas
181.	117 Policy 3.7.1 - Using the principles of good urban design				
182.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133,	<p>Amend as follows: "Encourage the use of good urban design principles in subdivision and development in urban areas as detailed in Schedule 6, to:</p> <p>...</p> <p>b) Ensure that the built form relates well to its <u>surrounding natural</u> environment ,</p>	Support	<p>Schedule 6 not assessed in S32 report.</p> <ul style="list-style-type: none"> • Likely that will add to existing assessment requirements (urban design protocol & matters set out in District Plans) for little added benefits. • May be to the detriment of good urban design for specific sites.

	Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	134, 135, 136, 137, 138	including by: i. Reflecting natural features such as rivers, lakes, wetlands and topography; and ii. Providing for ecological corridors in urban areas; and iii. Protecting areas of indigenous biodiversity and habitat for indigenous fauna; and iv. Encouraging use of low impact design techniques; and v. Encouraging construction of warmer buildings; and ..."		
183.	118 Schedule 6 - Urban form and design				
184.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd,	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Delete schedule 6	Support	Schedule 6 not assessed in S32 report. • Likely that will add to existing assessment requirements (urban design protocol & matters set out in District Plans) for little added benefits. • May be to the detriment of good urban design for specific sites.

	Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd				
185.	121 Policy 3.7.4 - Designing for good access in public spaces				
186.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd,	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Amend as follows: " <u>Design and maintain</u> public spaces, including streets and open spaces, <u>to provide for a range of uses and meeting the reasonable access and mobility needs of all sectors within the community , including the young and those with mobility impairments .</u> "	Support	Removal of unnecessary provisions would provide clear direction

	Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd				
187.	123 Policy suite 3.8 - Urban growth is well designed and integrates effectively with adjoining urban and rural environments				
188.	Queenstown Lakes District Council	95	<p>The definition and function of urban growth boundaries within the Proposed RPS do not refer to staging or sequencing, or a specific time period for growth.</p> <ul style="list-style-type: none"> • Provide the framework for the use of Urban Growth Boundaries as a tool, but limit their mapping to the district plan without replication in the RPS. 	Support	Agree that urban growth boundaries should sit within the District Plan maps.
189.	124 Policy 3.8.1 - Managing for urban growth				
190.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd,	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	<p>Amend as follows:</p> <p>"Policy 3.8.1 Managing Providing for urban growth Manage Provide for urban growth and creation of new urban land in a strategic and co-ordinated way, by:</p> <p>a) <u>Understanding demand and supply of</u> Ensuring there is sufficient residential, commercial and industrial <u>zoned</u> land capacity, to and <u>catering for that demand for such land, projected over at least the next 10 years</u>; and</p> <p>b) Co-ordinating urban growth and extension of urban areas with relevant infrastructure development programmes, to:</p> <p>i. Provide infrastructure in an efficient and effective way; and</p> <p>ii. Avoid Discouraging additional costs on the public that arise from unplanned infrastructure expansion; and</p>	Support	<ul style="list-style-type: none"> • It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. • Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region. • Higher infrastructure costs may be appropriate when there is a net benefit to the community (e.g. where zoned land supply is increased to meet demand). It would be useful to clarify that relevant costs are those borne by the community. • Territorial authorities are well attuned to the costs of infrastructure provision: they do not need direction from an RPS. • "Considering the need for urban growth boundaries" should be a method, although it is not appropriate that the RPS specify a method to manage growth given the number of potential

	Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	<p>c) Identifying future growth areas that:</p> <p>i. Minimise <u>significant</u> adverse effects on rural <u>the productivity of the rural and tourism sectors</u>, including loss of highly valued soils or creating competing urban demand for water and other resources; and</p> <p>ii. Can be developed without resulting in significant adverse effects on any matter of national importance or national significance Maintain or enhance significant biodiversity, landscape or natural character values; and</p> <p>iii. Maintain important cultural or heritage values; and</p> <p>iv. iii. Avoid land with significant risk from natural hazards <u>which cannot be remedied or mitigated</u>; and</p> <p>d) Considering the need for urban growth boundaries to control <u>potentially inappropriate</u> urban expansion; and</p> <p>e) Ensuring efficient use of land; and</p> <p>f) Requiring the use of low or no-emission heating systems in buildings, when <u>where</u> ambient air quality in or near the growth area is:</p> <p>i. Below standards for human health; or</p> <p>ii. Vulnerable to degradation given the local climatic and geographical context; and</p> <p>g) Giving effect to the principles of good urban design, as detailed in Schedule 6; and</p> <p>h) Giving effect to the principles of crime prevention through environmental design</p>	<p>methods.</p> <ul style="list-style-type: none"> • "Avoidance" of natural hazards needs to be widened to "avoid, remedy or mitigate", which is consistent with case law and the RMA, particularly in hazard prone areas such as the Queenstown Lakes District. • Schedule 6 not assessed in S32 report. • Likely that will add to existing assessment requirements (urban design protocol & matters set out in District Plans) for little added benefits. • May be to the detriment of good urban design for specific sites.
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191.	Queenstown Airport Corporation	122	Insert the following clause between b) and c): " <u>Avoiding urban development which constrains the ability of regionally significant infrastructure or industry to be developed and used without undue constraint that may arise from adverse effects relating to reverse sensitivity or safety</u> ; and " • Renumbering clauses c) to h) accordingly.	Oppose	The additional text is not needed and the suggested wording is too strong. It is not always necessary to avoid urban development where it might constrain infrastructure.
192.	125 Policy 3.8.2 - Controlling growth where there are identified urban growth boundaries or future urban development areas				
193.	Clutha District Council, Waitaki District Council	28, 70	Delete reference to Schedule 8	Support	Having an unpopulated Schedule 8 doesn't create certainty, so no need to include it. • Schedule 8 can only be populated by way of a plan change, which is cumbersome and can create duplication of processes for both councils involved, as well as parties to the processes.
194.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Delete the policy	Support	If the policy is not amended, then it should be deleted. It is questioned whether this matter is relevant to the RPS. The policy attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.

	Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd				
195.	126 Schedule 8 - Urban Growth Boundaries				
196.	Darby Planning LP	81	Delete Schedule 8	Support	The identification of urban growth boundaries is not a matter of regional significance.
197.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties,	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Delete Schedule 8	Support	The identification of urban growth boundaries is not a matter of regional significance. Attempts to highly regulate the release of urban land for urban development are most likely to result in insufficient supply of land for urban growth which can result in significant adverse economic and social effects.

	Henley Downs Farm Holdings Ltd, Real Journeys Ltd				
198.	127 Policy 3.8.3 - Managing fragmentation of rural land				
199.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	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 <u>primary production or tourism</u> ; or ... b) Have particular regard to whether the proposal will result in a loss of the <u>productive potential of 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 , or there is a <u>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 public infrastructure investment , including domestic water supply and waste disposal; and d) Avoid creating <u>significant</u> competing	Support	The PRPS is too focused on recognising and providing for the primary production sector, with not enough recognition of and provision for the tourism sector. • Protecting highly valued soils over urban growth and development is not appropriate for all rural parts of the region

			demand for water or other resources.		
200.	133 Policy 3.9.4 - Managing the use of contaminated land				
201.	Dunedin City Council	156	<p>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: through the application of the NES for Assessing and Managing Contaminants in Soil to Protect Human Health. NES for Assessing and Managing Contaminants in Soil to Protect Human Health." 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 b) Where there is contamination: <ul style="list-style-type: none"> i. Requiring an assessment of associated environmental risks; and ii. Remediating land; and e) <u>Manage the ongoing effects of contaminant discharges to water or air from contaminated land, Considering the need for ongoing monitoring of contaminant levels and associated environmental risks."</u> 	Support	<p>There is an NES for Assessing and Managing Contaminants in Soil to Protect Human Health. Its purpose was to ensure a nationally consistent approach to contaminated land management upon subdivision, and to provide for activities with minor effect. Therefore an RPS policy may not be necessary.</p> <ul style="list-style-type: none"> • It is noted that the policy as drafted does not encompass all aspects of the NES, such as fuel tank removal. These disturbances, subdivision and changes in land use are local site-specific issues rather than regional issues. <p>Agree with the submitter's note that not all contaminated land requires remediation - it depends on what resultant sites are being used for.</p> <ul style="list-style-type: none"> • It is the on-going discharges to the environment from those sites which may have environmental effects, rather than the use of those sites. • Also please refer to our submission point on Method 3.1.4(g).
202.	134 Policy 3.9.5 - Avoiding the creation of new contaminated land				
203.	Royalburn Farming Company Limited,	58, 102, 103, 104,	Amend as follows: "Avoid the creation of new contaminated land <u>which would give</u>	Support	Avoiding the creation of new contaminated land may not always be appropriate or practical: in

	Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	<u>rise to risks to human health or would measurably degrade natural values</u> ".		remediating contaminated land it may be appropriate to move soil to another location depending on where it is situated and how that land is to be used. • The emphasis should be on avoiding risks to human health or the environment, consistent with the NES
204.	147 Objective 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity				
205.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137,	Amend as follows: " Significant hHistoric heritage resources are recognised and contribute to the region's character and sense of identity"	Support	The amendment better reflects the role of the RPS.

	Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	138			
206.	148 Policy suite 4.2 - Historic heritage resources are recognised and contribute to the region's character and sense of identity				
207.	Queenstown Lakes District Council	11	Include policies and methods to guide historic heritage assessments. • Include vegetation within the scope of the policies relating to historic heritage.	Oppose	Oppose the introduction of additional policies and methods that increase the RPS role in what should be a District Council function.
208.	152 Policy 4.2.3 - Managing historic heritage values				
209.	Trustpower limited, Queenstown Airport Corporation	85, 122	Amend the policy as follows: " To recognise and provide for the protection of historic heritage resource of the region from inappropriate subdivision, use and development by: a) Identifying and assessing the significance of the historic heritage resources within the region; b) Having regard to any relevant entry in the Historic Places register in the process of identifying and assessing the historic	Support	Support the suggested amendment insofar as the submitter recognises that the policy goes further than section 6f of the RMA lwi values, including the protection of wahi tapu and wahi taoka, are provided for in Chapter 1 and do not need to be repeated in this policy. The policy adopts a strong position on avoiding adverse effects on areas which might only have "suspected" heritage or cultural values. This is not considered an appropriate response.

			<p>heritage resource;</p> <p>c) Considering historic heritage items, places, or areas of significance or importance to communities in the process of identifying and assessing the historic heritage resource;</p> <p>d) Recognising that knowledge about some historic heritage may be culturally sensitive and support protection of those areas through the maintenance of silent files held by local authorities;</p> <p>e) Recognise that there may be sites of historic heritage which are unknown and having appropriate accidental discovery protocols in place to manage the discovery of such features ."</p>		
210.	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	<p>Reword as follows:</p> <p>"Managing historic <u>and cultural</u> heritage values.</p> <p>Protect and enhance the values of places and areas of historic <u>and cultural</u> heritage, by:</p> <p>d) Avoiding significant adverse effects on other values of areas and places of historic <u>and cultural</u> heritage; and</p> <p>h) Encouraging the integration of historic heritage values into new activities <u>including cultural heritage where appropriate and in consultation with Kai Tahu</u>; and</p> <p>i) Enabling <u>restoration</u>, adaptive reuse or upgrade of historic heritage places and areas where heritage values can be maintained."</p>	Oppose	lwi values, including the protection of wahi tapu and wahi taoka, are provided for in Chapter 1 and do not need to be repeated in this policy
211.	155 Policy 4.3.1 - Managing for rural activities				

212.	Darby Planning LP	81	<p>Amend Policy 4.3.1, as follows:</p> <p>"Manage activities in rural areas, to support the region's economy and communities, by:</p> <p>m</p> <p>d) Minimising the subdivision of productive rural land into smaller lots that may result in rural residential activities; and</p> <p>e) <u>Enabling tourism, employment, recreational and other activities, providing for other activities that have a functional need to locate in rural areas, including tourism and recreational activities that</u> and are of a nature and scale compatible with rural activities."</p>	Support	<p>The management of rural activities to provide for a wider base for the support of a diverse range of activities that sustain the regional economy is supported.</p> <ul style="list-style-type: none"> • Agree with the amendments that seek to enable activities such as tourism, employment and recreation development within rural areas as a significant contributor to the regional economy
213.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd,	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	<p>Amend as follows:</p> <p>" Managing for rural <u>Protecting regionally significant industry activities from inappropriate subdivision, use and development</u></p> <p>Manage activities in rural areas, to support the region's economy and communities, by:</p> <p>a) <u>Enabling regionally significant industry activities, farming and other rural activities that support the rural economy;</u> and</p> <p>b) <u>Minimising the loss of regionally significant soils highly valued for their versatility for primary production;</u> and</p> <p>c) <u>Restricting the establishment of activities in rural areas that may lead to reverse sensitivity effects on regionally significant industry activities;</u> and</p> <p>d) Minimising <u>Restricting the subdivision of</u></p>	Support	<p>Agree that the RPS is too focused on recognising and providing for the primary production sector, with not enough recognition and provision for the tourism sector.</p>

	Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd		productive rural land into smaller lots that may result in inappropriate rural residential activities; and e) Providing for other activities that have a functional need to locate in rural areas , including tourism and recreational activities that are of a nature and scale compatible with rural activities."		
214.	157 Policy 4.3.3 - Recognising the values of Otago's central business districts				
215.	Queenstown Airport Corporation	122	Amend the policy as follows: "Recognising the values of Otago's central business districts <u>and other economic</u> <u>centres</u> Recognise the values of Otago's central business districts and other economic centres, including as the primary focal point for as providing for the social, cultural and economic activities within community."	Support	Agree with the submitter that central business districts are not the only centres and activity which provide for the economic wellbeing of the community
216.	163 Policy 4.4.1 - Ensuring efficient water allocation and use				
217.	Federated Farmers of New Zealand	115	Amend as follows (or words to similar effect): "Ensure an efficient allocation and use of water by: a) Requiring that the volume of water allocated does not exceed what is necessary for the purpose of reasonable use, including <u>appropriate allowance for reasonable</u> <u>variability in use between practices and</u> <u>seasons;</u> and b) Requiring the development or upgrade of infrastructure that increases use efficiency,	Support	Clause a) has potential to be interpreted tightly and should be rewritten to allow for reasonable seasonal variation in use, and/or allow for reasonable changes between practices as needed. Support clause d) as a potential 'win/win' across the four wellbeings

			where economically feasible; and...		
218.	166 Objective 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised				
219.	Alliance Group, Powernet Ltd, HW Richardson Group Limited, Trustpower Limited, Queenstown Airport Corporation	56, 60, 61, 85, 122	Amend Objective 4.5 as follows: "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".	Support	Agree with the submitter that the reference to enjoyment is vague and subjective, and the objective should relate to the development and use of Otago's natural and physical resources. It should also seek to avoid, remedy or mitigate adverse effects on such resources
220.	301 Introduction to Objective 4.5				
221.	Federated Farmers of New Zealand	115	Amend narrative under Objective 4.5 as follows: "Any use of natural or physical resources significantly contributes to the wellbeing of Otago's communities. However, resource use also has the potential to generate adverse effects. It is important to appropriately manage activities to avoid, individually or cumulatively, degrading the quality of Otago's natural environment. This requires the proactive and integrated management of natural resources, and can only be achieved through the integrated management of Otago's natural resources, and by giving due consideration to both managing adverse effects and maintaining and enhancing environmental values. Resource use can also have adverse	Support	Agree with the submitter that there is a need to better recognise the positive outcomes from resource use.

			effects on other uses or prevent the normal operation of existing uses."		
222.	174 Policy 4.5.7 - Enabling offsetting of indigenous biodiversity				
223.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Amend as follows: "Enable offsetting of adverse effects on indigenous biodiversity values , only when: a) The activities causing those <u>adverse</u> effects have a functional necessity to locate in significant or outstanding areas; and b) Those <u>adverse</u> effects cannot be avoided, remedied or mitigated; and c) Those <u>adverse</u> effects do not result in the loss of irreplaceable or vulnerable biodiversity."	Support	The appropriateness of policy 4.5.7 is questioned: Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection. • Offsetting is considered when effects cannot be avoided remedied or mitigated – it has been used as a form of mitigation and compensation where mitigation is not possible
224.	Queenstown Airport Corporation	118	Amend as follows: "Policy 4.5.7 Enabling offsetting of biodiversity, including indigenous biodiversity Enable offsetting of adverse effects on	Support	Development activities can cause damage or loss to biodiversity in general, rather than just indigenous biodiversity. Clause c) seems to refer to all biodiversity, rather than just indigenous biodiversity, so the intent of the

			biodiversity, including indigenous biodiversity values, only when:..."		policy is not clear.
225.	Environmental Defence Society Incorporated	127	Delete clause (a). • Amend to specify that in some locations avoidance of adverse effects is required. It is not appropriate to provide for remediation, mitigation or offsetting in those locations. • Amend to specify when offsetting is required. For example, subdivision, use and development which [affects] indigenous biodiversity.	Oppose	Strengthening the policy by inclusion of the term 'avoidance' is opposed. If anything, the policy should be amended so that it provides a greater level of flexibility.
226.	175 Policy 4.5.8 - Offsetting for indigenous biodiversity				
227.	Graymont (NZ) Limited	112	Amend (a) as follows: "a) The offset achieves no net loss and <u>where possible</u> preferably a net gain in indigenous biodiversity values; and"	Support	Agree that there is a risk that the policy will not give effect to the RMA as currently drafted and will not enable the social, economic and cultural wellbeing of the community, and will not sustain the potential of the physical resource represented by the submitter's assets in the region for the future. • Under the RMA, economic wellbeing considerations are intertwined with the concept of sustainable management of natural and physical resources
228.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137,	Amend as follows: "Providing for offsetting for from adverse effects on indigenous biodiversity Provide for offsetting for from adverse effects on 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	Support	Support amendment to the policy to recognise that offsetting can be used where there are adverse effects

	Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	138	b) The offset is undertaken close to the location of development , where this will result in the best ecological outcome ; and..."		
229.	177 Roles and responsibilities				
230.	Queenstown Lakes District Council	95	Clarify the intended roles and responsibilities of District and Regional Councils in addressing the concept of community tolerance to risks.	Support	Agree that clarification as to the roles and responsibilities between regional and district councils would be helpful
231.	Queenstown Lakes District Council	95	clarify intended roles and responsibilities for historic heritage.	Support	Agree that clarification as to the roles and responsibilities between regional and district councils would be helpful
232.	180 Method 1.1 - Developing collaboration processes with Kai Tahu				
233.	Federated Farmers of New Zealand Limited	115	Adopt Methods 1.1.1 and 1.1.2 as proposed. • Delete Method 1.1.3	Support	Support Councils developing processes to facilitate effective relationships. The requirement to consult with kai tahu in resource management decision-making and implementation goes beyond what is required
234.	Te Runanga o Moeraki, Kati	154	Amend as follows: "1.1.1 Establish and maintain effective	Oppose	The suggested amendments go further than what is required by the RMA and are too onerous and

	<p>Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga</p>	<p>resource management relationships with papatipu runaka and Kai Tahu, based on a principle of partnership.</p> <p>1.1.2 Use and take into account Iwi Management Plans and other iwi planning documents as a primary tool to:</p> <ul style="list-style-type: none"> • Assist in the identification of issues of resource management significance to Kai Tahu and papatipu runaka. • Provide cultural context and understanding of values underpinning the relationship between Kai Tahu, papatipu runaka and the environment. • Understand, acknowledge and account for the importance of local knowledge and guidance about the environment at papatipu runaka level. • Identify statutory acknowledgements, sites of significance and importance to Kai Tahu and papatipu runaka, and understand why they are important. • Assist in the determination of the nature and extent of consultation that may be required over particular activities or places of importance. • Assist in the development of planning policy. • Assist decision-makers to make an informed decision with respect to a proposal or development of policy. <p>1.1.4 Involve Kai Tahu and papatipu runaka in the plan development process from inception, to ensure values are integrated</p>		<p>specific.</p>
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		<p>and principles of the RMA and Te Tiriti o Waitangi are given effect.</p> <p>1.1.5 Provide papatipu runaka, and where appropriate, Te Runanga o Ngai Tahu with opportunities to participate in the resource consent process as appropriate by:</p> <p>a) notifying and consulting affected papatipu runaka, and where appropriate, Te Runanga o Ngai Tahu on notified resource consent applications which are site-specific, resource-specific or issues of significance to Kai Tahu as identified in iwi management plans and by papatipu runaka.</p> <p>b) ensuring contact details of the district or region's papatipu runaka are maintained, and iwi documents lodged with council by Te Runanga o Ngai Tahu are recorded for applicant use and consultation purposes.</p> <p>c) Encourage applicants to place applications on hold voluntarily to consult with runaka (where appropriate) in an effort to resolve issues at an early stage of proposals.</p> <p>1.1.6 Endeavour to appoint tangata whenua as commissioners on resource consent hearing panels and during plan development processes, particularly when making decisions on issues of resource management significance to Kai Tahu.</p> <p>1.1.7 Seek Cultural Impact Assessment or Cultural Values Assessment as part of an assessment of environmental effects under Schedule 4 of the RMA, where the application is likely to impact on a</p>		
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			significant resource management issue for Kai Tahu."		
235.	181 Method 1.2 - Collaborating with Kai Tahu for value identification				
236.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Amend Method 1.2.1 as follows: "Identify , and protect from inappropriate subdivision, use and development, places, areas or landscapes of cultural, spiritual or traditional significance to them;". • Amend Method 1.2.2 as follows: "Identify, and protect from inappropriate subdivision, use and development, the values that contribute to their significance;". • Add the following methods: "1.2.5 Facilitate efficient and effective processes for applicants to consult Kai Tahu on resource consent applications and private plan change requests.	Support	The suggested amendment reflects the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development
237.	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki,	154	Amend as follows: "1.2 Regional, city and district councils will collaborate with Kai Tahu to:	Oppose	Disagree with the submitter that the method should be amended by increasing its specificity.

	Te Runanga o Otakou and Hokonui Runanga		<p>1.2.5 Use cultural monitoring tools when monitoring the state of the environment.</p> <p>1.2.6 Continue to provide for involvement of Kai Tahu as tangata whenua in decision making processes, including Kai Tahu representation on working parties, technical advisory groups or other forums that warrant representation.</p> <p>1.2.7 Consider providing capacity for Kai Tahu (where parties consider this of mutual benefit) to be involved in studies and research to inform policy development.</p> <p>1.2.8 Encourage and support, where appropriate and when approached (on a case by case basis) the development or review of iwi management plans including the provision of technical advice, administrative support and funding options.</p> <p>1.2.9 Recognise the mana/importance and spirit of intent of statutory acknowledgements and regulations under the Ngai Tahu Claims Settlement Act 1998 (NTCSA) and make provision for their embodiment, beyond their legally recognised expiry date, throughout council policy."</p>		
238.	182 Method 1.3 - Improving knowledge of Kai Tahu's values, rights and interests				
239.	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki,	154	<p>Amend as follows:</p> <p>"1.3 Regional, city and district councils will:</p> <p>1.3.1 Seek opportunities to Assess, improve and demonstrate knowledge of</p>	Oppose	The requested level of specificity is not needed and goes further than what is required under the Act.

	Te Runanga o Otakou and Hokonui Runanga		tikaka and the principles of Te Tiriti o Waitangi among staff and stakeholders and the community."		
240.	183 Method 1.4 - Delegating functions to Kai Tahu				
241.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Delete method 1.4	Support	Unnecessary or ambiguous ("may"). Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
242.	184 Method 2 - Regional, City and District Council Relationships				
243.	Te Runanga o	154	Method 2 should be:	Oppose	The method correctly identifies the local authorities

	Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga		"Regional, City and District Council and Kai Tahu relationships"; • And should include the following method: "Joint or comanagement of a resource(s) between a local authority and iwi authority."		to which it applies and it is incorrect to include Kai Tahu
244.	186 Method 2.2 - Establishing processes to address cross-boundary issues				
245.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Delete method 2.2	Support	Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
246.	187 Method 2.3 - Regional rule for extinguishing existing use rights				
247.	Royalburn Farming	58, 102,	Delete method 2.3	Support	Unnecessary or ambiguous ("may").

	Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138			<ul style="list-style-type: none"> • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
248.	188 Method 3 - Regional Plans				
249.	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	<ul style="list-style-type: none"> • Use and implementation of IMPs. • Address concern over 35 year consents. <p>Freshwater:</p> <ul style="list-style-type: none"> • Beds and margins of waterways: <p>Coastal water values:</p> <ul style="list-style-type: none"> • Recognise provisions in NZCPS for restoring natural character of [the] coastal environment. 	Oppose	Disagree that the method's complexity and specificity should be increased, particularly where the suggested amendments go beyond the requirements of the RMA.

			<ul style="list-style-type: none"> • Advocate for and promote mechanisms and measures that protect natural character of [the] coastal environment, including Kai Tahu efforts to protect resources of the coastal environment through the use of customary management tools such as rahui, mataitai and taiapure. • Recognise importance of CMA Statutory Acknowledgements beyond the expiry dates as per the Ngai Tahu Claims Settlement (Resource Management Consent Notification) Regulations 1999. • Recognise integrated community groups who may develop community-led coastal strategies • Engage with Kai Tahu to identify coastal areas of significance and ways to protect Kai Tahu values in those areas. This process will be assisted by use of cultural monitoring tools, iwi management plans, and use of customary fisheries management tools. <p>Natural hazards: Add specific methods for management of natural hazards</p> <p>Soils</p> <ul style="list-style-type: none"> • Identify Kai Tahu cultural values in relation to soil for inclusion in regional plans, through engagement with Kai Tahu and use of iwi management plans. • Will ensure information sharing with Kai Tahu regarding the location of contaminated 		
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			<p>sites, proposed land use changes and remediation or mitigation work.</p> <ul style="list-style-type: none"> • Will use cultural monitoring tools developed by Kai Tahu to monitor effectiveness of these policies. • Should promote land use practices that maintain and improve soil quality. <p>Biodiversity</p> <ul style="list-style-type: none"> • Local authorities will engage with Kai Tahu and use iwi management plans to identify areas, habitats, species and ecosystems of particular significance to Kai Tahu and to protect them in a manner consistent with Kai Tahu cultural values and principles. <p>Landscapes</p> <ul style="list-style-type: none"> • Set objectives, policies or methods in relevant regional and district plans to protect outstanding natural features and landscapes (including cultural landscapes) from inappropriate subdivision, use and development, and avoid, remedy or mitigate adverse effects of subdivision use and development on outstanding natural features and landscapes. 		
250.	189 Method 3.1 - Developing regional plans				
251.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133,	Amend Method 3.1.4 f) as follows: "f) Identifying, and protecting from inappropriate subdivision, use and development, historic heritage places or , areas or landscapes located in the beds of rivers, lakes and wetlands or the coastal marine area;"	Support	Amendment to reflect the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.

	Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	134, 135, 136, 137, 138			
252.	192 Method 4 - City and District Plans				
253.	AgResearch Ltd	116	Add new method: "City or district plans may implement Policies 2.1.5, 2.2.15, 3.8.3 and 4.3.1 by establishing provisions for rural areas that: (a) restrict subdivision, use and development of highly valued soil resources for future use by rural production activities (unless required for a rural activity that has a functional need to locate in rural areas); and (b) avoid reverse sensitivity effects between incompatible activities."	Oppose	Oppose the addition of greater level of specificity and direction, particularly when this goes beyond the requirements of the RMA.
254.	193 Method 4.1 - Developing district plans				
255.	Royalburn Farming	58, 102,	Delete method 4.1.12	Support	It is questioned whether urban growth is a regional

	Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138			issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level. • There would be significant inefficiencies in detailing growth boundaries in an RPS: • A private plan change cannot apply to change an RPS. • The RPS may not adapt quickly enough to accommodate growth. • Inconsistency with the glossary which states that urban growth areas are as defined in District Plans.
256.	Dunedin City Council	156	Delete method 4.1.11	Support	Councils are unable to protect important sites, or facilitate Kai Tahu access to them, through the District Plan.
257.	194 Method 4.2 - Implementing district plans				
258.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm,	58, 102, 103, 104, 105, 106, 107, 108, 109, 129,	Delete Methods 4.2.2, 4.2.4, 4.2.6 & 4.2.7	Support	Efficiency gains in removing unnecessary provisions. • Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS. • Unnecessary or ambiguous ("may").

	RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	130, 131, 132, 133, 134, 135, 136, 137, 138			
259.	196 Method 5 - Regional Policy Statement				
260.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Delete method		<ul style="list-style-type: none"> • The section 32 analysis supporting urban growth boundaries is inadequate. • It is questioned whether urban growth is a regional issue, as Otago territorial authorities do not have complex cross boundary issues with respect to urban areas. It is not appropriate for the regional council to become embroiled in urban growth management at a local level. • The rationale for “10 years” of supply for urban growth is unclear: it is inconsistent with case law, it is uncertain that 10 years of capacity would be sufficient, and unclear how it should be measured. It

	Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd				would be more useful to require studies of demand for land across various sectors and of the zoning necessary to prevent significant supply shortages. • There would be significant inefficiencies in detailing growth boundaries in an RPS: • A private plan change cannot apply to change an RPS.
261.	198 Method 6.1 - Identification of important resources				
262.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd,	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Amend Method 6.1.2 as follows: "Regional, city and district councils, in their areas of responsibility, will identify: ... d) Special amenity landscapes; ... <u>g) Regionally significant soil resources;</u> <u>h) Significant infrastructure;</u> "	Support	Concerned about introducing the term of Special Amenity Landscapes. • Risk of different criteria being used in current or proposed district plans, and hence, of slowing down forthcoming district plan reviews. • Most of Queenstown Lakes areas that are not Outstanding Natural Landscapes could fall within this category. Too high a level of protection could have adverse effects on the economic and social wellbeing of communities. • Significant infrastructure should be defined, recognised and provided for.

	Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd				
263.	203 Method 7 - Strategies and Plans (non-RMA)				
264.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Delete method 7	Support	<ul style="list-style-type: none"> ◦ Unnecessary or ambiguous ("may"). ◦ Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
265.	206 Method 7.3 - Regional Land Transport Plan				

266.	Environment Southland	32	Add a new method: Method 7.3.5 - Identifying the region's National[ly] and Regionally important transport infrastructure within the Regional Land Transport Plan .	Support	Support ensuring that the Regional Land Transport Plan identifies the region's Nationally or Regionally significant infrastructure.
267.	211 Method 8.1.1 - Information from regional, district and city councils - optional				
268.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Delete method	Support	Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
269.	214 Method 8.1.4 - Information from city and district councils - optional				
270.	Royalburn Farming	58, 102,	Delete method	Support	Unnecessary or ambiguous ("may").

	Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138			<ul style="list-style-type: none"> Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
271.	215 Method 9 - Funding				
272.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135,	Delete method	Support	Unnecessary or ambiguous ("may"). <ul style="list-style-type: none"> Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.

	Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	136, 137, 138			
273.	220 Methods 11.1.2 & 11.1.3 - Promotion by regional, city and district councils - optional				
274.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Delete method	Support	Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.

	Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd				
275.	223 Method 11.2.1 - Facilitation by regional, city and district councils - compulsory				
276.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties,	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Amend d) as follows: "d) Facilitate coordination between lifeline utilities <u>significant infrastructure and</u> <u>significant community</u> facilities used for emergency management, including by: i) Recognising the interconnections between <u>significant infrastructure</u> lifeline utilities ;..."	Support	The suggested terminology better reflect the terminology used in the RMA.

	Henley Downs Farm Holdings Ltd, Real Journeys Ltd				
277.	225 Method 11.2.3 - Facilitation by regional, city and district councils - optional				
278.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Delete method	Support	Unnecessary or ambiguous ("may"). • Deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.
279.	248 Appendices - general				
280.	Royalburn Farming Company Limited, Walter Peak Station,	58, 102, 103, 104, 105, 106,	Delete Appendix 1. • Delete Appendix 2 or amend to identify the principles of the Treaty of Waitangi that	Support	Agree with the submitter that the provisions duplicate the RMA or other statutory documents, including any provision stated in the RMA

	Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	are to be applied when giving effect to the Otago RPS.		(provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; and • Is not required by RMA S62 or is not an active directive
281.	249 Glossary				
282.	Queenstown Lakes District Council	95	Define "primary production	Support	Agree that if the term 'primary production' is used it should be defined.
283.	Forest and Bird NZ	98	Add new definitions: • "Biodiversity Offsets Measurable conservation outcomes resulting from actions designed to compensate for residual adverse biodiversity impacts arising from project development after appropriate avoidance, minimisation, remediation and mitigation measures	Oppose	Oppose the addition of complexity and increased specificity.

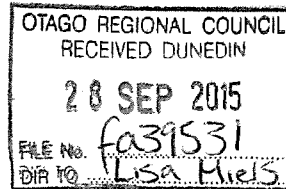
			<p>have been taken. The goal of biodiversity offsets is to achieve no net loss and preferably a net gain of biodiversity on the ground."</p> <ul style="list-style-type: none"> • "No net loss <p>Means no net loss with respect to:</p> <ul style="list-style-type: none"> • Species abundance, population structure, and composition (e.g. individual species or species groups) • Habitat structure (e.g. vegetation tiers, vegetation pattern) • Ecosystem function (e.g. nutrient cycling rates) • People's use of and cultural values associated with biodiversity (e.g. particularly valued habitats or species). <p>No net loss, in essence, refers to the point at which biodiversity gains from targeted biodiversity management activities match the losses of biodiversity due to the impacts of a specific development project, so that there is no net reduction in the type, amount and condition (quality) of biodiversity. A net gain means that biodiversity gains exceed a specific set of losses associated with a development."</p>		
284.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131,	<p>Add the following definitions:</p> <ul style="list-style-type: none"> • Significant infrastructure - include lifeline utilities and any infrastructure considered to be of regional or national significance; • Significant Community Facility - include 	Support	Support the increase in clarification and reduction in ambiguity

	Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	132, 133, 134, 135, 136, 137, 138	<p>facilities that provide essential community services;</p> <ul style="list-style-type: none"> ◦ Urban; ◦ Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS; ◦ Regionally Significant Industry Activity - include any activity associated with tourism or primary production; ◦ Hard mitigation measures; ◦ Amend definition of Kai Tahu to clarify if has the same or different meaning as "Ngai Tahu", having particular regard to the Ngai Tahu Claims Settlement Act 1998 and other planning documents outside Otago. 		
285.	Environmental Defence Society Incorporated	127	<p>Define biodiversity offset (this definition is from the proposed NPS for indigenous biodiversity):</p> <p>"Measureable conservation outcomes resulting from actions which are designed to compensate for more than minor residual adverse effects on biodiversity, where those effects arise from an activity after appropriate prevention and mitigation measures have been taken. The goal of biodiversity offsets is to achieve no net loss and preferably a net gain of biodiversity on the ground with respect to species composition, habitat structure and</p>	Oppose	Oppose the added complexity and repetition of other documents

			ecosystem functions."		
286.	250 Glossary of Te Reo terms				
287.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Dampier Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	58, 102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Delete and include these terms in the Glossary.	Support	Support reduction in complexity and agree that it is unnecessary to have two separate glossaries
288.	256 Miscellaneous (e.g. unnecessary sections etc.)				
289.	Royalburn Farming Company Limited, Walter Peak Station, Millbrook Country Club, Eastburn Farm,	58, 102, 103, 104, 105, 106, 107, 108, 109, 129,	Delete or amend text that: <ul style="list-style-type: none"> • Is duplicated; • Is vague or ambiguous; • Duplicates the RMA or other statutory documents, including any provision stated in 	Support	Efficiency gains in removing unnecessary provisions. <ul style="list-style-type: none"> • Deleting unnecessary provisions would provide clearer direction and strengthen the PRPS. • "Need" statements are not required by RMA S62

	RCL Queenstown PTY Ltd, Damper Bay Estates, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Ski Field Ltd, Northlake Investments Ltd, Shotover Country Ltd, Ayrburn Farm Developments Ltd, Bridesdale Farm Developments Ltd, Glencoe Station Ltd, Treble Cone Investment Ltd, Woodlot Properties, Henley Downs Farm Holdings Ltd, Real Journeys Ltd	130, 131, 132, 133, 134, 135, 136, 137, 138	the RMA (provisions should be referenced but not quoted), and any definition already in the RMA or other legislation; • Is not required by RMA S62 or is not an active directive; and • Delete all "need" statements.		or is not an active directive.
290.	Structure of the document & useability - general				
291.	Queenstown Lakes District Council	95	Reduce repetition of objectives and policies to create a more streamlined document.	Support	Support changes that reduce repetition

28 September 2015



The Hearings Panel
Otago Regional Council
70 Stafford Street
Private Bag 1954
DUNEDIN 9054

ATTENTION: Ralph Henderson / Sarah Valk

PROPOSED OTAGO REGIONAL POLICY STATEMENT – FURTHER SUBMISSION

Please find **attached** the Environmental Defence Society's (**EDS**) further submission on the proposed Regional Policy Statement (**PRPS**). We acknowledge that the final date for filing of further submissions was Friday 25 September 2015 and that our further submission is 1 working day late.

Due to prior commitments EDS's legal advisor was out of the office for most of the two weeks between receiving the summary of decisions and the filing date for further submissions, attending Land and Water Forum meetings and the Resource Management Law Association conference. EDS is a small not-for-profit organisation. Our resources are extremely limited and we are currently working at full capacity. Unfortunately there was no other person available to complete the further submission by the due date.

We apologise for any inconvenience in the delay in filing. As the delay is 1 working day only we do not consider that any other party will be adversely affected or that the process will be unreasonably delayed. EDS advised Mr Ralph Henderson of the Council of the likely delay and we understand he holds a similar view.

We respectfully request that Hearings Panel waive the filing deadline in this instance.

Yours Sincerely

Madeleine C Wright
Solicitor
Environmental Defence Society

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FURTHER SUBMISSION ON THE PROPOSED OTAGO REGIONAL POLICY STATEMENT

TO: Otago Regional Council
70 Stafford Street
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FROM: Environmental Defence Society Incorporated
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09 480 2565 / 027 468 7778

DATE: 27 September 2015

1. The Environmental Defence Society (**EDS**) has an interest in the proposal that is greater than the interest the general public has. EDS is a not-for-profit national environmental advocacy group. EDS was established in 1971 with the objective of bringing together the disciplines of law, science and planning to advocate for better environmental outcomes in resource management matters. EDS has been active in assessing the effectiveness of the Resource Management Act 1991 (**RMA**) and statutory planning documents in addressing key environmental issues such as landscape protection, coastal management and water quality. EDS lodged a submission on the proposed Otago Regional Policy Statement (**PRPS**). EDS could not gain an advantage in trade competition through this further submission. EDS wishes to be heard in support of this further submission and would be prepared to consider presenting its further submission in a joint case with others making a similar further submission at any hearing.
2. This further submission is structured by provisions. The following abbreviations are used:
 - Central Otago Environmental Society (**COES**)
 - Director-General of Conservation (**DGC**)
 - Federated Farmers of New Zealand (**Federated Farmers**)
 - Fonterra Co-operative Group Limited (**Fonterra**)
 - Guardians of Lake Wanaka and Lake Hawea (**GLWLH**)
 - New Zealand Petroleum and Minerals (**NZPM**)
 - Otago and Central South Island Fish and Game Councils (**Fish and Game**)
 - Transpower New Zealand Limited (**Transpower**)
 - Upper Clutha Conservation Task Force (**UCCT**)

- Yellow-eyed Penguin Trust (YEPT)

Submitter	Submission point	Position
Whole RPS (overall approach)		
YEPT	63	<p>Support.</p> <p>The precautionary approach is a tool used by decision makers when facing situations with high potential impact and inadequate information. Situations of this type arise across the environment and not just in relation to natural hazards. P3 NZCPS recognises this and provides for the use of the precautionary approach in the coastal environment generally. In the biodiversity and ecosystem space, in particular in significant areas, it is appropriate that a precautionary approach is taken given the paucity of information in many situations and the significant impacts (in the most extreme case extinction) that are a real risk.</p>
GLWLH	73	<p>Support.</p> <p>The identification of clear and focused resource management issues for the region is critical. Identified issues drive subsequent provisions. EDS agrees that the list of issues is incomplete and that the focus on four outcomes is inadequate.</p> <p>As the heart of resource management in the area it is extremely important it is easy to follow, and uses clear and unambiguous language. EDS agrees that the PRPS needs to drill down into each significant issue and provide specific and</p>

		measurable targets.
NZPM	86	<p>Oppose in part.</p> <p>The <i>EDS v King Salmon</i> decision clarified that avoid means to not allow or prevent the occurrence of. In the context of P13 and P15 NZCPS avoidance of adverse effects of inappropriate subdivision use and development is required. This is a clear directive that, if used in higher order documents like the RMA, NZCPS or NPSFM, the PRPS must given effect to. This directive is applied in the context of New Zealand's and Otago's outstanding and significant areas. It is appropriate these areas are subject to a high level of protection. This will not necessarily prevent all development. The level of restriction will turn on what is considered appropriate in the specific area.</p> <p>The final bullet in the summary of decisions synopsis of the submission does not make sense. If a development is found to be appropriate then it is an appropriate resource management outcome. If it is not then it is not.</p>
Fonterra	99	<p>Support in part.</p> <p>The PRPS is required to identify the significant resource management issues for the region, and then to formulate objectives, policies and methods to respond to and address these issues. As notified the PRPS fails to do this for key resources. EDS agrees that the PRPS lacks clear issues, objectives, policies and methods.</p>

		<p>Oppose in part.</p> <p>Fonterra seeks that special provision is made for dairy as a regionally significant industry, and considers that there is an imbalance in the emphasis placed on environmental protection vs economic wellbeing. This is opposed. First, dairy has significant adverse effects on the natural environment, for example in the water quality space. It is appropriate that as an activity it is subject to regulation. All businesses, including farming, face costs and choices¹. Second, this stark dichotomy fails to recognise that positive environmental outcomes are in fact part and parcel of economic wellbeing.</p>
Federated Farmers	115	<p>Oppose in part.</p> <p>The submission states that a region rich in economic, social and cultural terms is more able to deliver good environmental outcomes. This is also true in the converse. Positive environmental outcomes are in fact part and parcel of economic wellbeing. Both sides of the coin need to be reflected.</p>
Fish and Game	118	<p>Support.</p> <p>S62 RMA requires the PRPS to identify significant resource management issues for the region. As notified the PRPS fails to fulfil this requirement.</p>
Regionally Significant Issues		
Forest and Bird	98	<p>Support.</p> <p>As above.</p>
UCCT	144	Support.

¹ *Day v Manawatu District Council* [2012] NZEnvC 182 at [5-176].

		S62 RMA requires the PRPS to identify significant resource management issues for the region. As notified the PRPS fails to fulfil this requirement. Biodiversity loss and water quality degradation are key issues faced by the region.
Introduction RPS Framework		
Fish and Game	118	Support. The proposed amendments ensure that the PRPS adequately takes into account Part 2 RMA.
Chapter B2 – general requests		
Forest and Bird	98	Support. Pursuant to s5(2) RMA safeguarding the life-supporting capacity of air, water, soil and ecosystems is an environmental bottom line. This should be recognised and provided for in the PRPS.
Fonterra	99	Oppose in part. EDS agrees that amenity (second tier) landscapes should not be subject to the same level of protection as outstanding landscapes. However, EDS opposes the suggestion that significant adverse effects on those areas can be avoided remedied or mitigated. The RMA and the NZCPS apply a hierarchy of landscape protection. This requires avoidance of significant adverse effects on amenity landscapes and then applies the mitigation hierarchy to other adverse effects.
Forest and Bird	98	Support. S62 RMA requires the PRPS to identify significant resource management issues for the region. As notified the PRPS fails to fulfil this requirement.

DGC	117	Support. Otago's biodiversity is in a state of decline. It is appropriate this is recognised and addressed in the PRPS.
Policy suite 2.1		
Forest and Bird	98	Support. Degradation and overallocation are key issues which the PRPS must address in order to give effect to the NPSFM.
Federated Farmers	115	Oppose. Freshwater values are not only recognised and provided for in order to provide for economic and social wellbeing. They must also reflect environmental outcomes. Ecosystem health is a mandatory value under the NPSFM. Positive environmental outcomes in fact contribute to economic prosperity.
Fish and Game	118	Support. The PRPS must give effect to the NPSFM.
Policy 2.1.2		
Forest and Bird	98	Support. A goal of maintenance and enhancement where degraded is consistent with the RMA and NPSFM.
Fish and Game	118	Support. As above.
DGC	117	Support. As above.
Policy 2.1.6		
Forest and Bird	98	Support. The amendments sought help to clarify the course of action required to achieve the goal identified in the objective (and in fact in the policy due to the lack of distinction throughout

		the PRPS between objectives (goals) and policies (courses of action)). A clear direction towards management , and identifying management techniques , is critical to assessing how to achieve protection, maintenance or enhancement.
Federated Farmers	115	<p>Oppose.</p> <p>Links between existing ecosystems to create ecological corridors, and buffering between ecological areas and high impact areas or activities, are both important tools in managing ecosystem and biodiversity values and ensuring positive outcomes. This should not be deleted.</p> <p>A policy 'encouraging' management is insufficiently directive. Biodiversity of important to kai tahu should be protected and managed. This is in accordance with Part 2 RMA.</p>
DGC	117	<p>Support.</p> <p>The proposed amendment helps to direct and clarify the policy, ensuring it is clear that all environments are caught by the provision.</p>
Fish and Game		<p>Support.</p> <p>It is important that the policy clearly identify what is to be managed and how. Cumulative effects have a significant impact on biodiversity and ecosystem health. Under the RMA they must be considered. (See definition of effects 3 RMA).</p>
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	<p>Support.</p> <p>As identified in EDS's submission there are significant gaps in the PRPS policies. This</p>

		fails to identify a clear <u>course of action</u> to achieve identified biodiversity and ecosystem outcomes. The PRPS will be the 'heart of resource management in the region' and once finalised, will provide the back bone for developing lower order planning documents ² . It is critical it provides a clear, directive and comprehensive policy framework. The additional policies proposed go towards addressing this issue.
Policy 2.1.7		
Meridian	82	Oppose in part. EDS disagrees that the reference to the coastal environment is redundant. Identification of the coastal environment is an extremely difficult task. The coastal environment comprises of many parts that are not necessarily captured by the term 'seascape'. The reference to coastal environment should be retained. (See P1 NZCPS).
Schedule 4		
Surf protection society	139	Support. EDS agrees that it should be clarified that natural character areas are to be identified. It is preferable that these areas are mapped. This is consistent with s6 RMA and P13 NZCPS.
Objective 2.2		
DGC	117	Support. Identifying the reasons for identification, protection or enhancement clarifies the intent of the objective.
Introduction Objective 2.2		
Forest and Bird	98	Support. Identifying the reasons for

² *Appealing Wanaka Limited v QLDC* [2015] NZEnvC 139

		identification, protection or enhancement clarifies the intent of the objective. It is important for the PRPS to identify a classification methodology to ensure there is a regionally uniform process for identification.
Policy 2.2		
Forest and bird	98	Support. EDS agree that the most effective method of managing freshwater bodies is to identify and map these. This activity is often undertaken by sectors themselves which could be used to assist in the council building its capacity to undertake this task.
Policy 2.2.1		
Forest and Bird	98	Support. EDS agrees that significant sites should include freshwater and coastal habitat. The RMA does not limit the protection of significant areas of indigenous fauna to terrestrial sites.
DGC	117	Support. As above.
Schedule 5		
DGC	117	Support. Agree that significant sites should include freshwater and coastal habitat. The RMA does not limit the protection of significant areas of indigenous fauna to terrestrial sites. It is appropriate to provide specific assessment criteria for the marine area.
Policy 2.2.2		
Contact Energy	74	Oppose. It is not appropriate that the mitigation hierarchy is applied to significant areas. It is appropriate, and consistent

		with s6 RMA and P11 NZCPS, to require avoidance of adverse effects in these areas. A requirement to 'avoid' is a clear directive meaning to prevent the occurrence of or not allow. The application of the mitigation hierarchy is neither available nor appropriate.
Trustpower	85	Oppose. As above.
NZPM	86	Oppose. As above.
Transpower	97	Oppose. As above.
Forest and Bird	98	Support. The protection of significant areas is a matter of national importance. It is appropriate that the PRPS require avoidance of adverse effects on these areas. Mapping is a difficult and extensive exercise. It is likely that some areas that qualify as significant will not be identified during the mapping exercise. Other areas, which at the time of mapping may not qualify as significant, may also over time meet that threshold. Case law has confirmed that outstanding/significant areas can be identified as such even if not expressly identified in a plan which has otherwise mapped these areas. It is appropriate that the PRPS provide for the opportunity to identify sites that meet the criteria at the time of consent application. Pest plants, for example wilding pines, are a significant issue in native areas. It is important

		they are controlled.
Alliance Group	56	<p>Oppose.</p> <p>The protection of outstanding features and landscapes is a matter of national importance. P13 and P15 NZCPS require that in outstanding areas in the coastal environment protection requires the avoidance of adverse effects. There is no reason why this level of protection should not apply to outstanding areas outside the coastal environment. The PRPS is required to give effect to the NZCPS and to be developed in accordance with Part 2 RMA. It is appropriate that adverse effects are avoided in outstanding areas.</p>
Contact Energy	74	<p>Oppose.</p> <p>As above.</p>
Trustpower	85	<p>Oppose.</p> <p>As above.</p>
NZPM	86	<p>Oppose.</p> <p>As above.</p>
Transpower	97	<p>Oppose.</p> <p>As above.</p>
Federated Farmers	115	<p>Oppose.</p> <p>As above.</p>
Policy 2.2.6		
Contact Energy	74	<p>Oppose.</p> <p>The RMA and the NZCPS envisage a hierarchy of landscapes with a corresponding hierarchy of protection. In the case of outstanding areas avoidance of adverse effects is required. As the second tier of landscapes it is appropriate that in amenity landscapes significant adverse effects are avoided, and other adverse effects subject to the</p>

		mitigation hierarchy.
Trustpower	85	Oppose. As above.
NZPM	86	Oppose. As above.
Fonterra	99	Support. As above.
Aurora Energy Limited	76	Oppose. P13 NZCPS directs that adverse effects on areas with outstanding natural character are to be avoided. The PRPS is required to give effect to (implement) the NZCPS. It is appropriate that the PRPS require the avoidance of adverse effects on outstanding natural character areas.
Transpower	97	Oppose. As above.
Policy 2.2.10		
Surfbreak Protection Society	139	Support. Otago has many of New Zealand's most unique surf spots. At regional policy statement level outstanding landscapes are most appropriately identified at a regional scale. ³ There is equivalent divergence in outstanding surf breaks around the country as with outstanding areas generally. It is appropriate that significant surf breaks are also identified and protected on a regional scale.
Policy 2.2.12.		
DCG	117	Support. The proposed amendment clarifies that all wetlands should be mapped and protected. The NPSFM directs

³ See *Man O'War Station v Auckland Council* [2015] NZHC 767.

		that the “significant values of wetlands” are to be protected. This is not limited to outstanding wetlands. This reflects that fact that as a result of the significant decline in wetlands nationally (approximately only 10% remaining pre-European settlement), all remaining wetlands are in fact significant/outstanding.
Fish and Game	119	Support. The proposed amendment provides clarity and certainty as to the relevant considerations when determining whether a water body should be classified as outstanding.
NZPM	86	Oppose. This policy concerns freshwater areas of the highest value. The protection of wetlands outstanding waterbodies is an environmental bottom line (Ob A2). It is not appropriate to provide for and rely on the mitigation hierarchy in these areas. Instead adverse effects should be avoided.
Transpower	97	Oppose. As above.
Federated Farmers	115	Oppose in part. The submission seeks that ‘avoid’ is deleted from clause (b). Avoidance is the first step in the mitigation hierarchy. It is should be the first and preferred option when dealing with residual adverse effects (those effects where avoidance is not required). Only if avoidance is not possible should movement down the mitigation hierarchy occur. This is not unnecessarily punitive, but rather the

		response framework set out in s5 RMA.
Straterra	151	<p>Oppose.</p> <p>This policy concerns freshwater areas of the highest value. The protection of outstanding waterbodies and wetlands is an environmental bottom line (Ob A2). It is not appropriate to provide for and rely on the mitigation hierarchy in these areas. Instead adverse effects should be avoided.</p>
Objective 2.3		
DCG	117	<p>Support.</p> <p>The proposed amendment more clearly links the objective to the following policies.</p>
Fish and Game	118	<p>Support.</p> <p>A goal of restoring as well as sustaining natural systems is supported. This aligns with the the RMA and national policy statements which seek to not only maintain or sustain, but to improve and enhance. Restoration is a key tool in achieving improvement and enhancement.</p>
Policy 2.3.3		
Fonterra	99	<p>Support in part.</p> <p>EDS agrees that the PRPS must identify the NPSFM framework for water management of developing objectives and limits/targets. However, this should not be in replacement of a policy seeking to use consistent objectives across interconnected waterways, but rather in conjunction with this goal.</p> <p>Oppose in part.</p> <p>The proposed amendments seek to insert a requirement to</p>

		maintain or enhance overall <u>values</u> . This amendment is unclear and unnecessary.
Fish and Game	118	Support. Although common objectives between interconnected bodies are positive (and supported) in terms of achieving coherent management across the region the proposed amendment helps to prevent perverse outcomes where by quality and effects on one catchment are masked by those in another.
Issue 4.5		
Forest and Bird	75	Support. EDS agrees (and identified in its submission) that Otago's biodiversity and ecosystems are under serious threat. The human use of the region's resource is a key driver of degradation. It is appropriate this is identified as an issue.
Fish and Game	98	Support. Biodiversity refers to the combination of organisms within an ecosystem. An ecosystem itself is the biological community of interacting organisms and the physical environment in which they exist. It focuses on the interaction and interrelationship of organisms as opposed to its individual components. The importance of ecosystems and their protection is identified in s5 RMA as an environmental bottom line. It is appropriate that the threats to and the protection of ecosystem health is identified.
Need 4.5		
Fish and Game	98	Support. As above.

Policy suite 4.3		
Forest and Bird	75	<p>Support.</p> <p>EDS agrees that the PRPS needs to be reviewed and amended to include more focused and nuanced set of issues, objectives and policies addressing <i>inter alia</i> land use activities in the region, their undertaking and continuation, and ensuring the sustainability and protection of the environment in doing so.</p>
Policy 4.3.2		
Fish and Game	118	<p>Support.</p> <p>Interpretation of a direction to 'minimise' is subjective. The application of the mitigation hierarchy clearly identifies how tussock grasslands are to be managed and is consistent with the RMA.</p>
Straterra	151	<p>Support in part.</p> <p>As above.</p>
Objective 4.4		
DCG	117	<p>Support.</p> <p>The amendment clarifies that resource use needs to be sustainable and that provision of economic use and development is subject to the environmental bottom lines in s5 RMA.</p>
Policy 4.4.1		
Fonterra	99	<p>Oppose.</p> <p>The submission has the potential to be interpreted to place regionally significant industry in a position of special exemption. Regionally significant industry should not be able to intensify unimpeded. Intensification will affect water quantity and water quality (as well as other elements of the environment). Any decision to</p>

		invest in and pursue water infrastructure (for example dams) cannot be viewed in isolation from water quality and the effects of intensification associated with increase access to water. Water limits/targets must be achieved. These embody the wider economic and social benefit of healthy waterways.
Policy 4.4.3		
Federated Farmers	115	Oppose. The policy simply seeks that enhancement is encouraged. There is no need to limit this to activities which significantly contribute to enhancement.
DCG	117	Support. The proposed amendments focus the policy and are also consistent with P21 NZCPS. ⁴
Policy 4.5.1		
Federated Farmers	115	Oppose. It is appropriate that discharges are addressed under the PRPS. ⁵ S15 RMA expressly prohibits discharges unless authorised in one of the ways provided for. There is no exemption to this requirement for stock discharges to land. As a result, these must be addressed in planning documents and authorisation required. As the heart of resource management in the region the PRPS sets the foundation for management of stock discharges.
Policy 4.5.7		
GLWGLH	73	Support. A goal of no-net-loss (and preferably of net-gain) is a key

⁴ EDS still holds the concerns raised in its original submission.

⁵ EDS considers that a restructuring of the PRPS to identify and include significant issues and objectives which lead into this policy would anchor and provide justification for the policy.

		component of biodiversity offsetting.
Forest and Bird	98	<p>Support.</p> <p>If location of an activity in an high value area is unavoidable (circumstances where this is available will be extremely limited) the effects of that activity should be offset.</p> <p>EDS agrees that in order to maintain indigenous biodiversity (s30 RMA) that offsetting should be enabled in all areas.</p> <p>There are instances, such as when the specific area in question includes irreplaceable or vulnerable organisms, where offsetting will not be appropriate because the loss of those values cannot in fact be offset.</p>
Holcim NZ Limited	92	<p>Oppose in part.</p> <p>The amendment seeks to provide an ability to offset biodiversity loss in outstanding/high value areas for regionally and nationally significant activities. This in effect creates an extremely broad exemption to the avoidance requirement for a huge number of activities. It is not appropriate that such an exemption is provided for all activities in every circumstance. These activities should still be required to avoid these areas (and not simply recourse to offsetting) unless it is imperative they are located there.</p>
DCG	117	<p>Support in principle.</p> <p>EDS agree that criteria are required to encapsulate best practise off-setting principles.</p>

Straterra	151	<p>Oppose.</p> <p>The regional council is tasked with maintaining indigenous biodiversity. As the heart of resource management in the region it is important the PRPS set out the framework for biodiversity offsetting to ensure that it is consistently undertaken across the region.</p>
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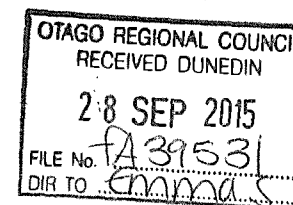


FURTHER SUBMISSION FORM (Print clearly on both sides)

Proposed Regional Policy Statement for Otago

(Form 6, Clause 8 of the First Schedule, Resource Management Act 1991)

RECEIVED 1038
25/9/15



Office use only

Name of further submitter:

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I wish do not wish (circle preference) to be heard in support of my further submission.

If others make a similar submission, I will /will not consider presenting jointly with them at a hearing (circle preference).

Tick as appropriate:

☐ I represent a relevant aspect of the public interest.

☒ I have an interest in the proposal greater than the interest that the general public has.

Signature: G. F. Dowling Date: 24.9.15

(of further submitter, or person authorised to sign on their behalf).

Important note to submitter:

1. A copy of your further submission must be served on the original submitter within five working days of making the further submission.
2. All further submissions are made available for public inspection.

SUBMISSIONS MUST BE RECEIVED BY 5.00 PM,
FRIDAY 25 SEPTEMBER 2015



Send to:
Freepost ORC 497
Otago Regional Council
Private Bag 1954
Dunedin 9054

Please turn over

479 0015

Address for Service: Sue Maturin; Box 6230, Dunedin 9010, 03 477 9677

Please Note that the table is a cut and paste and due to the length of some submitters requests not all the column has reproduced, although the row width can be dragged to see the full submission point. Forest and Bird's Further submissions either supports or opposes the submitters full submission point.

Name	Number	Position	Submitters Decision Requested	F&B Position	F&B Reasons
6 Schedule 3 - Significance threshold					
Central Otago District Council	37	Amend	Delete Schedule 3.	Support	Schedule 3 in effect creates a defacto rule and the shedule does not include all relevant matters for determining significance threshold
265 Outcome 2 and introduction					
Queenstown Lakes District Council	95	Amend	Introduction to Chapter 2: Greater emphasis on natural values and ecosystem services.	Support	More recognition should also be given to the intrinsic values of ecosystems and their protection. The outcome is inconsistent with Part II of the RMA, which provides for sustainability and protection of natural resources, which may conflict with the economic value placed on resources.
Wise Response Society Inc.	114	Support	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 subsets of the biosphere or ecosystem rather than leading straight in on economic drivers. • Amend 1st sentence as follows: "Otago's future is <u>currently</u> driven by three sectors. etc."	Support	More recognition should also be given to the intrinsic values of ecosystems and their protection. The outcome is inconsistent with Part II of the RMA, which provides for sustainability and protection of natural resources, which may conflict with the economic value placed on resources.
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.	Support	More recognition should also be given to the intrinsic values of ecosystems and their protection. The outcome is inconsistent with Part II of the RMA, which provides for sustainability and protection of natural resources, which may conflict with the economic value placed on resources.
29 Objective 2.1 - The values of nature					
Real Journeys	138	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 not protected from inappropriate subdivision</u> , use and development—maintained and enhanced."	Oppose	Part 11 RMA is not restricted to recognition of regionally significant values.
269 Introduction to Objective 2.1					
Fonterra Co-operative Group Limited	99	Amend	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 identifies the values that apply attached to our resources, and identifies those which need protection and the objectives that are sought to be met in respect of those values. Once identified, it is acknowledged that the values and objectives that apply to individual natural and physical resources may conflict with each other - example, we depend on water for food production, yet we want water for healthy rivers. A good quality resource management framework will take an integrated approach that attempts to balance competing values (and objectives) rather than preferring some at the exclusion of others."	Oppose	A good quality resource management framework, promotes sustainable management, safeguards the life supporting capacity of ecosystems and maintains indigenous biodiversity.
31 Policy 2.1.1 - Managing for freshwater values					

Wise Response Society Inc.	114	Amend	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 a quifers, and rivers, lakes, wetlands, and the ir margins; and b) <u>Enhance hydrological systems and services, by actively</u> <u>promoting land management that retains and improves</u> <u>moisture capture, natural infiltration, soil moisture holding</u> <u>capacity and deep percolation; and</u> b/c) <u>Sub</u> Retain the range and extent of habitats provided by freshwater; and c/d) <u>Provide additional protection to significant and</u> Protect outstanding water bodies and wetlands; and d/e) <u>Protect migratory patterns of freshwater</u> r-species, unless detrimental to indigenous biodiversity; and e/f) <u>Avoid aquifer compaction, and seawater</u>	Support	Priority for managing freshwater sustainably to ensure the life supporting capacity of ecosystems is the appropriate focus under the RM Act Part II. Otago suffers from water shortages, especially in drought conditions, and some rivers are over allocated, necessitating land management that enhances hydrological systems and services.
37 Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes					
Environmental Defence Society Incorporated	127	Oppose	Delete:	Support	Duplication with schedule 4
38 Schedule 4 - Criteria for the identification of natural features and landscapes					
Environmental Defence Society Incorporated	127	Amend	EDS supports the criteria however an assessment methodology is required. This should identify that the identification of ONFLS is a three step process comprising: • Identification of the landscape unit boundaries. • Ascertaining whether a landscape is sufficiently natural, acknowledging that there is a spectrum of naturalness and that a landscape does not have to be pristine to be considered natural. • Assessing whether the landscape is outstanding at a regional level, such that it is conspicuous, remarkable and stands out from the rest.	Support	Comprehensive criteria and a 3 step process is required to meet Part 11 RMA.
39 Policy 2.1.8 - Recognising the values of natural features, landscapes and seascapes					
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, at places need merit particular attention when considering use and development and to provide for protection in some circumstances, where appropriate."	Oppose	A good quality RM framework does identify resources which need protection. The RMA and NZ Coastal Policy Statement provides for the adverse impacts of Mineral extraction to be avoided as well as managed.

Wise Response Society Inc.	114	Amend	<p>Policy 2.1.8 <u>Managing the value of the coastal environment.</u> <u>its conservation, sustainability of fisheries and natural character</u> Recognising the values of natural character in the coastal environment Recognise the values of <u>the coastal environment, its conservation, sustainability of fisheries and natural character</u> in the coastal environment are derived from the following attributes <u>and manage the land and coastal environment to sustain or enhance these qualities:</u> a) <u>Sustainable, functioning estuarine and marine ecosystems that are sustainable</u> b) <u>Fish stocks that support a viable commercial fishery and valuable recreational fishery</u> c) Natural elements, processes and patterns; b) d) Biophysical, ecological, geological and geomorphological aspects; c) e) Natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, estuaries, reefs, freshwater springs and surf breaks; d) f) The natural movement of water and sediment; b) d) The natural darkness of the night sky; f) h) <u>Pristine or highly natural places or areas that are wild or scenic and not spoilt by built structures or inappropriate activity</u>; 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."</p>	Support	Sustainability of fisheries contributes to natural character of the coastal environment,
Environmental Defence Society Incorporated	127	Amend	<ul style="list-style-type: none"> • 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.	The criteria align with the NZCPS, and use of criteria add certainty to the RPS.
40 Objective 2.2 - Otago's significant and highly valued natural resources					
Otago and Central South Island Fish and Game Councils	118	Amend	Amend as follows: "Objective 2.2 Otago's significant and highly valued natural resources are identified, and protected or enhanced to maintain their distinctiveness and significance"	Support	It is useful to incorporate the reason in the objective.
42 Policy 2.2.1 - Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna					
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: "Identify areas and values of significant indigenous vegetation and significant habitats of indigenous fauna <u>of terrestrial, freshwater, and marine environments,</u> using the attributes detailed in Schedule 5 <u>and Schedule 5A.</u> "	Support	A consistent regional approach to identifying Section 6 matters is best practice.
43 Schedule 5 - Criteria for the assessment of significant indigenous vegetation and habitat of indigenous fauna					
PauaMAC 5 Incorporated and The Otago Rock Lobster Industry Association Incorporated	80	Amend	Amend the introductory sentences of Schedule 5 to provide that criterion 1, "representativeness", does not apply to the assessment of significance in relation to the CMA.	Oppose	Coastal areas of significant indigenous vegetation and habitats also need to be identified.
Director-General of Conservation	117	Amend	Include the following new schedule 5A:	Support	Better meets Section 6 RMA requirements and NZCPS as has been established through the Environment Court.
46 Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes					
Director-General of Conservation	117	Amend	Amend as follows: "a) Avoiding adverse effects <u>of subdivision, use and development on the characteristics and qualities of these values which contribute to the significance of the natural features, landscapes or seascapes;</u> and b) Avoiding <u>significant adverse effects and avoiding, remedying or mitigating other adverse effects of subdivision, use and development on other values of natural features, landscapes and seascapes; ...</u> "	Support	It is necessary to ensure consistency with NZCPS.

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.	Support	Focus should be on the "outstandingness" not the values which contribute to the significance of the ONFLs.
47 Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features					
Environmental Defence Society Incorporated	127	Support	Retain.	Support	Comprehensive criteria will add clarity to the RPS.
54 Policy 2.2.12 - Identifying outstanding water bodies and wetlands					
Director-General of Conservation	117	Amend	Amend as follows: " Identifying wetlands and outstanding water bodies and wetlands."	Support	Wetlands have been so reduced in extent, and those remaining should all be assessed.
Otago and Central South Island Fish and Game Councils	118	Amend	Amend as follows: "Identify outstanding water bodies and wetlands and their amenity or intrinsic values, using the following criteria: a) A high degree of naturalness; b) Outstanding aesthetic or landscape values; b1) Outstanding amenity or intrinsic values which are afforded by waters in their natural state; b2) Where waters are no longer in their natural state, the amenity or intrinsic values of those waters which in themselves warrant protection because they are considered outstanding; b3) Outstanding habitat for terrestrial or aquatic organisms. b4) Outstanding fishery values. b5) Outstanding for its wild, scenic, or other natural characteristics b6) Outstanding scientific or ecological values b7) Outstanding recreational, historical, spiritual, or cultural values and; [c-f unchanged] Meeting one of the above criteria is sufficient to result in a water body being identified as outstanding under Policy 2.2.12 and therefore needing	Support	Policy needs to recognise part 9 of the RMA, and include all relevant criteria to identify outstanding water bodies.
55 Policy 2.2.13 - Managing outstanding water bodies and wetlands					
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 effects, including cumulative effects, on the water body or wetland's values; and ... e) EncouragingEnsuring enhancement of outstanding water bodies and wetlands."	Support	Consideration of cumulative effects is an important consideration in the management and protection of wetlands and outstanding water bodies.
Environmental Defence Society Incorporated	127	Amend	Amend the RPS to: • Include specific freshwater objectives, including objectives relating to freshwater bodies and wetlands. • Require avoidance of permanent loss of significant values of wetlands and outstanding fresh water bodies. • Require the avoidance of all adverse effects on these areas. • Identify what activities the effects of which need to be avoided. • Require enhancement of freshwater bodies and wetlands.	Support	• Managing outstanding water bodies and wetlands is critical to ensuring they are protected and preserved. This requires avoidance of adverse effects.
58 Objective 2.3 - Natural resource systems and their interdependencies are recognised					
Director-General of Conservation	117	Amend	Amend as follows: " Natural resource systems and their interdependencies are recognised and managed in an integrated manner"	Support	Natural resources should also be managed in an integrated manner that recognises the interdependencies.
271 Introduction to Objective 2.3					
Wise Response Society Inc.	114	Position	Amend Introduction to Objective 2.3 (p.39) as follows: "Our resources are interconnected, and [...]. These diverse	Support	Integrated management requires consistent management across connecting, land water and marine environments.

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 <u>while the use of these resources provide for the well-being of the Otago region</u> , the use of one can affect the values of another. Those interconnections are complex, and they are not always reflected in the functions of local authorities, or in the regional, district or city boundaries. An example of this issue is Otago's coastal environment, a highly valued resource at the nexus between land and marine environments that may additionally include freshwater systems. These diverse resources contribute to distinct land- and seascapes and support a corresponding range of ecosystems. For management purposes, the coastal environment is often partitioned into separate management units. Moreover, administration of this complex resource is guided by several statutes that are implemented by multiple authorities. This example illustrates why <u>as a result</u> , the management of natural resources needs to be integrated to ensure that resource management decisions are consistent and take a <u>appropriate</u> account of the linkages between every part of the environment, where necessary."	Oppose	The examples helps explain the intent of this objective and adds to the plain reading of the RPS.
Straterra	151		Support [explanation to Objective 2.3 - page 39] subject to the following amendment [to the end of the last paragraph]: " <u>As a further example of the need for integrated management, mining is a high-value use of land, and is a temporary land use, entailing the disturbance, and the subsequent rehabilitation or restoration of land when mining is completed, into a former use, an enhanced use or a new use. Once again, several</u> different pieces of legislation	Oppose	The proposed example is a justification for mining not an example of integrated management.
60 Policy 2.3.1 - Applying an integrated management approach among resources					
Director-General of Conservation	117	Support	Retain as proposed.	Support	Sustainable management requires consideration of the impacts of management of one resource on another and recognising that the form and function of resources may extend beyond the immediate site.
61 Policy 2.3.2 - Applying an integrated management approach among resources					
Federated Farmers of New Zealand	115	Support	Policy 2.3.2 a) is deleted.	Oppose	Natural resources don't recognise administrative boundaries and consistent objectives across boundaries facilitates integrated and sustainable management.
62 Policy 2.3.3 - Applying an integrated management approach for freshwater catchments					
Otago and Central South Island Fish and Game Councils	118	Amend	Ensure freshwater objectives, if assigned, are catchment- based to reflect existing practice, as follows: "Policy 2.3.3 Applying an integrated management approach for freshwater catchments Apply an integrated management approach to activities in freshwater catchments, by: a) Using consistent <u>catchment-based</u> freshwater objectives for interconnected water bodies; and..."	Support	As well as interconnected water bodies freshwater objectives should be consistent at the whole of Catchment level.
Environmental Defence Society Incorporated	127	Amend	Amend Policy 2.3.3 as follows: • 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.	Support	Policy needs to be clearer in providing a process to achieve integrated management for interconnected water bodies and within catchments. Recognition with out a direction as to how is unlikely to lead to integrated management.
65 Chapter B3 - general requests					
		Position			

Port Otago Limited	58	Support	<ul style="list-style-type: none"> • Have an objective that makes it clear that it is fundamental to the Otago Region's economy that the Dunedin and Port Chalmers ports are able to properly service the needs of the Otago regional economy. • Have policies that: • Make clear the fundamental importance to the Otago Region of the Dunedin and Port Chalmers ports; • Identify the need for the efficient and safe operation of the ports at Dunedin and Port Chalmers, the development of their capacity for shipping and their connection with other transport modes • Require any changes to ports' operations to, where possible, avoid remedy or mitigate adverse effects on the identified environmental values of the coastal environment. • Recognise: • The operations of the Dunedin and Port Chalmers ports have the potential to adversely affect the coastal environment; • In appropriate cases, the ports' operator may be authorised to carry out activities that have adverse effects that are otherwise required to be avoided by the plan and, in such cases, approval of the ports' operations requires it to be established that the benefits of the ports operations are greater than the adverse effects caused by them. 	Oppose	Port developments can have significant adverse effects on significant and or outstanding natural resources and environmental constraints need to be recognised. The NZCPS needs to be given effect to.
Fonterra Co-operative Group	99		Amend the PRPS to include the following objectives and policies	Oppose	The proposed objectives and policies give preference to undefined regionally significant industries. Regionally significant industries may result in local or regional adverse environmental impacts which need managing to give effect to the requirements of the RMA.
63 Policy 2.3.4 - Applying an integrated management approach for the coastal environment					
Environmental Defence Society Incorporated	127	Amend	Amend to include a suit of policies to achieve integrated management in the coastal environment and give effect to the NZCPS.	Support	Policy provides for integrated management approach in the coastal environment. This is needed to maintain coastal ecosystems and biodiversity. Adverse health and nuisance effects should be avoided not just reduced, in order to safeguard life supporting capacity of coastal ecosystems.
272 Outcome 3 and introduction		Position			
Fonterra Co-operative Group Limited	99	Amend	<p>Explain the necessity for regionally significant industries to have continued access to natural and physical resources, in terms of enabling people to continue to provide for their economic and social wellbeing in the explanatory text of Chapter 3 Outcome Statement (p.43) :</p> <p>"Otago is at risk of [...] economic, social, cultural and environmental wellbeing. Ensuring Otago's communities need to be maintained and developed in a resilient way having regard to:</p> <p>a) the need to have ongoing access to natural and physical resources (including ensuring communities and regionally significant industries are able to grow and develop);</p> <p>b) environmental constraints and the effects of activities on the environment,; and</p> <p>c) the need for communities to be are designed in way which helps us to prep are for, respond, recover and adapt to such disruptions, will help make Otago's communities resilient."</p>	Object	The proposed amendments are contrary to the purpose and principles of the RMA Act.
68 Issue 3.3 - Effects of climate change		Position			
Wise Response Society Inc.	114	Amend	Amend as follows: "Climate change will is expected to bring higher sea levels and an increased frequency of climate-related natural hazard events, which will in creasing the risk that Otago's communities face."	Support	Climate change is underway and this needs to be recognised and provided for now. Actions will be needed during the life of the RPS
278 Need 3.6		Position			
Queenstown Lakes District Council	95	Amend	Introduction to Chapter 3 (p.43) - Objective 3.6: consider greater emphasis on the importance of local energy production.	Oppose	Local energy production does not necessarily have fewer adverse environmental effects.

Federated Farmers of New Zealand	115	Amend	• Amend "Need" for Objective 3.6 as follows (or words to similar effect): "We need to reduce our dependency on fossil fuels, encourage sustainable energy use and improve our energy resilience. "	Oppose	Reducing our dependency on fossil fuels will improve the security and resilience of Otago's communities.
Otago and Central South Island Fish and Game Councils	118		Amend "Need" statement under Objective 3.6 (p. 45) as follows: "We need to recognise the finite nature of fossil fuels, and reduce our dependency on fossil fuels, and improve our energy resilience."	Support	Recognising the finite nature of fossil fuels and the contribution usage of fossil fuels has to climate change will assist in a transition away from fossil fuels.
72 Issue 3.7 - Urban design and development			Position		
Wise Response Society Inc.	114	Position	Amend as follows: "In the past, urban development has not always had regard to the local environment, or considered the	Support	Otago's communities will be more resilient and have improved quality of life with more energy efficient buildings and infrastructure.
76 Objective 3.1 - Protection, use and development of natural and physical resources			Position		
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. "	Support	Specific direction to consider the precautionary approach will provide for better recognition of natural and physical environmental constraints.
Otago and Central South Island Fish and Game Councils	118	Amend	Supports.	support	All activities need to recognise natural and physical environmental constraints.
282 Introduction to Objective 3.1					
Otago and Central South Island Fish and Game Councils	118	Position	Amend introduction to Objective 3.1 (p. 47) as follows: "As a community, we are highly dependent on the resources available to us. When undertaking activities it is therefore	Support	Need to consider the underlying environmental reality when undertaking protection, use or development of natural and physical resources.
78 Policy 3.1.1 - Recognising natural and physical environmental constraints			Position		
Wise Response Society Inc.	114	Amend	Amend as follows: "Policy 3.1.1 Recognising natural and physical environmental constraints and limits and acts accordingly Identify Recognise the natural and physical environmental constraints and limits likely to have an effect on an area, the likely effects of those constraints on activities, and the likely effects of those activities on those constraints, including: ... d) Exposure of the activity to natural and technological hazards or risks; and..."	Support	Consideration of likely effects will enable better recognition and provision for natural and physical environmental constraints.
91 Policy 3.2.11 - Locating hard mitigation measures			Position		
Wise Response Society Inc.	114	Support	Amend as follows: "Objective 3.3 Otago's communities are prepared for and able to adapt to the effect of <u>physical limits</u> that can not be avoided or mitigated of climate change."	support	Otago's communities will need to be able to adapt to the physical limits that can not be avoided or mitigated, rather than the effects of climate change.
Otago and Central South Island Fish and Game Councils	118	Amend	No amendments required.	Support	It is imperative that the effects of climate limits be considered and planned for now.
Dunedin City Council	156		Amend objective to add reference to the fact that Otago's contribution to reducing global greenhouse gas emissions will help mitigate the effects of climate change, thus making it easier for Otago to be prepared for and able to adapt.	support	Otago's communities will be better able to adapt to the effects of climate change if Otago contributes to the reduction in greenhouse gas emissions.
284 Introduction to Objective 3.3			Position		
Wise Response Society Inc.	114	Amend	• Amend the Need associated to Objective 3.3 as follows: "We need to have consistent guidance on sea level rise and, extreme weather events and management for adverse effects that will extend beyond the life of this RPS. "	support	Current wording suggests need is restricted to sea level rise, which is clearly not the intent, as it needs to include extreme weather events.
93 Policy suite 3.3 - Otago's commitment to climate change			Position		
Wise Response Society Inc.	114	Support	Address mitigation, through two additional policies with the following headers: "Identify physical limits that pose risks" and "Actively mitigate those risks that are serious".	Support	Support the policy but it could be improved as greater emphasis is needed on mitigating and avoiding the effects of climate change.
Otago and Central South Island Fish and Game Councils	118	Position	No amendments required.	support	Support the policy but it could be improved as greater emphasis is needed on mitigating and avoiding the effects of climate change.
Dunedin City Council	156		[Add to both policies] a new provision as follows: Promoting a reduction in Otago's greenhouse gas emissions to help reduce climate change.	Support	Reducing Otago's greenhouse gas emissions will help reduce the impacts of climate change.
99 Policy 3.4.2 - Managing infrastructure activities					

Otago and Central South Island Fish and Game Councils	118	Support	Amend b) as follows: "b) Reduce Avoid, remedy or mitigate adverse effects of those activities, including cumulative adverse effects on natural and physical resources and the environment; and"	Support	Infrastructure activities can have environmental impacts which need to be managed.
102 Objective 3.5 - Infrastructure of		Position			
Trustpower Limited	85	Support	Amend the objective as follows: "Infrastructure of national and regional significance is managed in a sustainable way. The development, use, operation and maintenance of infrastructure of national and regional significance is recognised and provided for. "	Oppose	Nationally and regionally significant infrastructure should be managed in a sustainable way, and adverse effects need to be managed. Objective as worded meets requirements of Part II RM Act.
Director-General of Conservation	117	Amend	Retain as notified	Support	The adverse environmental effects of all infrastructure need to be managed to achieve Part 11 RMA matters.
286 Introduction to Objective 3.5		Position			
Fonterra Co-operative Group Limited	99	Amend	Amend the introduction to Objective 3.5 (p. 59) as follows: "Infrastructure of national and regional significance, including roads, rail, electricity generation and transmission, and telecommunications, and regionally significant industries associated with primary production (such as dairy processing) are part of a national network, and contribute to the economic and social wellbeing of the nation."	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
103 Policy suite 3.5 - Infrastructure		Position			
Waitaki Irrigators Collective Limited	113	Amend	Recognise the national and regional importance of irrigation infrastructure within this suite of policies.	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
104 Policy 3.5.1 - Recognising national and regional significance of infrastructure		Position			
Transpower New Zealand Limited	97	Amend	Amend as follows: "Recognise the national and regional significance of the following infrastructure: by facilitating the operation, maintenance and upgrade of existing facilities and the establishment of new resources to meet the needs of present and future generations; ... b) The National Grid Electricity transmission infrastructure; and ..."	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Fonterra Co-operative Group Limited	99	Support	Retain Policy 3.5.1 as notified subject to the following amendments: "Recognise the national and regional significance of and provide for the continued operation of the following regionally and nationally significant infrastructure:..."	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Waitaki Irrigators Collective Limited	113	Amend	Addition of the following words: "Recognising national and regional significance of infrastructure... f) structures for transport by rail; and g) irrigation water infrastructure."	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Otago Water Resource Users Group	121	Support	• Amend as follows: "Recognise the national and regional significance of the following infrastructure:..." • Include "Central Otago irrigation schemes" in the list of infrastructure having national or regional significance.	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Horticulture New Zealand	124	Amend	• Amend b) as follows: "b) The National Grid Electricity transmission infrastructure; and" • Add an additional point: "g) irrigation infrastructure where it is regionally significant."	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Treble Cone Investment Limited	135	Amend	Amend as follows: "Policy 3.5.1 Recognising and providing for national and regional significance of infrastructure. Recognise and provide for the national and regional significance of the following infrastructure: a) Renewable electricity generation facilities, where they supply the national electricity grid and local distribution network; and ... f) Structures for transportation by rail and tourism activities."	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Dunedin City Council	156		Amend 3.5.1(f) to identify which structures for transport by rail are included as national or regional importance.	Support	There have been proposals for monorails which are not nationally or regionally significant infrastructure.

105 Policy 3.5.2 - Managing adverse		Position			
Port Otago Limited	58	Amend	Amend as follows: " Minimise adverse effects from infrastructure that has national or regional significance, by: a) (...); and b) Recognising that the management and/or development of infrastructure of national and regional significance may have adverse effects that would otherwise be required to be avoided under policies in Chapter 2 of this statement; and b - c.) Where it is not possible to avoid locating in the areas listed in (a) above, where possible, avoiding significant adverse effects on those values that are protected under policies 2.2.4, 2.2.6, 2.2.9 and 2.2.11 and on those values that contribute to the significant or outstanding nature of those areas; and	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
PowerNet Limited	60	Position	Amend the policy as follows: "Minimise Manage adverse effects from infrastructure that has national or regional significance that is located in by: a) Giving preference to avoiding their location in: i. Areas of significant indigenous vegetation and significant habitats of indigenous fauna; and ii. Outstanding natural features, landscapes and seascapes; and iii. Areas of outstanding natural character; and iv. Outstanding water bodies or wetlands; and By b) Where it is not possible to avoid locating in the areas listed	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Meridian Energy Limited	82	Position	Amend as follows: "Minimise adverse effects from	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Trustpower Limited	85	Amend	Amend the policy as follows: "Minimise Manage adverse effects from infrastructure that has national or regional significance that is located in by: a) Giving preference to avoiding their location in: i. Areas of significant indigenous vegetation and significant habitats of indigenous fauna; and ii. Outstanding natural features, landscapes and seascapes; and iii. Areas of outstanding natural character; and iv. Outstanding water bodies or wetlands; and By b) Where it is not possible to avoid locating in the areas listed in a) above, avoiding significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and c) Avoiding, remedying or mitigating other adverse effects on values; and d) b). Assessing the significance of adverse effects on those values, as detailed in Schedule 3 taking into account the measures to avoid, remedy or mitigate adverse effects ; and e) c). Considering where appropriate the use of offsetting, or other compensatory measures, for residual adverse effects on indigenous biodiversity that are significant and cannot be otherwise avoided, remedied	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.

Transpower New Zealand Limited	97	Position	Amend as follows: "In managing the effects Minimise adverse effects from infrastructure that has national or regional significance, territorial authorities shall take into account the following by: a) The constraints imposed by the technical, operational and locational requirements of the infrastructure when considering Giving preference to avoiding their location in: ... b) Where it is not possible to avoid locating in the areas listed in a) above, having regard to the extent to which avoiding	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Fonterra Co-operative Group Limited	99	Amend	Amend Policy 3.5.2 to read: "Minimise Manage significant adverse effects from infrastructure that has national or regional significance, by:"	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Royalburn Farming Company Ltd	102	Amend	Amend as follows: "Policy 3.5.2 Managing adverse effects of significant infrastructure that has national or regional significance Minimise Avoid, remedy or mitigate adverse effects from significant infrastructure that has national or regional significance, by: a) Requiring comprehensive alternative site assessments to be provided if a new development is proposed that will result in significant adverse effect on Giving preference to avoiding their location in: ... b) Where it is not possible to avoid locating in the areas listed in a) above, avoiding minimising significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and ... d) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and e) Considering Enabling infrastructure providers to employ the use of offsetting, or other compensatory measures to address, for residual adverse effects on the environment indigenous biodiversity."	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Director-General of Conservation	117	Amend	Amend as follows: "Minimise adverse effects from infrastructure that has national or regional significance, by: ... e) Considering Requiring the use of offsetting, or other compensatory measures, for to manage significant residual adverse effects on	Support	Better guidance is needed on use of Off Sets.
Pioneer Generation Limited	142	Amend	That Policy 3.5.2 be adopted with the following amendments: "Minimise Manage the adverse effects from infrastructure that has national or regional significance, by that is to be located within : a) Giving preference to avoiding their location in: i-iv. (retain) b) Where it is not possible to avoid locating in the areas listed in a) above, avoiding significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and c) Avoiding, remedying or mitigating other adverse effects on values; and d) a) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and taking into account the measures to be implemented to avoid, remedy or mitigate the adverse effects of the proposed infrastructure and also the positive effects associated with the implementation of the same. e) b) Considering the use of offsetting, or other compensatory measures, for residual adverse effects on indigenous biodiversity, that cannot otherwise be appropriately avoided, remedied or mitigated."	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.

Straterra	151	Position	Support subject to the following amendments: "Minimise Manage adverse effects from infrastructure that has national or regional significance, by: a) Giving preference to avoiding their location in: ... b) Where it is not possible to avoid locating in the areas listed in a) above, avoiding, remedying or mitigating significant adverse effects on those values that contribute to the significant or outstanding nature of those areas; and c) Avoiding, remedying or mitigating other adverse effects on values; and d) Assessing the significance of adverse effects on those values, as detailed in Schedule 3; and e) Considering the use of offsetting, or other compensatory measures, for residual adverse effects on indigenous	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
106 Policy 3.5.3 - Protecting infrastructure		Position			
Name	Number	Amend	Decision Requested		
Port Otago Limited	58	Support	<ul style="list-style-type: none"> • Include specific reference to the role of the port within the coastal environment. • Include specific reference to the need to protect the port from reverse sensitivity effects. • Add a new g): "<u>Ensuring that the ports at Port Chalmers and Dunedin are able to operate and develop as necessary to meet the present and future needs of the community.</u>" 	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Contact Energy Limited	74	Position	<ul style="list-style-type: none"> • Amend 3.5.3 a) to read as follows: "a) Restricting Preventing the establishment of activities that may result in reverse sensitivity effects" • Amend Policy 3.5.3 b) and c) to read as follows: "b) Avoiding significant adverse effects, <u>including effects which are cumulatively significant</u>, on the functional needs of such infrastructure." "c) Avoiding, remedying or mitigating other adverse effects, including cumulative effects, on the functional needs of such 	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Meridian Energy Limited	82	Support	<ul style="list-style-type: none"> • Amend as follows: "Protect infrastructure of national or regional significance, by: a) [unchanged] b) <u>Assessing the significance of adverse effects on those needs in accordance with the criteria in Schedule 3; and</u> b) c) Avoiding significant adverse effects on the functional needs operation of such infrastructure; and c) d) Avoiding, remedying or mitigating other adverse effects on the functional needs s operation of such infrastructure <u>in a way that does not foreclose the ability of such infrastructure to continue functioning</u>; and d) Assessing the significance of adverse effects on those needs, as detailed in Schedule 3; and e) [unchanged] g) <u>Maintaining access to such infrastructure for maintenance</u> and operational purposes. 	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Federated Farmers of New Zealand	115	Support	<ul style="list-style-type: none"> • Replace clause a) with clause d) • Amend as follows (or words to similar effect): "Protect infrastructure of national or regional significance, by: a) Restricting the establishment of incompatible activities that may result in significant reverse sensitivity effects; and b) Avoiding <u>or managing</u> significant adverse effects on the functional needs of such infrastructure; and ..." 	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
287 Introduction to Objective 3.6		Position			
Wise Response Society Inc.	114	Amend	<ul style="list-style-type: none"> • Amend the Need associated to Objective 3.6 as follows: "<u>To reduce exposure to this issue w</u>We need to minimise<u>reduce our dependency on fossil fuels and improve our energy resilience and efficiency of use.</u>" 	Support	To improve community resilience we need to plan and work to minimise our reliance on fossil fuels.

Otago and Central South Island Fish and Game Councils	118	Amend	Amend the last paragraph of the narrative under Objective 3.6 (p. 61) as follows: "In particular, Otago's reliance on fossil-based transport fuels could be reduced in the medium to long term through more efficient or alternative transport fuels	Support	To improve community resilience we need to plan and work to minimise our reliance on fossil fuels.
Straterra	151	Amend	Support [explanation to Objective 3.6 - page 61] subject to the following amendments: "The social and economic well-being of Otago's people, and their health and safety, is dependent on their energy needs being met by a reliable, affordable, environmentally sustainable and secure supply of energy. More efficient energy uses, and a greater diversity of energy sources, including local discovery and development of energy resources, have the potential to increase community resilience, while increasing our ability to sustain economic growth. In particular, Otago's reliance on fossil-based transport fuels could be reduced in the medium to long term through more efficient or alternative transport fuels, and the supply thereof could be safeguarded by encouraging local	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
108 Policy suite 3.6 - Energy supply					
Transpower New Zealand Limited	97	Amend	Insert a new policy as follows: "Protect the National Grid by: a) Avoiding significant adverse effects, including reverse sensitivity effects, on the National Grid; and b) Avoiding any other adverse effects on the National Grid, or remedying or mitigating them appropriately where avoidance is not possible; and c) Ensuring that existing National Grid corridors are identified [and] protected in all resource management decision making; and d) Ensuring that any new activities that would adversely affect the operation, maintenance or upgrading of the National Grid are not located near existing infrastructure associated with the National Grid; and e) Ensuring that there is no change to existing activities that increases their incompatibility with existing National Grid infrastructure; and f) Notifying the owners and operators of infrastructure of consent applications that may adversely affect National Grid infrastructure."	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
109 Policy 3.6.1 - Using existing renewable electricity generation structures and facilities					
Contact Energy Limited	74	Amend	Expand Policy 3.6.1 by adding a) to read as follows (using the language of the NPS REG): " a) enabling the maintenance, operation, upgrading and development of existing renewable electricity generation activities. "	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Meridian Energy Limited	82	Amend	Amend as follows: " Give preference to <u>Enable</u> the use of existing structures or facilities to increase the region's renewable electricity generation capacity over developing new structures in new locations. "	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
110 Policy 3.6.2 - Promoting small scale generation					
Name	Number	Support	Decision Requested		
Clutha District Council	28	Amend	No change.	Support	This policy contributes to achieving other policies around resilience and reducing demand for fossil fuels.
Queenstown Lakes District Council	95	Support	Support	Support	This policy contributes to achieving other policies around resilience and reducing demand for fossil fuels. However even small scale renewable generation can have adverse effects, depending upon location.
111 Policy 3.6.3 - Protecting the generation environment					

PowerNet Limited	60	Amend	Amend the policy as follows: "Enable the development of new and protect the generation capacity of <u>existing</u> nationally or regionally significant renewable electricity generation activities, by: ... b) Restricting <u>Avoiding</u> the establishment of those activities that may result in reverse-sensitivity effects;"	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Contact Energy Limited	74	Support	• 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;"	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Sir Alan Mark	77	Amend	Supported.	Support	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Waitaki Irrigators Collective Limited	113	Amend	Insert the following: "d) ... Schedule 3; <u>provided that</u> e) any adverse effects on other industries <u>are avoided, or where this is not practicable, remedied or mitigated.</u> "	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
Otago Water Resource Users Group	121	Amend	Delete Policy 3.6.3 c).	Oppose	The notified version should be retained as there is no justification for the change and the notified version better serves the purpose of the Act.
114 Policy 3.6.6 - Reducing long term		Position			
Bus Users Support Group Otepoti-Dunedin (Bus Go Dunedin)	44	Position	• Support the inclusion of public transport as a means to help achieve this policy. • Amend b)iii. to "Having high design standards for pedestrian and cyclist and public transport users safety and amenity;"	Support	<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 electric vehicles, is likely to lessen the reliance on fossil fuels and reduce the incidence of road injuries/fatalities. • Lower emission transport fuels and home heating will also have positive effect on health of communities through improved air quality. • When embracing new technologies it is important to consider their sustainability, for example some biofuels are not low emission when land conversion is included in the analysis.
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 efficient energy uses, or renewable or lower emission transport fuels such as electric rail;</u> <u>ii) develop a carefully planned and equitable strategy to phase out the use of fossil fuels for home heating. This will included transitioning the housing stock to improved housing efficiency and increasing the use of renewable energy for heating.</u>	Support	The suggested amendments will help build community and environmental resilience.
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: a) Promoting Encouraging the development of compact and well-integrated urban areas, to reduce travel needs within those areas; and ... c) Promoting Enabling the development or upgrade of transport infrastructure and associated facilities that:	Support	The resilience of Otago's communities will be dependent upon rapidly minimising demand for fossil fuels.

Otago and Central South Island Fish and Game Councils	118	Amend	Amend as follows: "Policy 3.6.6 Recognise the finite nature of fossil fuels and reduce Reducing long-term demand for fossil fuels Reduce the long-term demand for fossil fuels from Otago's communities, by:... "	Support	The resilience of Otago's communities will be dependent upon rapidly minimising demand for fossil fuels.
Z Energy Limited, BP Oil NZ Limited and Mobil Oil NZ Limited	128	Position	Amend Policy 3.6.6 as follows: "Reduce the long term demand for fossil fuels from Otago's	Oppose	The resilience of Otago's communities will be dependent upon rapidly minimising demand for fossil fuels.
137 Chapter B4 - general requests		Position			
Royalburn Farming Company Ltd	102	Amend	<ul style="list-style-type: none"> • Add the following objective: "Significant industry activities and physical resources are provided for". • Add the following policy: "Recognising and providing for significant industry activities and physical resources Recognising and providing for significant industry activities and physical resources, by: a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety; b) Protecting significant industry activities from inappropriate subdivision, use, and development; c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated." • Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to: a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and cultural well-being; b) Protect significant industry activities from inappropriate subdivision, use, and development; c) Enable significant industry activities and development that does not have a significant adverse effect on the environment; d) Provide for urban development and all other significant industry activities and 	Oppose	The notified version should be retained as there is no justification for the additions and the notified version better serves the purpose of the Act.

Real Journeys	138	Amend	<ul style="list-style-type: none"> • Add the following objective: "Significant industry activities and physical resources are provided for". • Add the following policy: "Recognising and providing for significant industry activities and physical resources Recognising and providing for significant industry activities and physical resources, by: <ul style="list-style-type: none"> a) Recognising that the use, development and protection of physical resources enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety; b) Protecting significant industry activities from inappropriate subdivision, use, and development; c) Enabling significant industry activities and development that does not have a significant adverse effect on the environment; and providing for all other significant industry activities and development if adverse effects on the environment are avoided, remedied, or mitigated." • Add the following Method: "Regional, city and district councils will ensure Regional and District Plans set objectives, policies and methods to: <ul style="list-style-type: none"> a) Recognise that development, use, and protection of physical resources and the urban environment enables people and communities to provide for their social, economic, and cultural well-being; b) Protect significant industry activities from inappropriate subdivision, use, and development; c) Enable significant industry activities and development that does not have a significant adverse effect on the environment; d) Provide for urban development and all other significant industry activities and 	Oppose	The notified version should be retained as there is no justification for the additions and the notified version better serves the purpose of the Act.
291 Outcome 4 and introduction		Position			
Federated Farmers of New Zealand	115	Amend	<ul style="list-style-type: none"> • Amend the introduction to Chapter 4 as follows (or words to similar effect): "The use of natural and physical resources underpins economic and community activity wellbeing in Otago. However, due to the importance of these resources to Otago's wellbeing, and the dynamic and highly interconnected nature of the environment the sustainable management of our resources requires consideration of the adverse effects of resource use on the environment and on other resource users." 	Oppose	The notified version should be retained as there is no justification for the changes and the notified version better serves the purpose of the Act.
292 Need 4.1		Position			
Otago and Central South Island Fish and Game Councils	118	Amend	Amend "Need" statement under Objective 4.1 (p. 76) as follows: "... We need to use the opportunities subdivision and development create, to improve access to Otago's natural environment, or, in rare circumstances, such as around ports, to limit access to more sensitive places."	Support	Public access should rarely be restricted.
295 Need 4.4		Position			
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 maximise enable socio-economic and cultural benefits, as well as sustain environmental wellbeing." 	Oppose	The notified version should be retained as there is no justification for the changes and the notified version better serves the purpose of the Act.
144 Objective 4.1 - Public access to		Position			
Otago and Central South Island Fish and Game Councils	118	Support	No changes required.	Support	Objective is consistent with Part II RMA.
145 Policy suite 4.1 - Public access		Position			
Otago and Central South Island Fish and Game Councils	118	Amend	No changes required.	Support	Policies are consistent with Part II RMA.
146 Policy 4.1.1 - Maintaining and e		Position			
Fonterra Co-operative Group Limited	99	Amend	Include an additional clause to read: "Ensure a level of security consistent with the operational requirements of a lawfully established activity or resource consent."	Oppose	The notified version should be retained as there is no justification for the changes and the notified version better serves the purpose of the Act.
Director-General of Conservation	117	Position	Retain as notified	Support	Policies are consistent with Part II RMA.
154 Policy suite 4.3 - Sufficient land		Position			

Holcim (New Zealand) Limited	92	Oppose	Insert a new Policy as follows: "Recognise the benefits derived from mineral prospecting, exploration, extraction and processing, particularly their contribution to wards social, cultural and economic wellbeing."	Oppose	The notified version should be retained as there is no justification for the changes and the notified version better serves the purpose of the Act.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Amend	• Add additional policies to: "Minimise the effects of existing pests and avoid the establishment of new pest species."	Support	The spread of existing or new pest species is a threat to productive land, the economy and indigenous species.
155 Policy 4.3.1 - Managing for rural activities					
Aurora Energy Limited	76	Support	Amend e) as follows: "e. Providing for other activities that have a functional need to locate in rural areas, including <u>regionally significant infrastructure</u> , tourism and recreational activities that are of a nature and scale compatible with rural activities."	Oppose	The notified version should be retained as there is no justification for the changes and the notified version better serves the purpose of the Act.
PauaMAC 5 Incorporated and The Otago Rock Lobster Industry Association Incorporated	80	Amend	Amend (a) to read: "Enabling farming, <u>fishing</u> , and other rural activities that support the rural economy;"	Oppose	The notified version should be retained as there is no justification for the changes and the notified version better serves the purpose of the Act.
Fonterra Co-operative Group Limited	99	Amend	Amend Policy 4.3.1 clause a) to read: "a) Enabling <u>primary production</u> , farming activities and other rural activities that support the rural economy; and";	Oppose	The notified version should be retained as there is no justification for the changes and the notified version better serves the purpose of the Act.
Royalburn Farming Company Ltd	102	Amend	Amend as follows: "Managing for rural Protecting regionally significant industry activities from inappropriate subdivision, use and development Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling <u>regionally significant industry activities</u> , farming and other rural activities that support the rural economy; and b) Minimising the loss of <u>regionally significant soils</u> highly valued for their versatility for primary production; and c) Restricting the establishment of activities in rural areas that may lead to reverse sensitivity effects on regionally significant industry activities; and d) Minimising Restricting the subdivision of productive rural land into smaller lots that may result in inappropriate rural residential activities; and e) Providing for other activities that have a functional need to locate in rural areas, including tourism and recreational activities that are of a nature and scale compatible with rural activities."	Oppose	The notified version should be retained as there is no justification for the changes and the notified version better serves the purpose of the Act.
Otago and Central South Island Fish and Game Councils	118	Amend	Amend as follows: "Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling <u>sustainable</u> farming and other rural activities that support the rural economy; and b) Minimising Avoid, remedy or mitigate the loss of soils highly valued for their versatility for primary production; and ..."	Support	Policy is not consistent with Part II RMA>
Straterra	151	Position	Support subject to the following amendments: "Manage activities in rural areas, to support the region's economy and communities, by: a) Enabling farming and other rural activities, <u>including minerals and petroleum activities</u> , that support the rural economy; and b) Avoiding, remedying or mitigating Minimising the loss of	Oppose	The proposed changes are inconsistent with Part II RMA, and focuses on activities not the effects of activities.
156 Policy 4.3.2 - Managing land use					
Central Otago District Council	37	Did not specify	Delete Policy 4.3.2.	Oppose	Landuses in dry catchments need to be managed to avoid reduction in water yield and ensure Otago's communities are resilient.

J.C.F. Rowley	48
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The solution is water harvesting - build dams.	Oppose	Landuses can have significant impact on water yields.
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SUBMISSION

FURTHER SUBMISSION FORM (Print clearly on both sides) Proposed Regional Policy Statement for Otago (Form 6, Clause 8 of the First Schedule, Resource Management Act 1991)

Name of further submitter: **JOHN BERNARD NAPP**

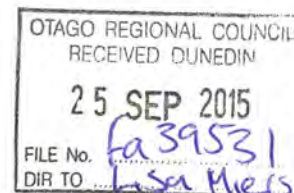
Organisation (if applicable): **STRATERRA**

Postal address: **93 THE TERRACE, WELLINGTON**

Postcode: **PO BOX 10688 WELLINGTON 6143**

Telephone: **04 974 8671, 027 646 1000**

Email: bernie@straterra.co.nz



Important note to submitter: 1. A copy of your further submission must be served on the original submitter within five working days of making the further submission. 2. All further submissions are made available for public inspection.

I wish / do not wish (circle preference) to be heard in support of my further submission. If others make a similar submission, I will / will not consider presenting jointly with them at a hearing (circle preference).

Tick as appropriate:

☐ I represent a relevant aspect of the public interest.

☐ I have an interest in the proposal greater than the interest that the general public has.

Signature: **JB Napp**, Date: **24 September 2015**

SUBMISSIONS MUST BE RECEIVED BY 5.00 PM, FRIDAY 25 SEPTEMBER 2015

1. State which submitter your further submission relates to	2. State what part of the submission your further submission relates to and if you support or oppose it	3. Give reasons for your support / opposition
Fonterra Co-operative Group Limited	Policy 2.1.1 Support	The lack of mention in the pORPS of the National Policy Statement for Freshwater Management 2014 is problematic and is leading the council to develop its own policy. As currently worded, Policy 2.1.1 will likely stymie economic development and other human activities, in many cases, unnecessarily and with no means of assessing the trade-offs or the net benefit of a project.

Environmental Defence Society Incorporated	Policy 2.1.1 (k) Support	We agree that the spreading of freshwater pests cannot be completely avoided. As discussed in our primary submission, the widespread use of the term “avoid” in the pORPS takes no account of the implications of the <i>King Salmon</i> decision, and will lead to no development being possible in Otago where the word “avoid” is to apply.
Fonterra Co-operative Group Limited	Policy 2.1.2 Support the deletion, and merging with Policy 2.1.1	Policy 2.1.1 and 2.1.2 could be run together to provide a consistent approach.
Oceana Gold (New Zealand) Limited	Policy 2.1.2 Support	The pORPS is overly protectionist in its use of “avoid”, and could unnecessarily stymie development in areas where development is desirable, as discussed in Straterra’s primary submission.
Jasmine Hunter	Policy 2.1.4 Oppose	Coal is one-third the price of electricity as a source of heat; that is why the Cadbury chocolate factory, the University of Otago and numerous other business and commercial premises use coal. Such operations will need resource consents for any emissions.
Oceana Gold (New Zealand) Limited	Policy 2.1.5 Support	As elsewhere, great care with wording is needed (because of <i>King Salmon</i>) to provide for sustainable management, including the development of natural resources.
Darby Planning LP	Policy 2.1.6 Support	Because of <i>King Salmon</i> .
Darby Planning LP	Policy 2.2.2 Oppose	Minerals exploration and mining are examples of location-specific activities; you can only mine in the very few places where mineral resources occur in economic quantities. Therefore, in situations where matters of national importance apply, great care has to be taken to avoid preventing all development in such situations.
Meridian Energy Limited	Policy 2.2.2 Support	Meridian provides for compensation and offsets as options of equal standing. That is an important

		component to policy on offsets, and other forms of mitigation, for these tools to be workable.
Forest and Bird NZ	Policy 2.2.2 Oppose this and similar advocacy on other policies	The <i>King Salmon</i> decision has tilted the RMA playing field, requiring great care when writing provisions in policy statements and plans. This reflection applies to much of the wording of the pORPS.
Director-General of Conservation	Policy 2.2.2 Oppose	No account taken of the implications of the <i>King Salmon</i> decision. Compensation should also be provided for as an option when mitigating residual effects, on the same footing as offsets.
Oceana Gold (New Zealand) Limited	Policy 2.2.2 Support	The RMA provides for flexibility in avoiding, remedying and mitigating, and this should be maintained.
Director-General of Conservation	Policy 2.2.4 Oppose	The NZCPS does not apply to all landscapes or natural features. This submission point ignores the implications of the <i>King Salmon</i> decision, as discussed elsewhere.
Forest and Bird NZ	Policy 2.2.6 Oppose	For reasons expressed elsewhere, the submission point ignores the implications of the <i>King Salmon</i> decision.
Transpower New Zealand Limited	Policy 2.2.13 Support	Succinct and accurate wording in relation to the <i>King Salmon</i> decision, which ORC has ignored, and which has been ignored by a number of submitters.
Oceana Gold (New Zealand) Limited	Policy 2.2.13 Support	Succinct reasoning that it is not always possible to avoid all effects.
New Zealand Petroleum & Minerals	Policy 2.2.15 Support	A good point is made in relation to investment made by ORC and others in minerals exploration in Otago.
Oceana Gold (New Zealand) Limited	Policy 2.2.15 Support	It is not always possible to avoid effects, as discussed above.

Fonterra Co-operative Group Limited	Policy 2.3.3 Support	Appropriate reference is made to the NPS-FM 2014, which should be the basis of freshwater management in this RPS.
Port Otago Limited	Policy 3.5.2 Support	Another good explanation of the implications of the <i>King Salmon</i> decision.
Director-General of Conservation	Policy 3.5.2 Oppose	Compensation or compensatory measures need to be included as a mitigation option, on equal footing with biodiversity offsets. This is good policy practice in any event, and the government (Department of Conservation) guidance on biodiversity offset is unworkable for the end-users, as discussed in Straterra's primary submission.
Sir Alan Mark	Policy 3.6.6 Oppose	Greenhouse gas emissions are managed under the Climate Change Response Act 2002.
Blueskin Resilient Communities Trust	Policy 3.6.6 Oppose	Greenhouse gas emissions are managed under the Climate Change Response Act 2002.
Fonterra Co-operative Group Limited	Policy 3.6.6 Support	Important point made about the diverse uses in industry to which fossil fuels are put.
Wise Response Society Inc.	Policy 3.6.6 Oppose	Greenhouse gas emissions are managed under the Climate Change Response Act 2002.
Otago and Central South Island Fish and Game Councils	Policy 3.6.6 Oppose	Resources are not finite in practice. Resources can never run out because once their cost (because of increasing scarcity) exceeds that of the next best alternative, that alternative will be chosen, and that could also include a different type of fossil fuel (e.g., coal-seam gas, diesel produced with lignite). The market, with the wise intervention of appropriate legislation, will decide which energy resources are used in preference to others, coupled with government intervention under appropriate legislation, e.g., a carbon

		price under the Climate Change Response Act 2002 regime.
Darby Planning LP	Policy 3.8.3 Support	The point about unwarranted bias towards farming as a use of rural land is well made. Mining is an example of a very high-value use of land, typically much higher than farming. Note: a mine can be developed only with the consent of the land owner for access.
New Zealand Petroleum & Minerals	Policy 3.8.3 Support	An important point that investment has been made in minerals exploration in Otago.
Royalburn Farming Company Ltd	Policy 3.8.3 Support	This and like-minded submitters are farmers who recognise that there are higher-value uses for land, than farming.
Director-General of Conservation	Objective 4.2 Oppose	It is wrong to apply the NZCPS to areas beyond the jurisdiction of the NZCPS. The protectionist wording is at odds with the Heritage NZ Pouhere Taonga Act 2014, which provides for heritage to be modified or destroyed, subject to criteria. Most mining is done today where mining was done in the past. DOC's proposal risks having every pile of stones and depression in the ground left behind by the old timers having to be protected.
Heritage New Zealand Pouhere Taonga	Objective 4.2 Oppose	The protectionist wording is at odds with the Heritage NZ Pouhere Taonga Act 2014, which provides for heritage to be modified or destroyed, subject to criteria. Most mining is done today where mining was done in the past. HNZ's proposal risks having every pile of stones and depression in the ground left behind by the old timers having to be protected.
Heritage New Zealand Pouhere Taonga	Policy 4.2.3 Oppose	The Heritage NZ Pouhere Taonga Act 2014 applies. That Act is less protectionist than the points made in this submission, and provides for heritage to be modified or destroyed, if that is appropriate. Most mining is done today where mining was done in

		the past. HNZ's proposal risks having every pile of stones and depression in the ground left behind by the old timers having to be protected.
Oceana Gold (New Zealand) Limited	Policy 4.2.3 Support	Important points in relation to the interaction between proposed mining activities, and mining heritage.
Bruce Lambie	Policy 4.3.2 Oppose	Tussocklands could be a good area for mining, and when the mine site is rehabilitated, noting its relatively small footprint, it can be returned into tussocklands.
Forest and Bird NZ	Policy 4.3.2 Oppose	Tussocklands could be a good area for mining, and when the mine site is rehabilitated, noting its relatively small footprint, it can be returned into tussocklands.
Director-General of Conservation	Policy 4.3.2 Oppose	Tussocklands could be a good area for mining, and when the mine site is rehabilitated, noting its relatively small footprint, it can be returned into tussocklands.
NZ Pork Industry Board	Policy 4.3.6 Oppose	In mining, we borrow the land, mine it, and return it, including into farmland or for other rural activities. Mining is typically a much higher-value use of land than farming, and can occur only when it is a higher-value use, otherwise, land owner consent would not be granted.
Holcim (New Zealand) Limited	Policy 4.3.6 Support	Compelling discussion on location-specific resources and activities.
Forest and Bird NZ	Policy 4.3.6 Oppose	The call for blanket prohibition of minerals and petroleum activities in outstanding and significant areas ignores the implications of the <i>King Salmon</i> decision, and the reality that minerals are where they have been placed by Papatuanuku or Mother Nature. The RMA provides for appropriate consideration of projects, and in special areas, the bar to meet environmental standards would be higher, as reflecting the values in the

		land. As well, mining earns high wealth off a small footprint.
Oceana Gold (New Zealand) Limited	Policy 4.3.6 Support	Good discussion of the location-specific nature of minerals and mining.
Director-General of Conservation	Objective 4.5 Oppose	The point about minimising and avoiding is well intentioned; however, it reflects a conservation focus and mandate, rather than the reality of natural resource-based businesses, and the purpose of the RMA.
NZ Pork Industry Board	Policy 4.5.6 Oppose	Minerals and mining is a higher-value land-use than farming, in almost every case, and once mining is completed, the land is returned into a former use, a new use or an enhanced use, depending on resource consent conditions. It is usually the case that where farmland is used for mining, it is returned into farmland that is more productive. Mining can only occur when land owner consent is provided.
Director-General of Conservation	Policy 4.5.6 Oppose	It is wrong to require biodiversity offsets as the sole tool for managing the residual effects of development. That is inconsistent with the purpose and intent of the RMA. Compensation should be provided for on equal footing, as an approach to mitigation. The government (Department of Conservation) guidance on biodiversity offsets is unworkable, for the reasons stated in Straterra's primary submission.
Heritage New Zealand Pouhere Taonga	Policy 4.5.6 Oppose	While well intentioned, the protectionist policy intent is at odds with the Heritage NZ Pouhere Taonga Act 2014, which provides for the modification and destruction of heritage, subject to criteria. Mining today is often done where mining was done in the past by the old timers.
Oceana Gold (New Zealand) Limited	Policy 4.5.6 Support	A compelling discussion on the issues
Clutha District Council	Policy 4.5.7 Support	Offsetting is not always appropriate, because it is not always possible to

		<p>design an offset that will be cost-effective for the project proponent. Compensatory measures also need to be provided for as a mitigation tool. As well, the government (Department of Conservation) guidance on biodiversity offsets is unworkable for the reasons stated in Straterra's primary submission.</p>
Otago Peninsula Biodiversity Group	Policy 4.5.7 Oppose	<p>Biodiversity offsets is a complex topic requiring expertise in areas such as: ecology, legal, financial, operations, planning, business, policy. Straterra staff have been working on this topic since 2007.</p> <p>Offsetting is not always appropriate, because it is not always possible to design an offset that will be cost-effective for the project proponent. Compensatory measures also need to be provided for as a mitigation tool. As well, the government (Department of Conservation) guidance on biodiversity offsets is unworkable for the reasons stated in Straterra's primary submission.</p>
Forest and Bird NZ	Policy 4.5.7 and 4.5.8 Oppose	<p>Biodiversity offsets is a complex topic requiring expertise in areas such as: ecology, legal, financial, operations, planning, business, policy. Straterra staff have been working on this topic since 2007.</p> <p>Offsetting is not always appropriate, because it is not always possible to design an offset that will be cost-effective for the project proponent. Compensatory measures also need to be provided for as a mitigation tool. As well, the government (Department of Conservation) guidance on biodiversity offsets is unworkable for the reasons stated in Straterra's primary submission.</p>

Director-General of Conservation	Policy 4.5.7 and 4.5.8 Oppose	<p>Biodiversity offsets is a complex topic requiring expertise in areas such as: ecology, legal, financial, operations, planning, business, policy. Straterra staff have been working on this topic since 2007.</p> <p>Offsetting is not always appropriate, because it is not always possible to design an offset that will be cost-effective for the project proponent. Compensatory measures also need to be provided for as a mitigation tool. As well, the government (Department of Conservation) guidance on biodiversity offsets is unworkable for the reasons stated in Straterra's primary submission.</p>

