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**FURTHER SUBMISSION BY CONTACT ENERGY LIMITED
IN SUPPORT OR OPPOSITION TO SUBMISSIONS ON THE
PROPOSED REGIONAL POLICY STATEMENT FOR OTAGO**

To: Chief Executive
Otago Regional Council
Private Bag 1954
70 Stafford Street
DUNEDIN 9054

rps@orc.govt.nz

Name of Submitter: Contact Energy Limited

Contact Person: Rosemary Dixon

Address for Service: Contact Energy Limited
PO Box 10742
The Terrace
WELLINGTON 6143

Telephone: 0-4-462 1284
Cell: 021 222 1181
Email: rosemary.dixon@contactenergy.co.nz

Contact Energy Limited (Contact) submitted on the Proposed Regional Policy Statement for Otago (Proposed RPS).

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Contact wishes to make further submissions in support or opposition to submissions on the Proposed RPS.

Contact has an interest in the Proposed RPS greater than the interest that the general public has generally.

Contact's further submissions are as set out in the table attached.

Contact wishes to be heard in support of its submissions and further submissions.

Yours faithfully

CONTACT ENERGY LIMITED

A handwritten signature in black ink, appearing to read "Rosemary Dixon". The signature is written in a cursive style with a large initial "R" and "D".

Rosemary Dixon

Special Counsel - Environment

DDI: 04 462 1284

Fax: 04 463 9261

Email: rosemary.dixon@contactenergy.co.nz

**PROPOSED REGIONAL POLICY STATEMENT FOR OTAGO
FURTHER SUBMISSION BY CONTACT ENERGY LIMITED**

Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
Otago and Central South Island Fish and Game Councils	118/3	Whole Regional Policy Statement (overall approach)	Insert a list of regionally significant resource management issues in Part A, as follows: <u>"Regionally Significant Resource Management Issues</u> <u>Issue 1: Cumulative effects of human activities on natural resources, including the over allocation and degradation of freshwater resources.</u> <u>Issue 2: Managing complex interconnections between natural resources.</u> <u>Issue 3: Incorporating tangata whenua values in resource management decisions.</u> <u>Issue 4: Spreading of pest species.</u> <u>Issue 4A: The loss of biodiversity, including indigenous biodiversity.</u> <u>Issue 4B: The loss and degradation of wetlands.</u> <u>Issue 5: Vulnerability to natural hazards.</u> <u>Issue 6: Adapting to climate change.</u> <u>Issue 7: Responding to fuel and energy constraints."</u> [Page 749 of Summary]	Oppose	As acknowledged in the submission, the issues are stated in the relevant chapters. There is no need to repeat them.
Otago and Central South Island Fish and Game Councils	118/3	Whole Regional Policy Statement (overall approach)	Ensure RPS is consistent with the Otago Sports Fish and Gamebird Management Plan [Page 749 of Summary]	Oppose	The outcome, in terms of changes to the RPS, is not clear should the submission be accepted. Decision makers are only required to have 'regard to' the Management Plan.

Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
Forest and Bird NZ	98/259	Regionally Significant Issues	<ul style="list-style-type: none"> • Re write the issues for the region so that they are in accordance with Section 59 and 62 (RMA) to provide a more detailed overview of the significant issues including indigenous biodiversity, the regional matters of National Importance (S6 RMA). • Re write the objectives so that they deal with each of the regionally significant resource issues, rather than generalised outcomes, and provide clear reasons and explanations for Objectives and Policies. <p>[Page 751 of Summary]</p>	Oppose	The outcome, in terms of changes to the RPS, is not clear should the submission be accepted.
Matthew Sole	75/24	Chapter B2 – general requests	<ul style="list-style-type: none"> • Add objectives relating specifically to freshwater, beds of rivers lakes wetlands and their margins, coastal water, outstanding natural features and landscapes including seascapes, land and seascapes, natural character, including: <ul style="list-style-type: none"> • The following biodiversity objective: <p><u>"Indigenous biodiversity in terrestrial, freshwater and coastal environments is maintained through protection and is restored and/or enhanced where it has been lost or degraded so that the full range of naturally occurring ecosystems and habitats and their complement of flora and fauna is present across / characterises the region, and enhancement, and restoration particularly in places where biodiversity has been lost, or degraded."</u></p> • The following objective: <p><u>"Human activity supports the healthy functioning and resilience of naturally occurring ecosystems including where integrated with production systems."</u></p> • Add an explanation that this objective seeks to halt 	Oppose	<p>The outcome, in terms of changes to the RPS, is not clear should the submission be accepted.</p> <p>Other aspects of the relief sought, particularly in relation to restoration of biodiversity, may not be realistic in relation to some environments (e.g. the Clutha River due to the presence of hydro dams).</p>

Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
			<p>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.</p> <p>[Page 791 of Summary]</p>		
Forest and Bird NZ	98/24	Chapter B2 – general requests	<ul style="list-style-type: none"> • Re word to read: "The values and life supporting capacity of Otago's natural and physical resources are recognised, maintained and enhanced." • Add objectives relating specifically to freshwater, beds of rivers lakes wetlands and their margins, coastal water, outstanding natural features and landscapes including seascapes, land and seascapes, natural character. <p>Add the following biodiversity objective:</p> <p>"Indigenous biodiversity in terrestrial, freshwater and coastal environments is maintained through protection, and is restored and/or enhanced where it has been lost or degraded so that the full range of naturally occurring ecosystems and habitats and their complement of flora and fauna is present across/characterises the region, and enhancement, and restoration particularly in places where biodiversity has been lost, or degraded."</p> <ul style="list-style-type: none"> • Add further objective: <p>"Human activity supports the healthy functioning and resilience of naturally occurring ecosystems including where integrated with production systems"</p> <ul style="list-style-type: none"> • 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 	Oppose	<p>The outcome, in terms of changes to the RPS, is not clear should the submission be accepted.</p> <p>Other aspects of the relief sought, particularly in relation to restoration of biodiversity, may not be realistic in relation to some environments (e.g. the Clutha River due to the presence of hydro dams).</p>

Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
			<p>this is important for Otago's identity and economy.</p> <ul style="list-style-type: none"> • Add similar Objective for the coastal ecosystems; "Coastal ecosystems and their life supporting capacity are protected and where degraded are enhanced and restored." <p>[Page 791 of Summary]</p>		
Environmental Defence Society Incorporated	127/24	Chapter B2 – general requests	<p>Include a chapter focused on freshwater and incorporate the necessary provisions [i.e.:</p> <ul style="list-style-type: none"> • Regionally significant issues relating to freshwater; • Objectives relating to freshwater, including provision for the environmental bottom lines in the NPSFM; • A freshwater management framework addressing water quality and quantity, as required under section CA of the NPSFM; • Policies and methods addressing the management of effects (including cumulative effects) of subdivision and development to reduce impacts on water quality and on water quantity; • Recognition and provision for the preservation of the natural character of wetlands, and lakes and rivers and their margins, and their protection from inappropriate subdivision, use and development; • Protection of all wetlands. <p>[Page 792 of Summary]</p>	Oppose	The outcome, in terms of changes to the RPS, is not clear should the submission be accepted.

Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
Environmental Defence Society Incorporated	127/24	Chapter B2 – general requests	<p>Develop specific measurable objectives addressing freshwater, and covering inter alia:</p> <ul style="list-style-type: none"> • The safeguarding of the life-supporting capacities, ecosystem process and indigenous species and their associated ecosystems of freshwater. • Avoiding further over-allocation and phasing out existing over-allocation. • Improving and maximizing the efficient allocation and efficient use of water. • Protecting significant values of wetlands and of outstanding freshwater bodies. <p>For example, see provisions attached in Annexure 2-A. [Page 792 of Summary]</p>	Oppose	The outcome, in terms of changes to the RPS, is not clear should the submission be accepted.
Environmental Defence Society Incorporated	127/24	Chapter B2 – general requests	<p>Include a chapter focused on Outstanding Natural Features and Landscapes (ONFLs) and incorporating the necessary provisions to respond to the specific submissions contained in EDS' submission [i.e.:</p> <ul style="list-style-type: none"> • Regionally significant issues relating to ONFLs; • 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.] <p>[Page 793 of Summary]</p>	Oppose	The outcome, in terms of changes to the RPS, is not clear should the submission be accepted.
Meridian Energy Ltd	82/30	Policy Suite 2.1 – The values of	Delete policies 2.1.1 and 2.1.2 and add the following	Support	Agree that the requirement for "protection" is too high a threshold.

Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
		natural resources are recognised, maintained or enhanced	<p>new policy:</p> <p>"Recognise the values of freshwater, and the beds of rivers, lakes, wetlands, and their margins, and manage them to:</p> <ul style="list-style-type: none"> a) Protect outstanding water bodies and wetlands; and b) Maintain or enhance the natural functioning of rivers, lakes, and wetlands, their riparian margins, and aquifers; and c) Maintain ecosystem health and indigenous biodiversity; and d) Retain the range and extent of habitats provided by freshwater; and e) Maintain migratory patterns of freshwater species, unless detrimental to indigenous biodiversity; and f) Maintain or enhance natural character; and g) Avoid aquifer compaction, and seawater intrusion in aquifers; and h) Maintain or enhance coastal values supported by freshwater values; and i) i) Maintain good water quality or enhance it where it has been degraded; and j) Retain the quality and reliability of existing drinking water supplies; and k) Maintain Kai Tahu values; and l) Provide for other cultural values; and m) Maintain important recreation values; and 	in part	The policies could be amended to address the issues raised in the submission rather than deleting them. Contact has lodged submissions in relation to these policies seeking changes of a slightly different nature.

Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
			<p>n) Maintain the landscape and amenity values of rivers,</p> <p>o) lakes, and wetlands; and</p> <p>p) Avoid the adverse effects of pest species, prevent their introduction and reduce their spread; and</p> <p>q) Mitigate the adverse effects of natural hazards, including flooding and erosion; and</p> <p>r) Maintain bank stability; and</p> <p>s) Maintain the ability of existing infrastructure to operate within their design parameter"</p> <p>Make any consequential amendments necessary to give effect to the relief sought.</p> <p>[Page 809 of Summary]</p>		
Forest and Bird NZ	98/31	Policy 2.1.1 – Managing freshwater values	<ul style="list-style-type: none"> • Re name title to read: <ul style="list-style-type: none"> • "Managing for healthy freshwater ecosystems", or • "Achieve healthy freshwater ecosystems" • Amend introductory text accordingly • Amend (a) to read: <p>"Ensure all water bodies and their margins have healthy ecosystems; and"</p> • Amend (b) to read: <p>"Retain the full range of habitats and indigenous species supported by freshwater."</p> • Retain (c) and (e) - (k) • Amend (d) to read: 	Oppose	Some of the provisions requested set too high and/or unrealistic thresholds due to the words "protect", "avoid" and "ensure", e.g. "Avoid changes in hydrology which could adversely affect indigenous biodiversity." This creates a zero effect outcome which is unrealistic in relation to the operation of hydro dams.

Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
			<p>"Protect migratory requirements for all life cycle stages of freshwater species, unless detrimental to indigenous species."</p> <ul style="list-style-type: none"> • Amend (l) to read: <p>"Protect recreation values"</p> <ul style="list-style-type: none"> • Add the following policies <p>"q) Avoid human induced erosion and sedimentation r) Ensure all water bodies are safe for human health and contact recreation s) Avoid changes in hydrology which could adversely affect indigenous biodiversity. t) Halt the decline of indigenous species u) Phase out the over allocation of freshwater that adversely affects water quality and in stream flows by 2035. v) Set limits and targets to achieve ecological health for all water bodies."</p> <p>[Page 814 of Summary]</p>		
Environmental Defence Society Incorporated	127/31	Policy 2.1.1 – Managing freshwater values	<ul style="list-style-type: none"> • Re-classify as a series of objectives identifying the key freshwater outcomes sought. Appropriate policies will [be] needed to complement each objective. • Amend the chapeau to identify the activities which need to be managed in order to achieve the outcomes sought in clauses (a) - (p). • Amend clause (c) to clarify that protection of the significant values of all wetlands is required. • Amend clause (g) to clarify the relationship between 	Oppose	<p>The outcome, in terms of changes to the RPS, is not clear should the submission be accepted.</p> <p>The suggested amendment to clause (p) to provide for the maintenance of existing infrastructure within freshwater limits needs to take into account the fact that existing infrastructure is designed (and consented) to operate</p>

Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
			<p>coastal and freshwater values, for example through identifying transition areas where fresh and coastal waters intersect.</p> <ul style="list-style-type: none"> • Amend clause (l) to refer to maintenance of water quality and other freshwater attributes such as flow, required for recreation purposes. • Amend clause (k) to refer to preventing pest species as far as possible. • Amend clause (p) to provide for the maintenance of existing infrastructure within freshwater limits. <p>[Page 820 of Summary]</p>		in a particular manner.
Forest and Bird NZ	98/42	Policy 2.2.1 – Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna	<ul style="list-style-type: none"> • Amend title to include terrestrial, freshwater and coastal sites. • Amend to read: "Identify and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna for terrestrial and freshwater environments using the criteria set out in Schedule 5 (being the schedule as amended by this submission)." • Add new (b) "Identify and protect areas of significant indigenous vegetation and significant habitats of indigenous fauna for coastal environments using the criteria set out in Schedule xx (being the schedule included in this submission in Appendix Two)." <p>[Page 871 of Summary]</p>	Oppose	The requirement to "protect" is too high a threshold to be applied in every situation.
Environmental Defence Society Incorporated	127/43	Schedule 5 – Criteria for the assessment of	<ul style="list-style-type: none"> • Retention of the 5 criteria headings. • Changes to align with, or substitution with EDS's 	Oppose	The criteria proposed are excessive and likely to be over-inclusive.

Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
		significant indigenous vegetation and habitat of indigenous fauna	preferred wording for - significant ecological areas criteria - significant ecological marine areas criteria [refer to submission]. [Page 871 of Summary]		
Transpower New Zealand Ltd	97/44	Policy 2.2.2 – Managing significant indigenous vegetation and significant habitats of indigenous fauna	Make similar amendments to the following changes suggested for Policy 2.2.4: “Protect, enhance and restore the values of outstanding natural features, landscapes and seascapes, by: a) avoiding, or where this is not practicable, remedying or mitigating adverse effects...; and b) avoiding, remedying or mitigating other adverse effects on other values; and;... ” [Page 878 of Summary]	Support	For the reasons stated in the primary submission.
Pioneer Generation Ltd	142/44	Policy 2.2.2 – Managing significant indigenous vegetation and significant habitats of indigenous fauna	That Policy 2.2.2 be adopted with the following amendments” “Protect and, where appropriate, enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna, by...” [Page 884 of Summary]	Support	For the reasons stated in the primary submission.
Shotover Country Ltd	131/46	Policy 2.2.4 – Managing outstanding natural features,	Amend as follows: “ Protect, enhance and restore <u>Manage subdivision, use and development that affects</u> the values of outstanding natural features, landscapes and	Support	For the reasons stated in the primary submission.

Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
		landscapes and seascapes	<p>seascapes, by:</p> <p>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</p> <p>...</p> <p>c) Assessing the significance of adverse effects on values, as detailed in Schedule 3; and</p> <p>...</p> <p><u>g) Recognising that appropriately designed and managed recreational activities in such locations can be appropriate, and can entail community benefits such as the enjoyment of landscapes values</u></p> <p><u>(h) Recognising that when activities have a functional need to locate within such places and emphasis on mitigating or remedying adverse effects rather than avoiding them may be appropriate".</u></p> <p>[Page 896 of Summary]</p>		
Environmental Defence Society Incorporated	127/48	Policy 2.2.6 – Managing special amenity landscapes and highly valued natural features	<p>Amend Policy 2.2.6 to:</p> <ul style="list-style-type: none"> • Comprise of objectives and policies. • Require avoidance of significant adverse effects of the values contributing to the identification of amenity landscapes, and to avoid, remedy or mitigate all other effects <u>on those values.</u> • Include addition policies identifying what activities (i.e. subdivision, use and development) need to be managed, and how in order to avoid significant adverse effects. 	Oppose	The outcome, in terms of changes to the RPS, is not clear should the submission be accepted.

Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
			See examples in Annexure 2-B of the EDS submission. [Page 909 of Summary]		
Environmental Defence Society Incorporated	127/55	Policy 2.2.13 – Managing outstanding water bodies and wetlands	Amend the RPS to: <ul style="list-style-type: none"> • Include specific freshwater objectives, including objectives relating to freshwater bodies and wetlands. • Require avoidance of permanent loss of 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. [Page 930 of Summary]	Oppose	The outcome, in terms of changes to the RPS, is not clear should the submission be accepted. A requirement to avoid all adverse effects is a zero effect regime and is not consistent with the RMA. A requirement to enhance freshwater bodies and wetlands may not be realistic.
Oceana Gold (New Zealand) Ltd	140/55	Policy 2.2.13 – Managing outstanding water bodies and wetlands	Amend "a) <u>Avoiding, remedying or mitigating significant...</u> " [Page 932 of Summary]	Support	For the reasons stated in the primary submission.
Aurora Energy Limited	76/98	Policy 3.4.1 – Integrating infrastructure with land use	Amend Policy 3.4.1 c) as follows "c) Manage <u>urban-growth...</u> " [Page 1007 of Summary]	Support	For the reasons stated in the primary submission.
Meridian Energy Limited	82/99	Policy 3.4.2 – Managing infrastructure	Amend b) as follows: "b) Reduce <u>Minimise</u> adverse effects of those activities	Support	For the reasons set out in the primary submission.

Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
		activities	as far as practicable, including cumulative adverse effects on natural and physical resources. [Page 1018 of Summary]		
Radio New Zealand Limited	57/100	Policy 3.4.3 – Designing lifeline utilities and facilities for essential or emergency services	Amend the policy as indicated below: Policy 3.4.3 Designing <u>Provide for</u> lifeline utilities and facilities for essential or emergency services Design <u>Provide for</u> lifeline utilities, and facilities for essential or emergency services, to be by : a) Maintaining their ability to function to the fullest extent possible, during and after natural hazard events; and b) <u>Taking into account</u> their operational co-dependence with other lifeline utilities and essential services to ensure their effective operation. [Page 1024 of Summary]	Support	For the reasons set out in the primary submission.
Transpower New Zealand Ltd	97/101	Policy 3.4.4 – Managing hazard mitigation measures, lifeline utilities, and essential emergency services	Amend as follows: "Protect the functioning of hazard mitigation measures, lifeline utilities, essential or emergency services, including by: a) Restricting the establishment of <u>any new</u> those activities... b) Avoiding significant adverse effects on <u>the operation</u> , maintenance and upgrading those measures... c) Avoiding, remedying or mitigating other adverse effects on <u>the operation, maintenance and upgrading</u>	Support	For the reasons set out in the primary submission.

Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
			these of utilities..." [Page 1028 of Summary]		
Waitaki Irrigators Collective Limited	113/103	Policy suite 3.5 – Infrastructure of national and regional significance is managed in a sustainable way	Recognise the national and regional importance of irrigation infrastructure within this suite of policies. [Page 1033 of Summary]	Oppose	The outcome, in terms of changes to the RPS, is not clear should the submission be accepted. While irrigation infrastructure has benefits in terms of agricultural production, it is not in the category of national significance in the same way as other infrastructure is under National Policy Statements (e.g. NPS for Renewable Electricity Generation 2011).
Fonterra Co-operative Group Limited	99/104	Policy 3.5.1 – Recognising national and regional significance of infrastructure	Retain Policy 3.5.1 as notified subject to the following amendments " Recognise the national and regional significance of <u>and provide for the continued operation of the following regionally and nationally significance infrastructure...</u> " [Page 1035 of Summary]	Support	For the reasons set out in the primary submission.
Fonterra Co-operative Group Limited	99/107	Objective 3.6 – Energy supplies to Otago's communities are secure and sustainable	Retain Objective 3.6 as notified. [Page 1054 of Summary]	Support	For the reasons set out in the primary submission.
Otago Water Resource Users Group	121/162	Policy suite 4.4 – Otagos communities can make the most of	Include the following new policy ahead of the existing policy 4.4.1: <u>"4.4.1A Managing water for consumptive use</u>	Oppose	The requested policy presupposes that water is available, which may not be the case on the basis that it has been allocated or is otherwise already being

Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
		the natural and built resources available for use	<p><u>When managing water:</u></p> <p>a) <u>Recognise that the consumptive uses of Otago's water require sufficient quantities of quality water; and</u></p> <p>b) <u>Recognise that significant historic investment reliant on water availability require sufficient quantities of quality water."</u></p> <p>[Page 1204 of Summary]</p>		used for other purposes.
Trustpower Limited	85/166	Objective 4.5 – Adverse effects of using and enjoying Otago's natural and built environment are minimised	<p>Amend Objective 4.5 as follows: "<u>Adverse effects arising from the development use of Otago's natural and physical resources are avoided, remedied or mitigated of using and enjoying Otago's natural and built environment are minimised</u></p> <p>[Page 1209 of Summary]</p>	Support	For the reasons set out in the primary submission.
Environmental Defence Society Incorporated	127/174	Policy 4.5.7 – Enabling offsetting of indigenous biodiversity	<ul style="list-style-type: none"> • 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. <p>[Page 1230 of Summary]</p>	Oppose	<p>The requested deletion of clause (a) is opposed on the basis that the functional necessity to locate in a significant or outstanding area is a relevant consideration.</p> <p>In other respects, the outcome, in terms of changes to the RPS, is not clear should the submission be accepted.</p>
Central Otago Environmental Society	59/175	Policy 4.5.8 – Offsetting for indigenous biodiversity	<p>Delete</p> <p>[Page 1233 of Summary]</p>	Oppose	Offsetting is recognised as an appropriate technique in certain circumstances.

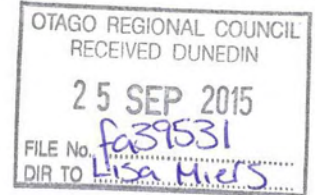
Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
Forest and Bird NZ	98/175	Policy 4.5.8 – Offsetting for indigenous biodiversity	Amend to read: "Provide for offsetting according to the framework set out in Appendix xxxx (Being that attached to this submission as Appendix One)" [Page 1234 of Summary]	Oppose	The additional criteria proposed restrict the opportunities to utilise offsetting, which may prevent beneficial environmental outcomes.
Environmental Defence Society Incorporated	127/175	Policy 4.5.8 – Offsetting for indigenous biodiversity	Add additional criteria to encapsulate all best practice offsetting principles. (See annexure 2-D of submission) [Page 1236 of Summary]	Oppose	The additional criteria proposed restrict the opportunities to utilise offsetting, which may prevent beneficial environmental outcomes.
Meridian Energy Ltd	82/239	AER 3.4 – Adverse effects on highly-valued resource values from nationally and regionally significant infrastructure	Amend as follows: Adverse effects on Otago's outstanding and highly-valued natural and physical resource values from nationally and significant infrastructure are avoided, <u>remedied, or mitigated, offset, or compensated.</u> Indicators: There is no net loss to <u>significant adverse effects on</u> the values of Otago's outstanding, significant, or high valued natural and physical resources resulting from nationally and regionally significant infrastructure, <u>and residual adverse effects on indigenous biodiversity are offset or compensated.</u> How Indicators can be measured: State of the environment monitoring, evaluation reports [Page 1304 of Summary]	Support	For the reasons set out in the primary submission.
Forest and Bird NZ	98/248	Appendices – general	Request for New Schedule: "Schedule XX Biodiversity Offsetting [Page 1306 of Summary]	Oppose	The additional criteria proposed restrict the opportunities to utilise offsetting, which may prevent beneficial environmental outcomes.

Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
Forest and Bird NZ	98/249	Glossary	<p>Add new definitions:</p> <ul style="list-style-type: none"> • "Biodiversity Offsets <p>Measurable conservation outcomes resulting from actions designed to compensate for residual adverse biodiversity impacts arising from project development after appropriate avoidance, minimisation, remediation and mitigation measures have been taken. The goal of biodiversity offsets is to achieve no net loss and preferably a net gain of biodiversity on the ground."</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> <p>[Page 1315 of Summary]</p>	Support	For the reasons set out in the primary submission.

Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
Royalburn Farming Company Ltd	102/249	Glossary	<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 facilities that provide essential community services; • Urban; ? • Regionally Significant Soil Resource - include all soil resources intended to be managed by the PRPS; • Regionally Significant Industry Activity - include any activity associated with tourism or primary production; • Hard mitigation measures; <p>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.</p> <p>[Page 1316 of Summary]</p>	Support in part	'Significant infrastructure' - for the reasons set out in the primary submission.
Director General of Conservation	117/249	Glossary	<ul style="list-style-type: none"> • Include the following definition of "biodiversity offsetting" as follows: <p>"Measurable conservation outcomes resulting from actions designed to compensate for significant residual adverse biodiversity impacts arising from project development after appropriate avoidance, minimisation, remediation and mitigation measures have been taken. The goal of biodiversity offsetting is to achieve no net loss and preferably a net gain of biodiversity on the ground."</p> <ul style="list-style-type: none"> • Include definition of "no net loss" as follows: "No 	Support	For the reasons set out in the primary submission.

Name of Submitter	Submitter Number	Section of RPS	Relief Sought	Support or Oppose	Reasons
			<p>overall reduction in biodiversity as measured by type, amount and condition." [Page 1319 of Summary]</p>		

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Federated Farmers of New Zealand

Further Submissions - Otago Regional Council Proposed Regional Policy Statement

25/09/2015



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Further Submissions - Otago Regional Council Proposed Regional Policy Statement

Name of submitter: Federated Farmers of New Zealand

Contact:

DAVID COOPER

DAVID COOPER

P 03 4777361

F 03 4790470

M 0274 755 615

E dcooper@fedfarm.org.nz

Address for service: Federated Farmers of New Zealand
PO Box 5242
Dunedin 9058
New Zealand

These are further submissions to the Otago Regional Council Proposed Regional Policy Statement.

I could not gain an advantage in trade competition through this submission.

We wish to be heard in support of our submission. If others make a similar submission, I will consider presenting jointly with them at a hearing.

Where Federated Farmers submitted on the same variation point as any other submitter it stands by its original submission.

This Further Submission provides Federated Farmers views on points raised by other submitters.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Central Otago Environmental Society	59	Whole Regional Policy Statement (overall approach)	Suggests the language of policies is strengthened to ensure "mitigation" and "off-setting" will not be used to betray those fundamental principles.	Oppose	Mitigation and off-setting are reasonable and effective tools where these result in meeting the social, cultural, environmental and economic outcomes desired.
Guardians of Lake Wanaka and Guardians of Lake Hawea	73	Whole Regional Policy Statement (overall approach)	Suggests a review of the outcomes to make them more tangible, measurable, and inspirational, as well as clarification around operational intent, and the relationship of the RPS to the ORC Long Term Plan and Regional City and District plans.	Oppose	Regional Policy Statements are intended to provide an overview of the resource management issues of the region and policies and methods to achieve integrated management of the natural and physical resources of the region. The submitter seeks that the RPS goes further than providing this overview. This would overstep the optimal role of the RPS, particularly given the varying community issues and preferences between Otago's TLAs.
McKeague Consultancy Ltd	89	Whole Regional Policy Statement (overall approach)	Amend all policies using the word "avoid", or delete the word "avoid" and replace with "minimise", given the potential impact of case law.	Support	There are a number of areas within the draft RPS where the words 'avoid', 'prevent' or 'require' occur. Given the potential implications of using these terms we ask Council to amend as sought.
McKeague Consultancy Ltd	89	Whole Regional Policy Statement (overall approach)	Add clarity as to whether, to be deemed "significant", resources need to meet all criteria or just one, in the relevant policies.	Support	Clarity is required.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Fonterra Co-operative Group Limited	99	Whole Regional Policy Statement (overall approach)	<p>Seeks to amend the RPS to clearly identify the regionally significant issues that need to be addressed and set out the objectives, policies and methods to address those issues.</p> <p>Seeks the PRPS is amended to set out a clear, coherent, integrated strategy focussing specifically on the management of natural and physical resources.</p> <p>Seeks that the PRPS 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.</p>	Support	Proposed amendments would provide greater clarity to plan users and better recognise the positive contribution of natural and physical resource use to the community.
Waitaki Irrigators Collective Limited	113	Whole Regional Policy Statement (overall approach)	Reconsider the use of the word "avoid" throughout the PRPS.	Support	There are a number of areas within the draft RPS where the words 'avoid', 'prevent' or 'require' occur. Given the potential implications of using these terms we ask Council to amend as sought.
Horticulture New Zealand	124	Whole Regional Policy Statement (overall approach)	Make amendments to better recognise the importance of food production in the Otago region.	Support	Would better recognise the positive contribution of natural and physical resource use to the community.
Oceana Gold (New Zealand)	140	Whole Regional Policy	Relating to the use of "avoid, enhance, maintain": Amend and/or ensure that the use of prescriptive terms like "avoid" are		There are a number of areas within the draft RPS where the words 'avoid', 'prevent' or 'require' occur. Given the potential implications

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Limited		Statement (overall approach)	what is actually intended.		of using these terms we ask Council to amend as sought.
Ravensdown Works Limited	143	Whole Regional Policy Statement (overall approach)	Amend the use of the term "Avoid", so that effects of inappropriate activity are avoided.	Support	There are a number of areas within the draft RPS where the words 'avoid', 'prevent' or 'require' occur. Given the potential implications of using these terms we ask Council to amend as sought.
Ravensdown Works Limited	143	Whole Regional Policy Statement (overall approach)	With regard to the use of the words "values" and "outcomes", amend to specify values and outcomes sought.	Support	Proposed amendments would provide greater clarity for plan and resource users.
Upper Clutha Conservation Taskforce	144	Whole Regional Policy Statement (overall approach)	Review and amend the language and rhetoric to be clear and precise. The use of the word "values" needs to be reviewed. Clearly define or replace the word "values".	Support	Proposed amendments would provide greater clarity for plan and resource users.
Remarkables Park Limited and Queenstown Park Limited	147	Whole Regional Policy Statement (overall approach)	Remove the policies to maintain and enhance resources that are not of regional significance, so that the RPS focuses on those resources that are of regional significance.	Support	Proposed amendments would provide greater clarity for plan and resource users.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Straterra	151	Whole Regional Policy Statement (overall approach)	<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	Proposed amendments would provide greater clarity for plan and resource users.
Dunedin City Council	156	Whole Regional Policy Statement (overall approach)	Enabling policies should be able to override more specific avoidance policies.	Support	The sought wording change would better enable TLAs to give full effect to the RPS where the term "avoid" is used in the context of enabling policies.
Central Otago District Council	37	Regionally significant issues	State the significant resource management issues for the Otago region.	Support	Agree that in the absence of those issues, the PRPS advances policies and methods which are best determined at a local and not regional level.
Dunedin City Council	156	Regionally significant issues	<ul style="list-style-type: none"> • Ensure that there is a more comprehensive identification and articulation of regionally significant issues and, where an issue is regionally significant, responsibilities are allocated appropriately through relevant methods, and consistency of language and terms. • Include more comprehensive identification and articulation of the regionally significant issues, 	Support	Agree there needs to be greater clarity and consistency of language regarding issues and responsibilities for them.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
			showing how these are to be addressed with the objectives and policies..		
Dunedin City Council	156	Introduction - Overview and the Otago Region	Provide further guidance on where an RPS sits within the wider planning framework.	Support	Proposed amendments would provide greater clarity for plan and resource users.
Dunedin City Council	156	Introduction - Overview and the Otago Region	Include a description of the geographical distribution of the people of Otago.	Oppose in part	While people are important, the primary focus is the management of resource use. We would not support any such amendment where it undervalued the importance of resource use in rural areas to the Otago region.
Fonterra Co-operative Group Limited	99	Introduction - RPS framework	Seeks amendments to the fourth outcome of the RPS Framework.	Support	Agree the sought amendments would provide greater clarity, and better acknowledgement of the benefits of the primary sector's resource use to the region.
AgResearch Ltd	116	Introduction - RPS framework	<ul style="list-style-type: none"> Seeks that the RPS identify "regionally significant issues" instead of "outcomes". Seeks the RPS include the following as a "regionally significant issue": <u>"Natural and physical resources need to be effectively and sustainably managed to fully realise the benefits of infrastructure and economic activities for the region's wellbeing (particularly the region's economic wellbeing)."</u> 	Support	Agree the sought after amendment will provide greater clarity, and that there is a need for the RPS to include a focus on encouraging future economic growth within the Otago Region.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Otago and Central South Island Fish and Game Councils	118	Introduction - RPS framework	Seeks amendment to the description of "Otago has high quality natural resources and ecosystems" (p.11) to elevate the importance of natural resources and their ecosystems.	Oppose	While the resilience and quality of natural resources and ecosystems is important, the ability to sustainably use these resources is also important. The sought amendment elevates the status of natural resources and ecosystems beyond what is required or reasonable for effective resource use.
Transpower New Zealand Limited	97	Introduction - The Treaty Partner	Seeks wording changes In "Expression of Te Tiriti o Waitangi".	Support in part	Federated Farmers initially submitted to retain the proposed wording; however we agree the submitter's suggested wording more appropriately reflects the role of Kai Tahu and recognises that some developments/use (e.g. nationally or regionally significant infrastructure) has to be located in specific areas.
Dunedin City Council	156	Introduction - The Treaty Partner	Seeks amendment to the first bullet point on page 7.	Support	Agree the sought amendment better reflects Kai Tahu rights in terms of consultation, and under the Treaty of Waitangi.
Central Otago District Council	37	Schedule 3 - Significance threshold	Delete Schedule 3.	Support	Agree with the submitter's concerns around the local implications of Schedule 3.
Royalburn Farming Company Ltd, Walter Peak Station,	102, 103, 104, 105, 106, 107,	Schedule 3 - Significance threshold	Delete Schedule 3 or amend as per suggested wording.	Support	Agree with the concerns expressed by these submitters around the implications of Schedule 3.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates Ltd, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Skifield Limited, Northlake Investments Limited, Shotover Country Limited, Ayrburn Farm Developments Limited, Bridesdale Farm Developments Limited, Glencoe	108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138				

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Station Limited, Treble Cone Investment Limited, Woodlot Properties Limited, Henley Downs Farm Holdings Limited, Real Journeys.					
Landpro Limited	150	Chapter B1 - general requests	<ul style="list-style-type: none"> • Supports objectives, policies and methods which ensure resource management decisions take Kai Tahu values into account whilst providing flexibility on the circumstances within which Kai Tahu will be engaged for more general resource management processes. • Supports policies and methods which avoid procedural duplication, delays and increases in costs where resource management decisions are required from a local authority. 	Support in part	Agree that it is important to ensure resource management decisions take Kai Tahu values into account, however it is important that there is some flexibility around what this involvement may mean for more general resource management processes, particularly given the potential for unnecessary duplication and delay leading to additional costs.
Te Runanga o Moeraki,	154	Outcome 1 and	Seeks amendment to Outcome 1 to provide for the 'availability' of 'high quality	Oppose	Providing 'availability of high quality resources unnecessarily and unfairly elevates the status

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga		introduction	resources' to Kai Tahu.		of Kai Tahu above other resource users, a particular concern given this is the high level resource management document for the Otago region.
Contact Energy Limited	74	Need 1.1	Suggests amendments to wording in paragraph 2 under "Need" under Objective 1.1 (p.16).	Support	Agree with the concerns around use of the words 'give effect to' and that it is important that the language used does not accidentally confuse the decision maker's obligations.
Otago Water Resource Users Group	121	Need 1.2	Suggests amendments to wording in statement associated to Objective 1.2 (p. 16).	Support	Agree with the concerns expressed by the submitter, particularly that <ul style="list-style-type: none"> - The provision currently implies that local authorities have not been sufficiently effective in recognising Kai Tahu values and plans. - "To recognise Kai Tahu plans" is too absolute and suggests the Kai Tahu plans are binding on local authority 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".
Otago Water Resource	121	Introduction to Objective 1.1	Seeks deletion of the paragraph within the introduction to Objective 1.1 which	Support in part	We have similar concerns as the submitter but consider these could be addressed in large

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Users Group			begins..."A partnership approach, which involves Kai Tahu..."		part by rewording the proposed introduction along the lines sought by the submitter, rather than deleting it altogether.
Alliance Group Limited, PowerNet Limited, HW Richardson Group Limited, Trustpower Limited	56, 60, 61, 85	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account.	Seeks amendments to Policy 1.1.2	Support	We agree with the amendments sought for the reasons expressed by these submitters. The RMA already obliges councils to maintain good working relationships with Kai Tahu when dealing with resource management issues.
Transpower New Zealand Limited	97	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account.	Seeks amendments to Policy 1.1.2	Support	Agree with the principle that Kai Tahu values, rights and interests are considered in the resource management process but do not consider that Kai Tahu should be elevated above all other parties, as not consistent with Part 2 RMA, in particular section 6-8.
Royalburn Farming Company Ltd, Walter Peak Station, Millbrook Country Club, Eastburn	102, 103, 104, 105, 106, 107, 108, 109, 129, 130,	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account.	Seeks amendments to Policy 1.1.2	Support	Wording should be consistent with RMA Part 2.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Farm, RCL Queenstown PTY Ltd, Damper Bay Estates Ltd, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Skifield Limited, Northlake Investments Limited, Shotover Country Limited, Ayrburn Farm Developmen ts Limited, Bridesdale Farm Developmen ts Limited, Glencoe Station Limited, Treble Cone Investment	131, 132, 133, 134, 135, 136, 137, 138				

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Limited, Woodlot Properties Limited, Henley Downs Farm Holdings Limited, Real Journeys.					
Otago Water Resource Users Group	121	Policy 1.1.2 - Taking the principles of The Tiriti o Waitangi into account.	Amend Policy 1.1.2 (e) and delete Policy 1.1.2 (f iii).	Support	Agree with submitter's concerns.
Dunedin City Council	156		Delete Policy 1.1.2 (b) and (f)(iii).	Support	Agree with submitter's concerns, particularly that Kai Tahu do not need to be involved in resource management decision-making or implementation processes. Statutory acknowledgements only require local authorities to put them on their plans, and treat Ngai Tahu as affected parties.
Otago Water Resource Users Group	121	Introduction to Objective 1.2	Delete the following paragraph from the introduction to Objective 1.2: "In addition to the ability to participate in decision-making and implementation."	Support	Agree that the decision for a local authority to transfer its functions, powers or duties to an iwi authority needs to be made by a local authority in regard to the particular circumstances and should not be a Regional Policy Statement

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
					direction.
Alliance Group Limited, PowerNet Limited, HW Richardson Group Limited, Trustpower Limited	56, 60, 61, 85	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	Suggests wording amendments to Objective 1.2.	Support	Agree that a requirement to "recognise and provide for" Kai Tahu values will provide a broader framework for the management of these values and that reference to "rights" should be deleted as the subsequent policies do not provide any further context around what specific "rights" are being referred to.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Objective 1.2 - Kai Tahu values, rights and interests and customary resources are sustained	"Kai Tahu values, rights and customary resources are <u>protected and enhanced</u> sustained."	Oppose	Suggested wording goes significantly beyond that intended.
Waitaki Irrigators Collective Limited	113	Policy 1.2.1 - Managing the natural environment to support Kai Tahu wellbeing	Amend to include wording such as "where appropriate and practicable".	Support	Agree that the intent of the policy should be supported, but that there may be instances where it is not possible or practicable for a resource in a particular site to support a customary use or values associated with it, and that there is little guidance as to how conflicting uses and values are to be resolved.
Te Runanga o Moeraki,	154	Policy 1.2.2 - Recognising	Seeks that Policy 1.2.2 is reworded to	Oppose	Inclusion of landscapes is not appropriate at this level; particularly if the intent is to 'protect'

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga		important sites of cultural significance to Kai Tahu	include landscapes.		these landscapes as sought by the submitter. This may have significant implications for reasonable resource use, particularly for primary producers.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	Policy 1.2.2 - Recognising important sites of cultural significance to Kai Tahu	Seeks the relocation of Policy 1.2.3 paragraphs a) - c) to Policy 1.2.2 and subsequent amendments to Policy 1.2.2.	Oppose	Inclusion of landscapes is not appropriate at this level; particularly if the intent is to 'protect' these landscapes as sought by the submitter. This may have significant implications for reasonable resource use, particularly for primary producers.
Royalburn Farming Company Ltd, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay	102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134,	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Seeks amendments to the wording of Policy 1.2.3.	Support	Agree that the proposed amendment better reflects the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development, and that the practicality of applying Schedule 3 efficiently is questionable.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Estates Ltd, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Skifield Limited, Northlake Investments Limited, Shotover Country Limited, Ayrburn Farm Developmen ts Limited, Bridesdale Farm Developmen ts Limited, Glencoe Station Limited, Treble Cone Investment Limited, Woodlot Properties	135, 136, 137, 138				

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Limited, Henley Downs Farm Holdings Limited, Real Journeys.					
Waitaki Irrigators Collective Limited	113	Policy 1.2.3 - Protecting important sites and values of cultural significance to Kai Tahu	Amend Policy 1.2.3 to include wording such as "where appropriate and practicable".	Support	Agree there may be instances where it is not possible or practicable for a resource in a particular site to support a customary use or values associated with it, and that there is little guidance as to how conflicting uses and values are to be resolved.
Waitaki District Council	70	Policy 1.2.4 - Enabling Kai Tahu relationships with wahi tupuna and associated sites	Delete: a) Facilitating Kai Tahu access to sites of cultural significance.	Support	Agree that access to sites on private land is a matter of negotiation between the landowner and those seeking access.
Dunedin City Council	156	Policy 1.2.4 - Enabling Kai Tahu relationships with wahi tupuna and associated sites	Delete Policy 1.2.4 a).	Support	Agree that Councils are unable to facilitate Kai Tahu access to sites of cultural significance through the District Plan.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Royalburn Farming Company Ltd, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates Ltd, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Skifield Limited, Northlake Investments Limited, Shotover Country Limited, Ayrburn Farm Developmen	102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Policy 1.2.5 - Enabling sustainable use of Maori land	Amend Policy 1.2.5	Support	Agree the focus should be on inappropriate subdivision, use and development.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
ts Limited, Bridesdale Farm Developmen ts Limited, Glencoe Station Limited, Treble Cone Investment Limited, Woodlot Properties Limited, Henley Downs Farm Holdings Limited, Real Journeys.					
Central Otago Environment al Society	59	Chapter B2 - general requests	Seeks amendment of the chapter.	Oppose	Many of the amendments sought go beyond both the chapter's intent and beyond what is required for sustainable management of the region's resources while at the same time providing for economic and social wellbeing.
Matthew Sole	75	Chapter B2 - general requests	Seeks amendment of the chapter.	Oppose	Many of the amendments sought go beyond both the chapter's intent and beyond what is required for sustainable management of the region's resources while at the same time providing for economic and social wellbeing.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Forest and Bird NZ	98	Chapter B2 - general requests	Seeks amendment of the chapter.	Oppose	Many of the amendments sought go beyond both the chapter's intent and beyond what is required for sustainable management of the region's resources while at the same time providing for economic and social wellbeing.
Fonterra Co-operative Group Limited	99	Chapter B2 - general requests	Seeks 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."	Support	Agree that protection and enhancement of resources that fall within the scope of section 6 of the Act is not warranted for resources of lesser importance, and that this additional objective provides clarity to other policies.
Landscape Connections Trust	123	Chapter B2 - general requests	Seeks a review of Objectives 2.1, 2.2 and 2.3, and related policies, 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.	Oppose	Oppose the inclusion of landscapes at this level. Further, the submitter provides no detail on the particular aspects sought from the review, simply that the wording is 'adequate'.
Environmental Defence Society	127	Chapter B2 - general requests	Include a chapter focused on freshwater and incorporate the necessary provisions.	Oppose	In terms of rural water quality, these concerns are addressed under the regional water plan (6a).

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Incorporated					
Environmental Defence Society Incorporated	127	Chapter B2 - general requests	Develop specific measureable objectives addressing freshwater.	Oppose	Addressed through the regional water plan.
Environmental Defence Society Incorporated	127	Chapter B2 - general requests	Include a chapter focused on Outstanding Natural Features and Landscapes (ONFLs)	Oppose	This is not a regionally significant issue to be addressed through the RPS.
Environmental Defence Society Incorporated	127	Chapter B2 - general requests	Include a chapter focused on the coastal environment and incorporating the necessary provisions	Oppose	Amendments sought go beyond what is required.
Remarkable s Park Limited and Queenstown Park Limited	147	Chapter B2 - general requests	[Reconsider] the value of including Objective 2.1 and associated policies, given that it appears to apply to all natural and physical resources, rather than those of regional or national significance.	Support	Agree there is a need for greater clarity around the objective.
Otago Peninsula Biodiversity Group	40	Outcome 2 and introduction	Preamble to the chapter lists economy first. Natural resources and ecosystems should be given higher priority.	Oppose in part	Agree in principle that without natural resources and ecosystems, there is no economy. However, the amendment sought unnecessarily devalues the importance of economic benefit derived from resource use.
Landscape Connections Trust	123	Outcome 2 and introduction	Seeks amendments to 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	Oppose	It is important that the RPS appropriately recognises the importance of resource use in providing for the Otago region's economic and

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
			the environment, and their protection, not on the use of the environment.		social wellbeing.
Horticulture New Zealand	124	Outcome 2 and introduction	Supports the recognition of primary production as an important sector and for the social and economic wellbeing of the community and the reliance on the quantity and quality of natural resources.	Support	It is appropriate to recognise these factors.
Matthew Sole	75	Issue 2.1 - Degradation of Otago's natural resources	Seeks a re-write of the issues relating to Objective 2.1 to specifically address a number of concerns.	Oppose	The purpose of the RPS is to promote the sustainable management of natural and physical resources, by providing an overview of the resource management issues facing Otago, and setting policies and methods to manage Otago's natural and physical resources. The amendments sought do not provide for balanced, sustainable management.
Forest and Bird NZ	98	Issue 2.1 - Degradation of Otago's natural resources	Seeks a re-write of the issues relating to Objective 2.1 to specifically address a number of concerns.	Oppose	The purpose of the RPS is to promote the sustainable management of natural and physical resources, by providing an overview of the resource management issues facing Otago, and setting policies and methods to manage Otago's natural and physical resources. The amendments sought do not provide for balanced, sustainable management.
Royalburn Farming Company Ltd, Walter	102, 103, 104, 105,	Issue 2.1 - Degradation of Otago's natural	Seeks amendments to the wording of Issue 2.1	Support	Agree that reference to natural values is appropriate.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates Ltd, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Skifield Limited, Northlake Investments Limited, Shotover Country Limited, Ayrburn Farm Developments Limited, Bridesdale Farm Developmen	106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	resources			

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
ts Limited, Glencoe Station Limited, Treble Cone Investment Limited, Woodlot Properties Limited, Henley Downs Farm Holdings Limited, Real Journeys.					
Otago and Central South Island Fish and Game Councils	118	Issue 2.1 - Degradation of Otago's natural resources	Seeks amendments to the wording of Issue 2.1	Support	Suggested wording provides greater clarity.
Otago and Central South Island Fish and Game Councils	118	Need 2.1	Seeks amendments to the "Need" statement associated to Objective 2.1 (p.24).	Oppose	Disagree that some of the matters covered could be considered to be of national importance.
Matthew	75	Issue 2.2 -	Re write the issues associated to	Oppose	An inventory along the lines sought by the

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Sole		Highly valued natural resources	Objective 2.2 to specifically address the lack of and inconsistent inventory and identification, recognition and protection of biodiversity values, significant indigenous vegetation and significant habitats of indigenous fauna, outstanding natural features and landscapes.		submitter would come at a staggering cost to marginal additional benefit.
Royalburn Farming Company Ltd, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates Ltd, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Skifield Limited, Northlake	102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Issue 2.2 - Highly valued natural resources	Seek amendment to the 2nd paragraph of the Issue.	Support	Amendment better reflects the RMA Part 2 direction in terms of protecting matters of national importance from inappropriate subdivision, use and development.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Investments Limited, Shotover Country Limited, Ayrburn Farm Developments Limited, Bridesdale Farm Developments Limited, Glencoe Station Limited, Treble Cone Investment Limited, Woodlot Properties Limited, Henley Downs Farm Holdings Limited, Real Journeys.					
Oceana Gold (New Zealand)	140	Issue 2.2 - Highly valued natural	Add to the end of the issue: "At the same time, the ability to undertake activities that affect or use these resources is	Support	Agree that Otago's significant and highly valued natural resources are a source of the region's development potential and need to be

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Limited		resources	fundamental to Otago's economic wellbeing."		able to be appropriately used.
Wise Response Society Inc.	114	Issue 2.3 - Interconnection of natural systems and resource management	Seek amendment to the wording associated with the Issue.	Oppose	Proposed wording does not provide for balanced and sustainable use of the environment for Otago's economic and social wellbeing.
The Fertiliser Association of New Zealand Inc.	110	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Amend Objective as follows: "The values of Otago's natural and physical resources are recognised, maintained and <u>or</u> enhanced."	Support	Agree that values cannot be both maintained and enhanced, and that rewording provides greater accuracy.
Otago and Central South Island Fish and Game Councils	118	Objective 2.1 - The values of natural resources are recognised, maintained or enhanced	Seeks amendment to the Objective, including that the value and life supporting capacity of Otago's natural and physical resources will be restored where they were degraded or lost.	Oppose in part	Restored provides no clarity (restored to what?) and may in some cases be impossible or come at an onerous cost. The intent is broadly covered by the word 'enhanced', the wording in the proposed plan does not hinder plans which sit underneath the RPS from restoring in situations where natural and physical resources are degraded.
Fonterra Co-operative Group Limited	99	Introduction to Objective 2.1	Seeks amendments to the explanatory text to Objective 2.1	Support	Agree that this better explains the nature of the issues affecting physical and natural resources, how these issues will affect the management of the resource and the approach that is to be taken.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
OSPRI	68	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Remove "avoid" from the clause "Avoid the adverse effects of pest species..." in policies 2.1.1 - 2.1.6 and ensure consistency with other policies which state that adverse effects need to be controlled. Clearly identify in the methods how this policy is to be given effect to.	Support	There are potentially significant impacts for rural landowners from this policy; the sought amendments would provide greater clarity around the nature and extent of these impacts.
Darby Planning LP	81	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Delete policies 2.1.1 and 2.1.2 and add a new policy (wording suggested by submitter)	Support	Agree there is duplication between the two policies, and that the protection requirements set too high a test.
Meridian Energy Limited	82	Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced	Delete policies 2.1.1 and 2.1.2 and add a new policy (wording suggested by submitter)	Support	Agree there is duplication between the two policies, and that the protection requirements set too high a test.
Dunedin City Council	156	Policy suite 2.1 - The values of natural resources are	Clearly identify in the methods exactly how each aspect of each policy will be given effect to.	Support	Greater clarity is required.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
		recognised, maintained or enhanced			
Egg Producers Federation of New Zealand	29	Policy 2.1.1 - Managing for freshwater values	An additional sub-clause be added to Policy 2.1.1 : "Policy 2.1.1g) - Ensure that the reasonable needs of existing water users for drinking water (including stock drinking water) can be met."	Support	Stock drinking water needs to be specifically provided for under this policy.
Matthew Sole	75	Policy 2.1.1 - Managing for freshwater values	The policy is re-named to read: "Managing for healthy freshwater ecosystems", with further amendments to the policy sought.	Oppose	The sought after amendments go significantly beyond what is required to provide for sustainable use of the environment.
McKeague Consultancy Ltd	89	Policy 2.1.1 - Managing for freshwater values	<ul style="list-style-type: none"> • Amend to provide greater clarity on how the [Water Plan's] Regionally Significant Wetlands fit with the concept [in Policy 2.1.1 (c)]. • Retain Policy 2.1.1 (d). • Replace "avoid" with "avoid and minimise" or "minimise" [in Policy 2.1.1 (n)]. 	Support	Sought amendments provide greater clarity.
The Fertiliser Association of New Zealand Inc.	110	Policy 2.1.1 - Managing for freshwater values	Seeks amendments to the policy wording.	Support	Sought amendments provide greater clarity.
Waitaki Irrigators Collective	113	Policy 2.1.1 - Managing for freshwater	Addition of the following words: "h) where appropriate maintain or enhance the natural functioning..."	Support	Amendments better provides for primary production and economic and social wellbeing.

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Limited		values	" q) support and provide for primary production values. "		
Peter and Margaret Hore	146	Policy 2.1.1 - Managing for freshwater values	Replace "avoid" with or "minimise" [in Policy 2.1.1 (n)].	Support	Agree with the submitter's concerns that: <ul style="list-style-type: none"> • "Avoid" is too restrictive, particularly if it results in a prohibited activity. • Unclear who has onus to avoid the adverse effects of pest species - land owner, ORC or source of the pest (e.g. forestry company). • "Avoid" is at odds with approach in Policy 4.5.5 which talks about controlling adverse effects.
Aurora Energy Limited	76	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Insert new clause (m) as follows: " (m) provide for the current and reasonably foreseeable future needs and cultural, economic and social wellbeing of people and the community by enabling the use and development of river and lake beds where appropriate."	Support	Agree that it is important to provide balance by having policies which provide for the use and development of river and lake beds, where this is appropriate. The current wording does not provide for growth and development opportunities in the Region, which are important for Otago's social and economic wellbeing.
Fonterra Co-operative Group Limited	76	Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins	Delete Policy 2.1.2.	Support	Agree the policy duplicates the matters set out under Policy 2.1.1 and appears to be within the scope of Clause a) of Policy 2.1.1.
Fonterra Co-	76	Policy 2.1.3 -	Amend Policy 2.1.3.	Support	The sought amendments provide greater

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
operative Group Limited		Managing for coastal water values			clarity around the policy and implications of that policy, as well as providing for reasonable and sustainable resource use.
Horticulture New Zealand	124	Policy 2.1.4 - Managing for air quality values	Amend Policy 2.1.4.	Support	There is a need to identify values and manage to these.
Alliance Group Limited, PowerNet Limited, HW Richardson Group Limited	56, 60, 61	Policy 2.1.5 - Managing for soil values	Amend Policy 2.1.5	Support	The policy does not suitably recognise that the use of soil resources can also be essential to the economic and social wellbeing of the region.
McKeague Consultancy Ltd	89	Policy 2.1.5 - Managing for soil values	Remove the word "avoid" and replace with "avoid or minimise" or "minimise" [in Policy 2.1.5 (k) and (l)].	Support	"Avoid" is too restrictive, particularly if it results in a prohibited activity status, and the policy is overly restrictive, unrealistic and impossible to implement and monitor
Peter and Margaret Hore	146	Policy 2.1.5 - Managing for soil values	Remove the word "avoid" and replace with "minimise" [in Policy 2.1.5 (k) and (l)].	Support	"Avoid" is too restrictive, particularly if it results in a prohibited activity status.
Te Runanga o Moeraki, Kati Huirapa Runaka ki	154	Policy 2.1.5 - Managing for soil values	Amend policy as follows: "g) Protect Kai Tahu values, <u>rights, interests and objectives</u> ,"	Oppose	Protection of interests and objectives goes beyond what is required and may be to the detriment of other resource users, particularly if these are not defined clearly in the plan.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Puketeraki, Te Runanga o Otakou and Hokonui Runanga					
Alliance Group Limited, PowerNet Limited, HW Richardson Group Limited	56, 60, 61	Policy 2.1.6 - Managing for ecosystem and indigenous biodiversity values	Delete this policy.	Support	If other policies provide for areas of significance or can be amended to provide for the concerns addressed under this policy we would favour not replicating these.
Fonterra Co-operative Group Limited	99	Policy 2.1.7 - Recognising the values of natural features, landscapes and seascapes	Delete this policy.	Support	The policy lacks any specific purpose or direction.
Fonterra Co-operative Group Limited	99	Schedule 4 - Criteria for the identification of natural features and landscapes	<ul style="list-style-type: none"> 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 	Support	Agree schedule 4 needs to be structured to make it clear that it is intended to be used for the purposes of identifying outstanding natural features and landscapes. Thresholds are needed in terms of size or rarity for associated policies.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
			<p>but which are not outstanding.</p> <ul style="list-style-type: none"> • Include a discussion of the purpose and application of the attributes set out (and ensure the attributes align with relevant case law principles such as those included in the modified Pigeon Bay criteria). • Include express reference to outstanding landscapes being in the context of section 6 of the Act (and not more generally). 		
Royalburn Farming Company Ltd, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates Ltd, Halfway Bay Station, Water Tight Investments	102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Schedule 4 - Criteria for the identification of natural features and landscapes	Delete schedule.	Support	We would rather these matters were addressed through district planning processes.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Ltd, Soho Basin Skifield Limited, Northlake Investments Limited, Shotover Country Limited, Ayrburn Farm Developments Limited, Bridesdale Farm Developments Limited, Glencoe Station Limited, Treble Cone Investment Limited, Woodlot Properties Limited, Henley Downs Farm Holdings Limited, Real					

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Journeys.					
Fonterra Co-operative Group Limited	99	Policy 2.1.8 - Recognising the values of natural character in the coastal environment	Delete Policy 2.1.8.	Support	Agree with the submitter's concerns that the policy lacks any specific purpose or direction.
Alliance Group Limited	56	Objective 2.2 - Otago's significant and highly valued natural resources	Amend as follows: "Otago's significant and highly-valued natural resources are identified, and protected or enhanced <u>from inappropriate use or development</u> ."	Support	Current policy is unnecessarily restrictive.
Horticulture New Zealand	124	Objective 2.2 - Otago's significant and highly valued natural resources	Amend as follows: "Otago's significant and highly values natural resources are identified, and <u>managed to maintain or enhance the resource</u> protected or enhanced. "	Support	Current policy is unnecessarily restrictive.
Aurora Energy Limited	76	Introduction to Objective 2.2	Amend the introduction to Objective 2.2 (p.32) as follows: "Otago has many unique landscapes, natural features and areas of indigenous biodiversity which are nationally or regionally important. <u>These resources should be maintained and where appropriate enhanced. Giving</u>	Support	Agree the objective too restrictive and generic and that the focus should be to identify such resources, and to maintain and, where appropriate, enhance the values that contribute to the significance of the resource.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
			these a higher level of protection ensures they will be retained, while consumptive use of resources will be directed to areas where adverse effects are more acceptable."		
Dunedin City Council	156	Policy suite 2.2 - Otago's significant and highly valued natural resources	Consider combining Policies 2.2.6 and 2.2.4.	Support	Policies 2.2.6 and 2.2.4 (a) — (f) are identical, and could be simplified and streamlined by combining into a single policy
Alliance Group Limited, PowerNet Limited, HW Richardson Group Limited	56, 60, 61	Policy 2.2.1 - Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna	Amend as follows: "Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna <u>at a regional level.</u> "	Support	It is appropriate that those areas within the region that are significant are identified at the regional level.
Oceana Gold (New Zealand) Limited	140	Schedule 5 - Criteria for the assessment of significant indigenous vegetation and habitat of indigenous	<ul style="list-style-type: none"> • Amend to include another criteria: "<u>6. Size and Scale.</u>" • Clarify what is meant by the note beneath the Schedule. • Ensure it satisfies the requirements in s32 of the Act. 	Support	Clarifies the intent and implications of the schedule.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
		fauna			
Central Otago District Council	37	Policy 2.2.2 - Managing significant indigenous vegetation and significant habitats of indigenous fauna	Delete 2.2.2 c)	Support	Agree that the clause is unnecessary and inappropriate.
Central Otago District Council	37	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Amend Policy 2.2.3 as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes using the attributes as detailed in Schedule 4 ."	Support	Otago TLAs should retain the ability to develop their own criteria.
Fonterra Co-operative Group Limited	99	Policy 2.2.3 - Identifying outstanding natural features, landscapes and seascapes	Seeks amendments to Policy 2.2.3	Support	Agree policy requires amendment to ensure consistency of terminology used in Section 6 of the Act, and that neither Schedule 4 or this policy define thresholds in terms of size or rarity.
Royalburn Farming Company	102, 103, 104,	Policy 2.2.3 - Identifying outstanding	Amend as follows: "Identify areas and values of outstanding natural features, landscapes and seascapes, using the	Support	Schedule 4 risks inefficiencies and adds little.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Ltd, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates Ltd, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Skifield Limited, Northlake Investments Limited, Shotover Country Limited, Ayrburn Farm Developments Limited, Bridesdale Farm	105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	natural features, landscapes and seascapes	attributes as detailed in Schedule 4 . "		

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Developments Limited, Glencoe Station Limited, Treble Cone Investment Limited, Woodlot Properties Limited, Henley Downs Farm Holdings Limited, Real Journeys.					
Central Otago District Council	37	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Delete 2.2.4 c)	Support	Agree the clause is unnecessary.
HW Richardson Group Limited	61	Policy 2.2.4 - Managing outstanding natural features, landscapes	Delete this policy or amend clause a) as follows: "a) Avoiding <u>significant</u> adverse effects on those values which contribute to the significance of the natural feature, landscape or seascape; and"	Support	The clause leaves no room to provide for important physical resources such as activities common in areas of outstanding value.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
		and seascapes			
McKeague Consultancy Ltd	89	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	<ul style="list-style-type: none"> • Replace "avoid" with "avoid and minimise" or "minimise" [in Policy 2.2.4 (a)]. • Delete [Policy 2.2.4] (b). 	Support	"Avoid" is too restrictive; Policy 2.2.4 (b) may lead to confusion.
Peter and Margaret Hore	146	Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes	Replace "avoid" with "minimise" [in Policy 2.2.4 (a)].	Support	"Avoid" is too restrictive.
Central Otago District Council	37	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	Amend Policy 2.2.5 as follows: "Identify areas and values of special amenity landscape or natural features which are highly valued for their contribution to the amenity or quality of the environment, but which are not outstanding , using the attributes detailed in Schedule 4 ."	Support	Requiring TLAs to use schedule 4 goes beyond what is required.
Fonterra Co-operative Group	99	Policy 2.2.5 - Identifying special	Make better reference to the meaning of outstanding as follows: "Identify areas and values of special amenity landscape or	Support	The PRPS requires amendment to ensure that the values of landscapes and features are identified in a consistent manner, having

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Limited		amenity landscapes and highly valued natural features	natural features ... which are not outstanding <u>for the purposes of section 6 of the Resource Management Act 1991</u> , using the attributes detailed in Schedule 4."		regard to their regional significance.
Royalburn Farming Company Ltd, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates Ltd, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Skifield Limited, Northlake Investments Limited,	102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Policy 2.2.5 - Identifying special amenity landscapes and highly valued natural features	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 ." "	Support	Requiring TLAs to use schedule 4 goes beyond what is required.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Shotover Country Limited, Ayrburn Farm Developments Limited, Bridesdale Farm Developments Limited, Glencoe Station Limited, Treble Cone Investment Limited, Woodlot Properties Limited, Henley Downs Farm Holdings Limited, Real Journeys.					
Central Otago District Council	37	Policy 2.2.6 - Managing special amenity landscapes	Delete policy 2.2.6 c).	Support	Appears unnecessary to include this level of detail in respect to the matter and appropriate for TLAs to establish their own rules for management, particularly as this policy seeks to protect landscapes and features that are not

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
		and highly valued natural features			deemed to be "outstanding".
PowerNet Limited, HW Richardson Group Limited	60, 61	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Delete this policy or rewrite to focus more on the maintenance of amenity landscapes.	Support	Appears unnecessary to include this level of detail in respect to the matter and appropriate for TLAs to establish their own rules for management, particularly as this policy seeks to protect landscapes and features that are not deemed to be "outstanding".
Fonterra Co-operative Group Limited	99	Policy 2.2.6 - Managing special amenity landscapes and highly valued natural features	Amend the Policy to read: <u>"Manage Protect or enhance the values of special amenity landscapes and highly valued natural features, by:</u> a) Avoiding, remedying or mitigating significant adverse effects on those values which contribute to the special amenity of the landscape or high value of the natural feature; and ..." • <u>Delete (b).</u> • <u>Retain (c) to (f).</u>	Support	It is more important to manage the values of special amenity landscapes than attempting to 'protect or enhance' these.
Fonterra Co-operative Group Limited	99	Policy 2.2.8 - Identifying areas of high and outstanding natural character in	Delete Policy 2.2.8.	Support	Agree this provides no specific policy direction and duplicates matters that are within the scope of Policy 2.2.3

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
		the coastal environment			
Fonterra Co-operative Group Limited	99	Policy 2.2.9 - Managing the natural character of the coastal environment	Delete Policy 2.2.9.	Support	Agree this duplicates matters that are within the scope of Policy 2.2.4.
Fonterra Co-operative Group Limited	99	Policy 2.2.12 - Identifying outstanding water bodies and wetlands	Delete Policy 2.2.12.	Support	Agree this duplicates matters that are within the scope of Policy 2.2.3.
Oceana Gold (New Zealand) Limited	140	Policy 2.2.12 - Identifying outstanding water bodies and wetlands	<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. 	Support	Greater clarity and certainty is required.
McKeague Consultancy Ltd	89	Policy 2.2.13 - Managing outstanding water bodies and wetlands	<ul style="list-style-type: none"> • Replace "avoid" with "avoid and minimise" or "minimise" [in Policy 2.2.13]. • Delete [Policy 2.2.13] (b). 	Support	Agree that "avoid" is too restrictive, and that paragraph (b) of the policy adds nothing to what is already in the RMA and is unnecessary.
Fonterra Co-operative Group	99	Policy 2.2.13 - Managing outstanding	Delete Policy 2.2.13.	Support	Agree this duplicates matters that are within the scope of Policy 2.2.4.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Limited		water bodies and wetlands			
Alliance Group Limited, PowerNet Limited, HW Richardson Group Limited	56, 60, 61	Policy 2.2.14 - Identifying highly valued soil resources	Delete this policy.	Support	Agree the policy appears to be an unnecessary duplication of the matters contained within Policy 2.1.5.
AgResearch Ltd	116	Policy 2.2.15 - Managing highly valued soil resources	<p>Amend as follows:</p> <p>“Protect the values of areas of highly valued soil resources, by: ...</p> <p>d) Recognising that urban expansion may be appropriate due to location and proximity to existing urban development and infrastructure <u>while avoiding reverse sensitivity effects on rural production activities (unless there is no other suitable land available adjacent to existing urban areas),”</u></p> <p>add the following new clauses:</p> <p><u>“ e) Avoiding the use of highly values soils for rural residential purposes unless identified as part of a district growth strategy.</u></p> <p><u>f) Ensuring that land use activities on</u></p>	Support	We are seeking balanced management of valued soil resources. This does not require protection, but reasonable and appropriate use of the soils. We support the proposed re-wording but would seek to ensure there is sufficient scope for district planning approaches to develop specific rules in response to local challenges.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
			<u>highly valued soils are consistent with the continued use of such soils in the vicinity for primary production purposes (e.g. there is a functional need for the activity to be established in rural areas)."</u>		
Alliance Group Limited	56	Objective 2.3 - Natural resource systems and their interdependencies are recognised	Amend this objective so it seeks to achieve the integrated management of the natural and physical resources of the region, including consideration of economic benefits.	Support	Agree with the submitter that <ul style="list-style-type: none"> • The policies for this objective all relate to integrated management. • The human use and economic benefits from development of natural and physical resources also need to be considered. • The current drafting of the objective fails to achieve this as it only refers to natural resource systems.
Horticulture New Zealand	124	Policy suite 2.3 - Natural resource systems and their interdependencies are recognised	Include provisions to recognise the interdependency of the soil resource with other attributes such as water availability.	Support	Agree that soil resources do not exist in isolation from the range of other attributes that are essential for the soil resource to be able to be used to its potential.
Alliance Group Limited, PowerNet Limited, HW	56, 60, 61	Policy 2.3.1 - Applying an integrated management approach among	Delete this policy.	Support	The intended purpose or outcome of this policy is not clear. <ul style="list-style-type: none"> • It is inappropriate to try to manage resources in an integrated manner when only focusing on one resource.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Richardson Group Limited		resources			<ul style="list-style-type: none"> 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.
The Fertiliser Association of New Zealand Inc.	110	Policy 2.3.3 - Applying an integrated management approach for freshwater catchments	<p>Amend Policy 2.3.3 as follows:</p> <p>"Apply an integrated management approach to activities in freshwater catchments, by:</p> <p>...</p> <p>c) Coordinating the management of land use and freshwater, to:</p> <p>i. Maintain or enhance improve, where <u>degraded by human activities to the point of being over-allocated</u>, freshwater values; and</p> <p>ii. Maintain or enhance improve, where <u>degraded by human activities to the point of being over-allocated</u>, the wetland values; and</p> <p>iii. <u>Maintain or enhance, where degraded, the soil resource values; and</u></p> <p>iii- <u>iv.</u> Maintain or enhance the values of beds of rivers and lakes, wetlands, and their margins; and</p> <p>iv- <u>v.</u> Reduce-Manage the potential for health and nuisance effects."</p>	Support	<p>Agree with the submitter that:</p> <ul style="list-style-type: none"> there is no guidance on when 'maintain' will be preferred over 'enhancement'. Policies 2.3.3, 2.3.4 and 2.3.5 refer to 'reducing' the potential for health and nuisance effects. This is not always feasible or necessary to 'reduce' and the wording of the policies should be amended to reflect a more realistic approach of 'managing' the potential for effects.
Horticulture	124	Policy 2.3.3 -	Amend Policy 2.3.3 as follows:	Support	Agree that the mention of nuisance effects is

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
New Zealand		Applying an integrated management approach for freshwater catchments	<ul style="list-style-type: none"> • “c) iv. Reduce the potential for health and nuisance effects.” • Add a new point “<u>d) Provide for food production.</u>” 		concerning as this is not well defined and may trigger a number of immaterial matters. It is important to provide for food production for the social and economic wellbeing of Otago and to balance restrictions on land use.
Alliance Group Limited, PowerNet Limited, HW Richardson Group Limited	56, 60, 61	Policy 2.3.4 - Applying an integrated management approach for the coastal environment	Amend to recognise that in achieving integrated management the human use and economic values of the resource should also be taken into account.	Support	It is important to recognise and provide for the human use (i.e. economic and community) values of resources in the integrated management of natural and physical resources.
Horticulture New Zealand	124	Policy 2.3.4 - Applying an integrated management approach for the coastal environment	Amend as follows: “b) ii. Reduce the potential for health and nuisance effects”.	Support	It is unclear why nuisance effects are included. Nuisance effects are not defined in the RMA and may capture many activities unnecessarily.
Horticulture New Zealand	124	Policy 2.3.5 - Applying an integrated management approach for airsheds	Amend as follows: “b) ii) Reduce the potential for adverse health and nuisance effects.”	Support.	It is unclear why nuisance effects are included. Nuisance effects are not defined in the RMA and may capture many activities unnecessarily.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Fonterra Co-operative Group Limited	99	Outcome 3 and introduction	<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.</p> <p>Ensuring Otago's communities <u>need to be maintained and develop[ed]</u> in a resilient way having regard to:</p> <p><u>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);</u></p> <p><u>b) environmental constraints and the effects of activities on the environment;</u> and</p> <p><u>c) the need for communities to be are designed in way which helps us to prepare for, respond, recover and adapt to such disruptions,</u> will help make Otago's communities <u>more</u> resilient."</p>	Support	Agree that communities also face challenges in terms of access to resources to provide for their economic and social well-being.
Egg Producers Federation of New Zealand	29	Policy 3.3.2 - Adapting to, or mitigating the effects of, climate	<p>Add a sub-clause to Policy 3.3.2 as follows: <u>Policy 3.3.2.d)</u></p> <p><u>Acknowledging that some activities are more resilient and able to adapt to the effects of climate change.</u></p>	Support	It is important that the regulatory response is aligned to risk, and that some activities are identified as being more resilient to climate change.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
		change			
Horticulture New Zealand	124	Policy 3.4.1 - Integrating infrastructure with land use	Add an additional point "b) <u>viii: Effects existing uses.</u> "	Support	It is important for the policy to also recognise the existence of other land uses.
Dunedin City Council	156	Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	<ul style="list-style-type: none"> Amend the objective, issue and need to clarify why these provisions should only apply to regionally and nationally significant infrastructure (as defined in Policy 3.5.1), and not locally important public (or even all) infrastructure. Alternatively, recognise locally important infrastructure in a similar manner in the objective and related provisions. 	Support	It is important that nationally or regionally significant is treated differently to lesser important or local infrastructure.
Horticulture New Zealand	124	Policy suite 3.5 - Infrastructure of national and regional significance is managed in a sustainable way	Include a new policy with criteria to assist with how national and regional significance will be determined.	Support	It is unclear how national and regional significance will be determined.
Aurora Energy	76	Policy 3.5.1 - Recognising	Amend b) as follows: "b. Electricity transmission and <u>distribution</u> "	Oppose	Distribution is not a matter of national significance under the National Policy

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Limited		national and regional significance of infrastructure	<u>infrastructure</u> ; and".		Statement for Electricity Transmission (NPSET) and should not be regarded as being of regional significance for the purpose of the PRPS.
Transpower New Zealand Limited	97	Policy 3.5.1 - Recognising national and regional significance of infrastructure	Amend as follows: "Recognise the national and regional significance of the following infrastructure <u>by facilitating the operation, maintenance and upgrade of existing facilities and the establishment of new resources to meet the needs of present and future generations</u> : ... <u>b) The National Grid Electricity transmission infrastructure</u> ; and ..."	Support in part	Federated Farmers supports the submitter's perspective that the PRPS should only provide for the National Grid as defined under the National Policy Statement for Electricity Transmission (NPSET), and that the operation and maintenance of the National Grid should be facilitated. However, we do not believe the PRPS should facilitate the 'upgrading' of the National Grid, as this may have an impact on otherwise legitimate land uses and with the potential adverse effects of upgrading considered on a case by case basis.
Transpower New Zealand Limited	97	Policy 3.5.3 - Protecting infrastructure of national or regional significance	Seeks amendments to Policy 3.5.3 to better reflect the NPSET.	Oppose in part	While we agree that the wording of the policy should be amended to better reflect the NPSET, if adopted (either in whole or in part) the proposed policy should make reference to 'incompatible' activities and should include a degree of significance so as to ensure that reasonable land uses (for instance pastoral farming and associated activities) are not captured where they have no or little impact on the operation or maintenance of the National Grid.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Transpower New Zealand Limited	97	Policy suite 3.6 - Energy supplies to Otago's communities are secure and sustainable	Seeks the introduction of a new policy intended to protect the National Grid.	Oppose	<p>Large portions of the National Grid exists on privately owned land, including primary production land. The National Grid can have significant adverse effects of this on the private landowner and primary production. Given these impacts, while it is important to facilitate the operation and maintenance of the National Grid as required by the NPSET it is also important not to undermine the legitimate concerns of landowners.</p> <p>We oppose the submitter's proposed policy and would seek that Policy 3.6.5 (Protecting electricity distribution infrastructure) is instead rewritten to specify the policy relates only to the National Grid as defined in the NPSET.</p>
Waitaki Irrigators Collective Limited	113	Policy 3.6.3 - Protecting the generation capacity of renewable electricity generation activities	<p>Insert the following:</p> <p>"d) ... Schedule 3; <u>provided that</u></p> <p><u>e) any adverse effects on other industries are avoided, or where this is not practicable, remedied or mitigated.</u> "</p>	Support	<p>We agree that</p> <ul style="list-style-type: none"> • It is inappropriate to elevate the status of hydro-electricity generation over other uses of freshwater. • This policy could have significant impacts on other resource users: the operation of hydro-generation facilities will necessarily impact those industries that operate downstream of the generation infrastructure. <p>Given the potential for these impacts and the significant social and economic benefits of primary production to the region it is relevant that the potential impacts of the use of freshwater for hydro-electricity on primary</p>

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
					production are appropriately considered.
Horticulture New Zealand	124	Policy 3.6.5 - Protecting electricity distribution infrastructure	<p>Amend as follows:</p> <p>"Managing Protect electricity distribution infrastructure, by:</p> <p>...</p> <p>c) <u>Ensuring existing land uses are not penalised by location of electricity distribution infrastructure</u> Avoiding, remedying or mitigating adverse effects from other activities on the functional needs of that infrastructure; and</p> <p>...</p> <p>e) <u>Protect infrastructure corridors for nationally important infrastructure needs, recognising the existing land uses through which they pass</u> Protecting existing distribution corridors for infrastructure needs, now and for the future."</p>	Support	<p>We agree that Policy 3.6.5 appears to apply to all electricity distribution infrastructure, whether nationally significant or not, and that it is not appropriate to apply the same level of "protection" to all infrastructure as it places a priority over existing land uses which can be adversely affected by the location of electricity distribution infrastructure.</p> <p>Large portions of the National Grid exists on privately owned land, including primary production land. The National Grid can have significant adverse effects of this on the private landowner and primary production. Given these impacts, while it is important to facilitate the operation and maintenance of the National Grid as required by the NPSET it is also important not to undermine the legitimate concerns of landowners.</p> <p>We seek that Policy 3.6.5 (Protecting electricity distribution infrastructure) is instead rewritten to specify the policy relates only to the National Grid as defined in the NPSET.</p>
Alliance Group Limited, PowerNet Limited, HW	56, 60, 61	Objective 3.8 - Urban growth is well designed and integrates effectively with adjoining	Retain the objective as notified (or similar wording to achieve relief).	Support	Agree that it is appropriate that urban development takes place in a manner which takes into account the existing environment and minimises potential conflicts between incompatible activities.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Richardson Group Limited		urban and rural environments			
Clutha District Council	28	Schedule 8 - Urban Growth Boundaries	Remove Schedule 8	Support	Schedule 8 is unpopulated and provides no certainty. Federated Farmers favours TLAs being given sufficient scope and discretion to address the challenge of urban growth through district planning processes.
Waitaki District Council	70	Schedule 8 - Urban Growth Boundaries	Delete.	Support	Schedule 8 is unpopulated and provides no certainty. Federated Farmers favours TLAs being given sufficient scope and discretion to address the challenge of urban growth through district planning processes.
Darby Planning LP	81	Policy 3.8.3 - Managing fragmentation of rural land	<p>Amend Policy 3.8.3, as follows:</p> <p><u>"To enable Manage</u>-subdivision, use and development of rural land, <u>where the adverse effects are avoided, remedied or mitigated, having regard to:</u></p> <p>a) Avoid development or <u>The</u> fragmentation of land which undermines or forecloses the potential of rural land:</p> <p>...</p> <p>b) Have particular regard to whether the proposal will result in a loss of the productive potential of highly versatile soil, unless:</p> <p>...</p> <p>c) Avoid unplanned demand for <u>The</u></p>	Support in part	<p>Federated Farmers supports the intent to address reverse sensitivity issues in the rural area. However, the initial policy was too restrictive and appeared to unnecessarily capture some instances activities which are not incompatible were captured.</p> <p>In the first instance, Federated Farmers would favour deletion of the rule with individual TLAs addressing these issues through district planning processes. However, the amended wording suggested by the submitter better provides for TLAs to assess the range of necessary factors and provide for subdivision where appropriate.</p>

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
			provision of infrastructure, including domestic water supply and waste disposal; and d) Avoid creating competing demand for water or other resources;"		
Peter and Margaret Hore	146	Policy 3.8.3 - Managing fragmentation of rural land	Amend (d) to make it clearer that primary production is one of the key priority uses for water and soil.	Support	Federated Farmers agrees that if it is intended that priority in rural areas is for water and soil to be used for primary production, then more clarity is needed.
The Fertiliser Association of New Zealand Inc.	110	Objective 3.9 - Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend as follows: "Objective 3.9 Hazardous substances and waste materials do not harm human health or the quality of the environment in <u>Otago result in significant adverse effects on the health and the safety of people or the environment</u> "	Support	The amended wording proposed by the submitter retains the initial intent but includes a necessary degree of significance and provides greater clarity.
Horticulture New Zealand	124	Policy 3.9.1 - Integrating management of hazardous substances and waste	<ul style="list-style-type: none"> Clarify what "other values" will be considered under Policy 3.9.2 c). Amend Clause e) by adding: "<u>except for agrichemicals and fertilisers as part of primary production activities</u>". Add a new clause: "g) <u>Provide for the use and disposal of agrichemicals and</u> 	Support	<p>Use of some substances regarded as hazardous substances are important to primary production, particularly agrichemicals and fertilisers.</p> <p>The proposed amendments would require primary producers to make use of best practice without attempting to enshrine best practice in the RPS, allowing for 'best practice' to adapt as needed.</p>

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
			<p><u>fertilisers as part of primary production activities through using best practice.</u></p> <p>• Add a new clause: <u>“h) Recognise the positive effects that can be derived from use of hazardous substances.”</u></p>		
Horticulture New Zealand	124	Policy 3.9.3 - Identifying contaminated land	Delete “ potentially contaminated land ” from Policy 3.9.3.	Support	Agree with the submitter that identification of contaminated land is supported, but that there is a significant difference between determining “potentially contaminated land” and addressing known contaminated land. The whole of the rural area in Otago could be identified as “potentially contaminated land” if some criteria are applied.
The Fertiliser Association of New Zealand Inc.	110	Policy 3.9.4 - Managing the use of contaminated land	<p>Amend as follows:</p> <p>“Policy 3.9.4 Managing the use of contaminated land</p> <p>Manage the use of contaminated land, to protect people and the environment from adverse effects, by:</p> <p>...</p> <p>b) Where there is contamination <u>contaminated land</u>:</p> <p>i. Requiring an assessment of associated environmental risks; and</p> <p>ii. Remediating land; and</p> <p>...”</p>	Support	The term 'contamination' is poorly defined, and contamination does not always have the same meaning as 'contaminated land' and does not always require an assessment of risk or remediation.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Dunedin City Council	156	Policy 3.9.4 - Managing the use of contaminated land	Consider if this policy is necessary.	Support	Agree with the submitter's view that as there is an NES for Assessing and Managing Contaminants in Soil to Protect Human Health it is necessary to assess whether an RPS policy necessary and what this adds.
Alliance Group Limited, PowerNet Limited, HW Richardson Group Limited	56, 60, 61	Policy 3.9.5 - Avoiding the creation of new contaminated land	Delete the policy.	Support	It is not clear what implications this policy might have on development throughout the Region, and the policy could be interpreted that facilities that use hazardous substances will become sites of contaminated land and therefore should be avoided.
The Fertiliser Association of New Zealand Inc.	110	Policy 3.9.6 - Encouraging use of best management practices for hazardous substance use	Amend as follows: "Policy 3.9.6 Encouraging use of best management practices for hazardous substance use Encourage the use of best management practices to prevent-avoid, remedy or mitigate adverse effects of the use of hazardous substances on the environment, including reducing their use <u>and on the health and safety of people.</u> "	Support	Provides clarity that the purpose of the policy is to protect human health.
Royalburn Farming Company	102, 103, 104,	Chapter B4 - general requests	Add an Objective and subsequent policies to recognise and provide for industry and primary production.	Support	The economic and social benefits of primary production are vital for the wellbeing of Otago's communities.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Ltd, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates Ltd, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Skifield Limited, Northlake Investments Limited, Shotover Country Limited, Ayrburn Farm Developments Limited, Bridesdale Farm	105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138				

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Developments Limited, Glencoe Station Limited, Treble Cone Investment Limited, Woodlot Properties Limited, Henley Downs Farm Holdings Limited, Real Journeys.					
Fonterra Co-operative Group Limited	99	Policy 4.1.1 - Maintaining and enhancing public access	Include an additional clause to read: <u>"Ensure a level of security consistent with the operational requirements of a lawfully established activity or resource consent."</u>	Support	Agree that public access may not be appropriate or desirable where it would (in addition to the matters set out) raise issues of security associated with the exercise of a lawfully established activity or resource consent requirement.
Fonterra Co-operative Group Limited	99	Policy 4.2.1 - Recognising heritage themes	Delete Policy 4.2.1.	Support	Agree that the Policy lacks any specific purpose or direction, and that the scope of the areas or features that potentially comprise "19th and early 20 th century pastoral sites" has the potential to unnecessarily adversely impact pastoral production.
Fonterra Co-operative	99	Policy 4.3.1 - Managing for	Amend Policy 4.3.1 clause a) to read: "a) Enabling <u>primary production farming</u>	Support	Provides for other compatible and beneficial

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Group Limited		rural activities	activities and other rural activities that support the rural economy; and}		activities in rural areas.
Peter Hore	66	Policy 4.3.2 - Managing land use in dry catchments	Amend Policy 4.3.2 as follows: "Managing land use change in dry catchments Manage land use change in dry catchments, to minimise any significant reduction in water yield, by: <u>(a) Supporting and encouraging pest control for pest species which may adversely affect water yield.</u> a) Restricting any extension of forestry activities within those catchments that would result in a significant reduction in water yield, including cumulative reductions; and b) Minimising the conversion of tussock grasslands to species which are less able to capture and hold precipitation."	Support	The control of pest species where these significantly impact catchment water yield will address the underlying objective of the policy.
Little Valley Station Ltd	148	Policy 4.3.2 - Managing land use in dry catchments	Remove clause 4.3.2 b).	Support	The linkage between tussock grasslands, greater water harvesting and better water quality requires further investigation before regulating for these in the RPS.
The Fertiliser Association of New Zealand Inc.	110	Policy 4.4.3 - Encouraging environmental enhancement	Amend as follows: "Policy 4.4.3 Encouraging environmental enhancement Encourage activities which contribute to enhancing the natural environment,	Support	The proposed addition provides necessary balance to the policy.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
			including to: ... <u>whilst providing for the social and economic wellbeing of the community."</u>		
Otago and Central South Island Fish and Game Councils	118	Policy 4.4.3 - Encouraging environmental enhancement	Amend as follows: "Encourage activities which contribute to enhancing the natural environment, including to: ... b) Protect or restore habitat for indigenous species, <u>including riparian habitats</u> ; or ... e) Restore the natural character of wetlands; or..."	Oppose	Many riparian habitats occur on private land, and while the importance of these are recognised by farmers they should retain the ability to decide what riparian margins are required and how these are maintained while meeting their environmental obligations (as required under the Regional Water Plan). The proposed policy to encourage restoration of wetlands is a significantly high bar. The original reference to natural character is an important qualifier.
Lynne Stewart	47	Policy suite 4.5 - Adverse effects of using and enjoying Otago's natural and built environment are minimised	<ul style="list-style-type: none"> Require controls on land use change to intensive farming, including dairy or dairy support, in sensitive catchments such as the Manuherikia Valley. Controls such as the fencing of riversides as well as riparian planting of a good (20 metres) width. 	Oppose	The concerns expressed by the submitter will be appropriately addressed under the Otago Regional Water Plan.
Horticulture New Zealand	124	Policy 4.5.1 - Avoiding objectionable discharges	Amend Policy 4.5.1 " <u>Objectionable adverse effects from discharges are avoided remedied or mitigated</u> Avoiding objectionable discharges. "	Support	Agree with the submitter's concerns that the policy should be consistent with the RMA and seek that adverse effects are avoided remedied or mitigated, and that the policy of

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
					"avoidance" is too absolute given there is no direction on what may be regarded as "objectionable".
Royalburn Farming Company Ltd, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown PTY Ltd, Damper Bay Estates Ltd, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Skifield Limited, Northlake Investments Limited, Shotover Country	102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138	Policy 4.5.7 - Enabling offsetting of indigenous biodiversity	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	Agree that Policy 4.5.8 requiring no net loss of biodiversity should provide sufficient protection and that offsetting should be considered when effects cannot be avoided remedied or mitigated.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Limited, Ayrburn Farm Developments Limited, Bridesdale Farm Developments Limited, Glencoe Station Limited, Treble Cone Investment Limited, Woodlot Properties Limited, Henley Downs Farm Holdings Limited, Real Journeys.					
Fonterra Co-operative Group Limited	99	Methods - general	Amend the PRPS to identify matters that are expected to be addressed through resource consent processes pending the preparation of regional and district plans.	Support	The PRPS leaves a significant number of matters "open-ended". Pending the completion of District Plan and Regional Plan processes, these matters will also need to be addressed by applicants and assessed by decision-makers.
Te Runanga	154	Method 1.4 -	Amend as follows:	Oppose	While we agree there should be some scope to

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga		Delegating functions to Kai Tahu	"1.4.1 Delegate and transfer <u>any one or more of its functions, powers or duties to the iwi authority under section 33 of the RMA plan administration functions to an iwi authority</u> , where this provides an efficient and effective service <u>or provides for greater involvement of Kai Tahu in the management of natural and physical resources. Any such transfer will be discussed and mutually agreed between the parties prior to any such transfer occurring.</u>		transfer some functions where this proves efficient or effective, the proposed amendments go significantly beyond what is intended or required and unnecessarily elevates Kai Tahu concerns.
Fonterra Co-operative Group Limited	99	Method 2.3 - Regional rule for extinguishing existing use rights	Delete Method 2.3, or alternatively, identify the criteria and thresholds that will be used to determine where the approach might be applied.	Support	The method could have significant effects on regionally significant activities and investment and should be deleted or amended to explain the criteria and thresholds that will determine where such an approach might be applied.
Royalburn Farming Company Ltd, Walter Peak Station, Millbrook Country Club, Eastburn Farm, RCL Queenstown	102, 103, 104, 105, 106, 107, 108, 109, 129, 130, 131, 132,	Method 2.3 - Regional rule for extinguishing existing use rights	Delete Method 2.3.	Support	Agree that the Method is currently ambiguous, and that deleting unnecessary provisions would provide clearer direction, strengthen the PRPS & result in efficiency gains.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
PTY Ltd, Damper Bay Estates Ltd, Halfway Bay Station, Water Tight Investments Ltd, Soho Basin Skifield Limited, Northlake Investments Limited, Shotover Country Limited, Ayrburn Farm Developmen ts Limited, Bridesdale Farm Developmen ts Limited, Glencoe Station Limited, Treble Cone Investment Limited, Woodlot	133, 134, 135, 136, 137, 138				

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Properties Limited, Henley Downs Farm Holdings Limited, Real Journeys.					
Fonterra Co-operative Group Limited	99	Method 3 - Regional Plans	<ul style="list-style-type: none"> Amend Method 3 to include the following: <u>"Regional plans will implement Policies [X & Y as set out in Fonterra's submission point 33 [point 38 in this summary document]] by:</u> <ul style="list-style-type: none"> <u>a) identifying appropriate provisions to enable the operation and development of regionally significant industry;</u> <u>b) maintaining and, where appropriate, enhancing access to natural and physical resources and recognising the benefits of regionally significant industry in the balancing of competing demands."</u> Amend Method 3 to include the following: <u>"To implement Policy 2.3.3, the Regional Plan will:</u> <ul style="list-style-type: none"> <u>a) identify freshwater management units;</u> <u>b) identify the use and non-use values of each unit;</u> <u>c) establish freshwater objectives to</u> 	Support	The sought after amendments would provide useful clarity, particularly in respect to implementation of the RPS.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
			<p><u>achieve identified values;</u></p> <p><u>d) set limits to allow the freshwater objectives to be met;</u></p> <p><u>e) manage land use activities and discharges of contaminants to meet limits;</u></p> <p><u>f) determine timeframes and appropriate methods for the improvement of degraded freshwater management units;</u></p> <p><u>g) implement a-f above through community and industry stakeholder involvement."</u></p>		
AgResearch Ltd	116	Method 3.1 - Developing regional plans	Delete Method 3.1.3	Support	If the Te Rununga o Ngai Tahu Hazardous Substances and New Organisms Policy Statement 2008 addresses these concerns we agree these matter do not need to be referenced in the Proposed RPS.
Central Otago District Council	37	Method 4.1 - Developing district plans	<p>Amend Method 4.1 as follows:</p> <ul style="list-style-type: none"> • City and district plans will <u>may</u> set objectives, policies and methods to implement policies in the RPS as they relate to the City or District Council areas of responsibility. • Delete Method 4.1.1 b) • Delete Method 4.1.2 • Delete Method 4.1.4 	Support	<p>Federated Farmers agrees with the submitter's concerns, particularly that:</p> <ul style="list-style-type: none"> • The method is too directive and compels territorial authorities to comply with all the policies in the RPS. This will have significant cost implications and may lead to inappropriate outcomes at a local level. • A requirement to manage land use in dry catchments where this will impact water yield is inappropriate and unnecessary given the quantity of

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
					tussock covered land in Central Otago.
Clutha District Council	28	Method 4.2 - Implementing district plans	Remove reference to Policy 2.2.5 from Method 4.2.2 if Policies 2.2.5 and 2.2.6 are deleted.	Support	Otago's TLAs should retain some discretion in these matters, to reflect the local context, concerns, issues and preferences.
Central Otago District Council	37	Method 4.2 - Implementing district plans	<ul style="list-style-type: none"> • Amend Method 4.2.1 as follows: "City or district councils will <u>may</u> implement Policies 3.2.2 and 3.2.3 when undertaking natural hazard assessments". • Amend Method 4.2.2 as follows: "City or district councils will <u>may</u> implement Policies 2.2.1, 2.2.3, 2.2.5 and 2.2.8 to assess the values of places of potential significance to inform the decision making process". • Delete Method 4.2.4. 	Support	Otago's TLAs should retain some discretion in these matters, to reflect the local context, concerns, issues and preferences.
Fonterra Co-operative Group Limited	99	Method 5 - Regional Policy Statement	Delete Method 5 and associated references in the PRPS.	Support	Agree with the submitter's concerns that the PRPS should be a self-contained document clearly referencing the policy direction for lower order plan preparation, and that it is not appropriate to rely on, to signal or to pre-empt the content of a future regional policy statement.
Waitaki Irrigators Collective Limited	113	Method 8.1.2 - Information from regional council - compulsory	Include a method that the Council will provide guidance on measures to maintain or enhance water quality, especially in relation to meeting limits.	Support	Agree that the Council should play a proactive role in supporting land users to meet water quality limits. This information should be made available.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
Waitaki Irrigators Collective Limited	113	Method 11.2.2 - Facilitation by regional council - compulsory	Include a method that promotes the facilitation of collaborative, community-led processes for the integrated management of land and water resources at the catchment scale.	Support	Agree that it would be desirable to include a wider range of stakeholders in water and land management processes at the catchment-scale at other times and in other circumstances.
Waitaki Irrigators Collective Limited	113	AER 2.2 - Otago's water bodies support healthy ecosystems, are safe for swimming, and maintain their natural form and character	Amend the indicator in relation to wetlands to include a significance threshold.	Support	Agree with the submitter's concerns that the inventory of all wetlands would be extremely time-consuming and expensive, and would also apply to constructed wetlands on private land.
Transpower New Zealand Limited	97	Glossary	Add new definition: " <u>National Grid: means the same as in the National Policy Statement on Electricity Transmission 2009, being the assets used or owned by Transpower New Zealand Limited.</u> "	Support	It is necessary to distinguish between the National Grid as defined in the NPSET and other electricity transmission infrastructure.
Fonterra Co-operative Group Limited	99	Glossary	Amend the Glossary to replicate the RMA definition of "contamination" and "contaminated land": <u>"Contaminated land</u> <u>Land that has a hazardous substance in or on it that—</u> <u>a) has significant adverse effects on the environment; or</u>	Support	It is necessary to define contaminated land for the purposes of the implementation of the RPS.

Submitter Name	Sub. No.	Section of plan	Summary of relevant part of Submission	Support/Oppose	Reason for submission
			<u>b) is reasonably likely to have significant adverse effects on the environment and "contaminant" has the meaning set out in the Resource Management Act 1991"</u>		
Fonterra Co-operative Group Limited	99	Glossary	<p>Include the following definition: "Primary production activities The commercial production of raw material and basic foods, which relies on the productive capacity of soil or water resources in the region. This includes the cultivation of land, animal husbandry/farming, horticulture, aquaculture, fishing, forestry, or viticulture. It does not include hobby farms, rural residential blocks, or land used for mineral extraction."</p>	Support	It is necessary to define primary production to better provide for the activity through the RPS.

CENTRAL OTAGO ENVIRONMENTAL SOCIETY INC.

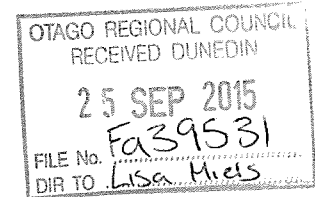
PO Box 10
Omakau 9377
Tel: 03 447 3744 e-mail: exemplar@scorch.co.nz

Further General Submission re the Proposed Otago Regional Policy Statement

Submitted by: DG Shattky

On behalf of: the Central Otago Environmental Society

We represent a relevant aspect of the public interest.



General

COES considers the RPS to be a once in a generation opportunity to formally **recognise** that the collective future of our communities is reliant on a healthy environment and the sustainable management of our remaining resources. It is therefore essential that the RPS should **establish** long term objectives to rehabilitate (where necessary), preserve and enhance Otago's environment.

Based on the best science available, the Policy Statement should also **set** resource management policy objectives to enable the maintenance of resilient, largely self-sustaining communities throughout the Region. Whilst **implementation** of those policies by District authorities will necessarily vary according to local conditions, the RPS should leave no room for obfuscation, procrastination or wilful blindness on the part of those authorities.

While the 156 responses to the draft proposal range across a broad spectrum of opinion, they also provide evidence of agreement on which a broad consensus might be built. COES will be supportive of a further process leading to the best possible Policy Statement. However, noting those few submissions which are critical or condemnatory of the proposed RFP to the point of requiring a change of approach or a complete re-write, the Society considers it necessary to make clear in this submission, where its support and opposition will lay.

Approach

- a. **Supports** the outcome oriented approach taken by the present draft.
 - b. **Opposes** proposals to rewrite the document on an issue by issue basis.
- (Note: in this context where well-being and perhaps survival is at stake, COES considers 'outcomes' to be ideal and ultimately achievable results; 'issues' are matters to be sorted and solved in order to achieve the desired outcome.)*

Objectives & Policies

- a. **Supports** the exposition of objectives and policies which look beyond current or short-term circumstances and situations, towards a time horizon of thirty or more years.

- b. **Supports** the ORC's 'integrated' approach and strongly advocates for the adoption of over-arching principles or values as a common reference point or measure, for use by both statutory bodies and the public.
- c. **Opposes** any proposal to dilute or change the draft wording regarding compliance with objectives and policies and specifically advocates for the continued use of the word 'avoid'.
- d. **Opposes** the inclusion of words or language in objectives and policies which is in any way ambiguous, leaves meaning or intent uncertain or detracts from the intent of the objective or policy.

Signed:

24 September 2015

Secretary

FURTHER SUBMISSIONS BY THE OIL COMPANIES: Z ENERGY LIMITED, MOBIL OIL NEW ZEALAND LIMITED AND BP OIL NEW ZEALAND LIMITED ON SUBMISSIONS TO THE PROPOSED OTAGO REGIONAL POLICY STATEMENT

To: Otago Regional Council
Private Bag 1954
DUNEDIN 9054

By E-Mail: rps@orc.govt.nz



Name of further submitter:

Z-Energy Ltd
PO Box 2091
WELLINGTON 6140

BP Oil NZ Ltd
PO Box 99 873
AUCKLAND 1149

Mobil Oil NZ Ltd
PO Box 1709
AUCKLAND 1140

Hereafter referred to as the "Oil Companies".

1. The Oil Companies' further submissions are as contained in the attached Table.
2. The Oil Companies' interest in the proposed plan is greater than the interest of the general public.
3. The Oil Companies do wish to be heard in support of their further submissions.
4. If others make similar submissions the Oil Companies may be prepared to consider presenting a joint case with them at any hearing.

Dated at AUCKLAND this 25th day of September 2015

Signature on behalf of the Oil Companies:

Mark Laurensen
Authorised to Sign on Behalf of the Oil Companies

Address for service:

BURTON PLANNING CONSULTANTS LIMITED

Level 1, 2-8 Northcroft Street

PO Box 33-817

Takapuna

AUCKLAND 0740

Attention: Mark Laurenson

Ph: (09) 917 4302

Fax: (09) 917 4311

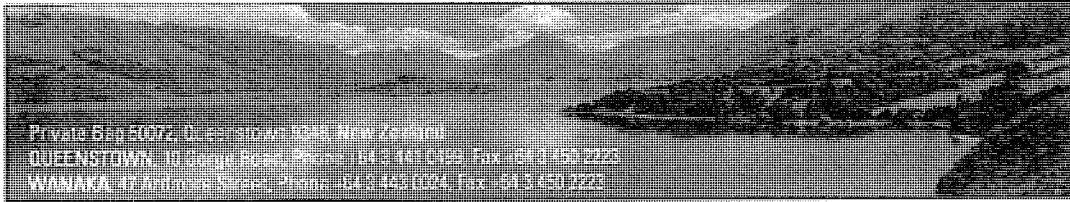
Email: m Laurenson@burtonconsultants.co.nz

**FURTHER SUBMISSIONS ON BEHALF OF THE OIL COMPANIES
ON SUBMISSIONS TO THE PROPOSED OTAGO REGIONAL POLICY STATEMENT**

Submission	Relief Sought By Submitter	Position of Further Submitter	Reason For Support / Opposition
Fonterra Co-operative Group Ltd (99) Ref 178	Amend the PRPS to identify matters that are expected to be addressed through resource consent processes pending the preparation of regional and district plans	Support	A number of provisions require potentially onerous assessments by applicants, for instance requirements to assess natural hazard consequence (Policy 3.2.3). The Oil Companies support the clarity that would be provided by better establishing responsibility for a number of these requirements, particularly in the absence of regional and district plans prepared in accordance with the PRPS.
Fonterra Co-operative Group Ltd (99) Ref 34	Amend Policy 2.1.4 (Managing for air quality values) clause a) to read: "Maintain good ambient air quality that <u>avoids unacceptable risks to</u> supports human health, or enhance air quality where it has degraded to a level that is adversely affecting human health; and". 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.	Support	The Oil Companies support the improved clarity of these provisions which remove a number of ambiguous terms which are not defined in the PRPS.
Fonterra Co-operative Group Ltd (99) Ref 249	• Include a definition of "contaminated land" in the PRPS, adopting the same definition as set out in Section 2 of the RMA:	Support	Adoption of the RMA definition is appropriate and will provide clarity re when the contaminated land provisions apply.
Fonterra Co-operative Group Ltd (99) Ref 188	Delete Method 2.3 (regional rule for extinguishing existing use rights), or alternatively, identify the criteria and thresholds that will be used to determine where the approach might be applied.	Support	The method is not linked to plan provisions or justified in the section 32 report and should be deleted.
Otago Civil Defence Emergency Management Group (100) Ref 131	Policy 3.9.2 (hazardous substances and waste) - Amend policy to include the management of the transportation of hazardous substances.	Oppose	The proposed amendment may lead to Councils imposing consent conditions on hazardous facilities seeking to control hazardous substances outside the site of a hazardous facility and in relation to transport routes. Such an approach would be problematic for the Oil Companies, who employ independent haulage companies to

**FURTHER SUBMISSIONS ON BEHALF OF THE OIL COMPANIES
ON SUBMISSIONS TO THE PROPOSED OTAGO REGIONAL POLICY STATEMENT**

Submission	Relief Sought By Submitter	Position of Further Submitter	Reason For Support / Opposition
			transport hazardous substances, and is unnecessary given such activities are already controlled by way of HSNO and the Land Transport Act.
Otago Civil Defence Emergency Management Group (100) Ref 177	Roles and responsibilities - Amend to clarify that the "transport/transportation" of hazardous waste and waste materials includes the transfer of such substances	Oppose	The proposed amendment may lead to Councils imposing consent conditions on hazardous facilities seeking to control hazardous substances outside the site of a hazardous facility and in relation to transport routes. Such an approach would be problematic for the Oil Companies, who employ independent haulage companies to transport hazardous substances, and is unnecessary given such activities are already controlled by way of HSNO and the Land Transport Act.
Walter Peak Station (103) Ref 6	Delete schedule 3 (significance thresholds)	Support	The inclusion of Schedule 3 is not justified in the S32 report and no guidance is provided as to when this threshold should be applied.
Oceana Gold (NZ) Ltd (140) Ref 3	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	It is recognised that the use of "avoid" may be appropriate in some cases but case law has shown that to avoid unintended consequences it should only be used where the intent is to prevent a particular activity, especially when used in an RPS level document.
Dunedin City Council (156) Ref 189	Amend [Method 3.1.4(g)] to clarify that the Regional Council's role in contaminated land management is for any on-going discharges from those sites.	Support	This accords with the requirements of the RMA under Section 30.
Dunedin City Council (156) Ref 193	Include a new method under City and District plans to describe that those Councils will address adverse effects from the subdivision, development or use of contaminated land, and give effect to the NES for Assessing and Managing Contaminants in Soil to Protect Human Health.	Support	This accords with the requirements of the RMA under Section 31 and the NES.



Private Bag 50072, Queenstown 9344, New Zealand
QUEENSTOWN: 11 George Street, Phone: 03 533 6199 Fax: 03 533 6226
WANAKA: 11 Ardmore Street, Phone: 03 533 6004 Fax: 03 533 6226

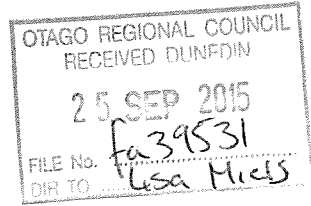


www.qldc.govt.nz

1015

24 September 2015

Dale Meredith
Manager Policy
Otago Regional Council
Private Bag 1954
DUNEDIN 9054



Dear Dale

FURTHER SUBMISSION ON PROPOSED OTAGO REGIONAL POLICY STATEMENT

The Queenstown Lakes District Council (QLDC) wishes to provide a further submission on the Proposed Regional Policy Statement (RPS) for Otago, as outlined below.

We also note QLDC's submission points on Method 4.1.12 and the definition of 'Urban Growth Boundary' contained within the Glossary have not been reflected within the ORC's 'Summary of Decisions Requested' document. Accordingly, a copy of our original submission dated 24 July 2015 is also attached for reference.

Thank you for considering this feedback and continuing to involve us in the development of the Proposed RPS.

Yours sincerely

Vanessa van Uden
Vanessa van Uden
MAYOR



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)

Office use only

Name of further submitter:

QUEENSTOWN LAKES DISTRICT COUNCIL

Organisation (if applicable):

Postal address:

PRIVATE BAG 50072
 QUEENSTOWN 9348

Postcode:

9348

Telephone:

03 450 6335

Email:

matthew.pactz@q/dc.govt.nz

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:

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

Further submission points

Provision	Submitter further submission relates to	Submitter No.	What part of the submission your further submission relates to and if you support or oppose it	Reasons
Policy suite 3.7	Remarkables Park Limited and Queenstown Park Limited	147	Oppose the request to: <i>"amend Objective 3.7 and associated policies to ensure that they are focused on the functions of a regional council and do not impose detailed policy statements that are better managed at the district council level"</i> .	<p>The functions of a regional council include integrated management of natural and physical resources (as per Section 59 Purpose of Regional Policy Statements; and Section 30 Functions of regional council) and extend to the integrated management of the urban environment.</p> <p>The inclusion of Objective 3.7 (and supporting policies, including Schedule 6) is consistent with the function of a Regional Policy Statement, and aligns well with the QLDC Proposed District Plan.</p> <p>Notwithstanding the content of our submissions relating to specific aspects of urban development (including Natural Hazards) we support the inclusion of Objective 3.7 and supporting Policies within the RPS. Their current format and content is not prescriptive, and provides sufficient scope for more detailed policy and rules to be developed at District level.</p>
Policy 3.7.1 Schedule 6	Royalburn Farming Company Ltd Walter Peak Station Millbrook Country Club Eastburn Farm RCL Queenstown PTY Ltd Damper Bay Estates Ltd Halfway Bay Station Water Tight Investments Ltd Soho Basin Skifield Limited Northlake Investments Limited Shotover Country Limited	102 103 104 105 106 107 108 109 129 130 131	<p>Oppose the proposed amendment to Policy 3.7.1.</p> <p>Oppose the proposed deletion of Schedule 6.</p>	<p>Notwithstanding the content of our submissions relating to specific aspects of urban development (including Natural Hazards) we support the inclusion of Policy 3.7.1 and Schedule 6 (Urban Form and Design) within the RPS. The current format and content is not prescriptive, and provides sufficient scope for more detailed policy and rules to be developed at District level. The current format also effectively provides for integrated management of urban design outcomes at District and Regional levels.</p>

	Ayrburn Farm Developments Limited	132		
	Bridesdale Farm Developments Limited	133		
	Glencoe Station Limited	134		
	Treble Cone Investment Limited	135		
	Woodlot Properties Limited	136		
	Henley Downs Farm Holdings Limited	137		
	Real Journeys	138		
3.8.1(b)	Darby Planning LP	81	Oppose (in part) the proposed amendment to Policy 3.8.1(b).	<p>The amendment proposed by this submission is opposed. Policy 3.8.1(b)(i) and 3.8.1(b)(ii) captures integrated land use and infrastructure planning objectives, and supports the QLDC Proposed District Plan through discouraging urban sprawl which can result in costly infrastructure upgrades.</p> <p>It is not practical to state (as proposed by the submitter) that the avoidance of communities bearing additional costs of infrastructure can be achieved. This issue is best dealt with by Development Contributions, Ratings and Financial Contributions Policies – in the event of “unplanned” urban development.</p>
Policy 3.8.1	Royalburn Farming Company Ltd	102	Oppose (in part) proposed amendment to Policy 3.8.1 to include the word “providing”.	<p>The amendment proposed by submitters through use of the word “providing” shifts the focus from “managing” urban growth, to providing for, and meeting demand for urban land in all cases. The proposed amendment does not appropriately balance all resource management issues related to urban growth. Whilst there are demonstrated land supply and affordability issues in the Queenstown Lakes District, there are a range of other resource management issues to be considered in setting urban limits. Accordingly, QLDC Opposes the proposed amendment to Policy 3.8.1 to include the word “providing”.</p>
	Walter Peak Station	103		
	Millbrook Country Club	104		
	Eastburn Farm	105		
	RCL Queenstown PTY Ltd	106		
	Damper Bay Estates Ltd	107		
	Halfway Bay Station	108		
	Water Tight Investments Ltd	109	Support proposed amendment to Policy	As noted in QLDC's original submission, the function of Urban Growth

	Soho Basin Skifield Limited	129	3.8.1 to remove reference to 10 years.	Boundaries in the Queenstown Lakes District is not only related to land supply/demand, but also protecting significant landscapes, and the cohesion and heritage/character of urban centres. For this reason, they will not in all cases necessarily cater for 10 years of growth. Reference to providing 10 years of growth is problematic, and may result in the perception that increased density is not necessary because sufficient supply exists for a 10 year period. Accordingly, QLDC supports the proposed amendment to Policy 3.8.1 to remove reference to 10 years. As noted in QLDC's original submission, avoidance of significant hazard risk is supported in greenfield areas. However within existing urban centres the complete "avoidance" of natural hazard risk may not be appropriate or achievable. The social and economic consequences of "avoidance" strategies are significant on local, regional and national levels. Similar to the submitters proposed amendment to Policy 3.8.1, QLDC seeks an alternative approach that recognises within urban limits there may be natural hazard risks and these need to be appropriately managed and mitigated to tolerable levels. Accordingly, QLDC supports an amendment to Policy 3.8.1 relating to natural hazards.
	Northlake Investments Limited	130		
	Shotover Country Limited	131		
	Ayrburn Farm Developments Limited	132		
	Bridesdale Farm Developments Limited	133	Support proposed amendment to Policy 3.8.1 relating to natural hazards.	
	Glencoe Station Limited	134		
	Treble Cone Investment Limited	135		
	Woodlot Properties Limited	136		
	Henley Downs Farm Holdings Limited	137		
	Real Journeys	138		
Policy 3.8.1	Queenstown Airport Corporation	122	Oppose proposed insertion to policy 3.8.1.	The amendment suggested by the submitter is inherently wide in scope in application, and does not specify physical limits within which reverse sensitivity effects are to be managed.
Policy 3.8.2	Darby Planning LP	81	Oppose the complete deletion of Policy 3.8.2 (<i>Controlling growth where there are identified urban growth boundaries or future urban development areas</i>) Support the deletion of Schedule 8 Support the deletion of	It is appropriate for the RPS to contain policy relating to urban growth boundaries for the purpose of achieving integrated land use management and infrastructure provision. The framework of the RPS policy supports this, whilst enabling location specific provisions to be developed at the District level to manage the location of urban growth boundaries, in addition to consideration of local economic benefits and consequences when forming these boundaries. For these reasons, we oppose the complete deletion of Policy 3.8.2 put forward by these submitters. However, as noted in our original submission, QLDC supports the deletion of Schedule 8 from the RPS, as the determination and mapping of Urban Growth boundaries is more appropriately managed at District level. Additionally, QLDC supports the deletion
	Royalburn Farming Company Ltd	102		
	Walter Peak Station	103		
	Millbrook Country Club	104		
	Eastburn Farm	105		
	RCL	106		
	Queenstown PTY Ltd			
	Damper Bay Estates Ltd	107		
	Halfway Bay Station	108		
	Water Tight Investments Ltd	109		
	Soho Basin Skifield	129		

	Limited Northlake Investments Limited	130	Policy 3.8.2 (a)	of Policy 3.8.2 (a) relating to the staging of development, as staging and sequencing of land release may have unintended economic consequences.
	Shotover Country Limited	131		
	Ayrburn Farm Developments Limited	132		
	Bridesdale Farm Developments Limited	133		
	Glencoe Station Limited	134		
	Treble Cone Investment Limited	135		
	Woodlot Properties Limited	136		
	Henley Downs Farm Holdings Limited	137		
	Real Journeys	138		
Policy 3.8.3	Royalburn Farming Company Ltd	102		
	Walter Peak Station	103		
	Millbrook Country Club	104		
	Eastburn Farm	105		
	RCL	106		
	Queenstown PTY Ltd	107		
	Damper Bay Estates Ltd	108		
	Halfway Bay Station	109		
	Water Tight Investments Ltd	129		
	Soho Basin Skifield Limited	130		
	Shotover Country Limited	131		

	Ayrburn Farm Developments Limited	132		
	Bridesdale Farm Developments Limited	133		
	Glencoe Station Limited	134		
	Treble Cone Investment Limited	135		
	Woodlot Properties Limited	136		
	Henley Downs Farm Holdings Limited	137		
	Real Journeys	138		
Method 4.1.12	Royalburn Farming Company Ltd	102	Oppose the deletion of Method 4.1.12.	The functions of a regional council include integrated management of natural and physical resources (as per Section 59 <i>Purpose of Regional Policy Statements</i> ; and Section 30 <i>Functions of regional council</i>) and extend to the integrated management of the urban environment. Establishing the framework for urban growth boundaries is consistent with the function of a Regional Policy Statement, and aligns well with the QLDC Proposed District Plan. The inclusion of Method 4.1.12 integrates with Objective 3.7 and Policy 3.8.2. Accordingly, QLDC opposes the deletion of Method 4.1.12.
	Walter Peak Station	103		
	Millbrook Country Club	104		
	Eastburn Farm	105		
	RCL	106		
	Queenstown PTY Ltd	107		
	Damper Bay Estates Ltd	108		
	Halfway Bay Station	109		
	Water Tight Investments Ltd	129		
	Soho Basin Skifield Limited	130		
	Northlake Investments Limited	131		
	Shotover Country Limited	132		
Ayrburn Farm Developments Limited	133	Support the deletion of Method 4.1.12(b) – as outlined in our original submission.	Notwithstanding, we wish to highlight QLDC's original submission on Method 4.1.12 which has not been effectively captured within ORC's Summary of Submissions. The function of UGB's in the Queenstown Lakes District is not only related to land supply, but also protecting significant landscapes, and the cohesion and heritage/character of urban centres. For this reason, they will not in all cases necessarily cater for 10 years of growth. Additionally, growth rates are affected by a range of external influences and this may necessitate a review of urban growth boundaries over time. Accordingly, QLDC supports the amendment or deletion of Method 4.1.12(b) which refers to urban growth boundaries accommodating 10 years of urban growth needs.	

	Limited Glencoe Station Limited	134		QLDC also supports the submitters comments that the mapping of urban growth boundaries should not be included within the RPS (refer further submission point on Policy 3.8.2 and Schedule 8 above) as urban growth boundaries may be reviewed over time and this is best dealt with at a local level. We therefore request that the wording of Method 4.1.12 retains sufficient discretion for District Councils through maintaining use of the word 'may': " <i>City or district plans may implement Policy 3.8.2 by:...</i> ".
	Treble Cone Investment Limited	135		
	Woodlot Properties Limited	136		
	Henley Downs Farm Holdings Limited	137		
	Real Journeys	138		
Method 4.1.4	Central Otago District Council	37	Conditionally support the request to delete method 4.1.4	QLDC supports the concept in principle but seeks that the ORC provide clarity on expectations in terms of what provisions would be expected in the QLDC District Plan.
	Waitaki District Council	70	Support the request to define the dry catchment and amend the method so it is a requirement of a regional plan.	The QLDC District Plan already provides for potential land use change in dry catchment through provisions for indigenous vegetation, forestry and wilding exotic trees. However, these provisions are related to policies primarily associated with managing indigenous biodiversity, landscape, and wilding exotic tree spread, and are not primarily intended to manage land use change in dry catchments.
Method 3.1	Central Otago District Council	37	Support the submission in that the method does not acknowledge the statutory function of the ORC to control the use of land for soil conservation.	The ORC relies on territorial authorities through the earthworks provisions in their district plans. However the district plans take a focus on managing the potential adverse effects of earthworks in the context of amenity, ground stability, and construction/disturbance related environmental protection measures. These are not related to soil conservation in terms of s30(1)(c)(1) of the RMA.

24 July 2015

Dale Meredith
Manager Policy
Otago Regional Council
Private Bag 1954
DUNEDIN 9054

OFFICE OF THE MAYOR

Dear Dale

FEEDBACK ON PROPOSED OTAGO REGIONAL POLICY STATEMENT

Thank you for continuing to involve QLDC in the development of the ORC's Proposed Regional Policy Statement (RPS). We note that the feedback we have provided to date has been considered and has been reflected in some changes in the latest version.

We firstly wish to commend the ORC in developing a new generation RPS which addresses current planning issues in a clear and concise manner, and will support the ongoing integration of local and regional decision making. The approach of the RPS in relation to the managing urban growth is generally consistent with QLDC's direction, and the principles for urban growth and design align well with the QLDC Proposed District Plan (to be notified in August 2015). In particular, Policies 3.7.2 and 3.7.3 provide the framework for sustainable building forms which are encouraged via the High Density and Medium Density Residential provisions of the Proposed District Plan.

We also wish to highlight support for the encouragement of small scale renewable energy generation in minimising reliance on fossil fuels and improving the resilience of local energy supplies. This is also an element which QLDC is seeking to encourage via a more enabling regulatory framework.

Additionally, provisions relating to pest management provide the basis for more effective control of wilding pines, an issue particularly significant for this District. We support policies 2.2.4, 2.2.6(e) and 2.2.13(d), and look forward to working with ORC in developing the Pest Management Strategy and specific actions and priorities going forward.

As discussed over the phone on the 17 July 2015, QLDC has some remaining concerns and questions relating to the following key matters within the Proposed RPS:

- Natural hazards
- Climate change
- Urban growth
- Scenic Amenity Landscapes
- Roles and responsibilities

Queenstown Lakes District, given that existing development may be within areas considered to be of 'significant risk'. These include:

- Inability to meet housing and accommodation demands to address significant growth pressures
- Increased overcrowding and social health concerns due to lack of new housing
- Compromised urban growth boundaries and need for new settlements at increasing distances from urban centres, with associated environmental, social and financial implications
- Viability of town centres and public transport routes compromised by lack of density
- Economic and tourism decline, associated with all of the above.

We also note that it is not possible to fully appreciate the costs and benefits of avoidance strategies without an understanding of what 'significant' risk is, or where these areas may be.

We understand based on our discussion with ORC on 17 July, that the policy approach of the Proposed RPS was intended to enable local councils to use their discretion in determining appropriate methods of managing natural hazard risks. We also understand that reference to "significant risk" was a result of questions around the robustness of previous policies which otherwise referred to "intolerable" risk.

To enable QLDC sufficient discretion to manage natural hazard risks, we seek an alternative approach that recognises within urban limits there may be natural hazard risks and these need to be appropriately managed and mitigated. It is appreciated that the methods of managing risk will be dependent upon the tolerance of the community, the willingness to accept risk, and how limited the land resource is at any given point in time.

Accordingly, we suggest that the scope of Policies 3.2.6 and 3.1.7 is widened to enable consideration of the extent to which risk can be mitigated or reduced to tolerable levels. This is consistent with a risk based planning approach reflected by the current research of GNS, and AS/NZS ISO 31000:2009 (as referenced in ORC's s32 analysis).

Relating to the aim of risk reduction, it is considered that the intent of policy 3.2.6 and 3.7.1(c) would be maintained by amending these policies to include reference to "*avoiding or reducing natural hazard risk*", and the encouragement of design that facilitates an acceptable reduction in natural hazard risk. These amendments retain the overall goal of risk reduction, whilst enabling flexibility to allow for site specific analysis.

Tolerance

The Proposed RPS also refers to the concept of community "tolerance" to natural hazards (Policy 3.2.4, 3.2.7 & AER 3.1). The concept of tolerance is not discussed or defined. AER 3.1 states that: *Otago's communities have defined their tolerance of risks from natural hazards and climate change* and that this risk tolerance is reflected in planning documents.

We interpret the intent of Policy 3.2.4 and 3.2.7 as being sufficiently wide in scope such that tolerance should be considered as just one of a number of items to be had "regard to" when considering methods to reduce and manage hazards. We also understand that ORC sought not to define this term. However, we seek further clarification on the meaning of this concept moving forward, and the intended roles and responsibilities of District and Regional Councils in addressing this.

Furthermore, the function of UGB's in the Queenstown Lakes District is not only related to land supply, but also protecting the cohesion and heritage/character of urban centres. For this reason, they will not in all cases necessarily cater for 10 years of growth. Reference to providing 10 years of growth is problematic, and may result in the perception that increased density is not necessary because sufficient supply exists for a 10 year period.

Therefore, we would prefer that the definition and function of urban growth boundaries within the Proposed RPS does not refer to staging or sequencing, or specify a time period of growth.

We also anticipate that urban growth boundaries would be reviewed and potentially amended over time. For this reason, we request that the RPS provide the framework for the use of UGB's as a tool, but that the mapping of UGB's is limited to the District Plan, and not replicated within the RPS. We understand discretion is enabled on this matter by Method 5.1.

Special Amenity Landscapes

Based on our discussion of 17 July, it is understood that the term 'Special Amenity Landscapes' has been determined to apply generally across the region, and that District councils have the ability to determine specific titles more appropriate for specific locations/areas.

However, we seek to question Method 6.1.2(d) which states:

*"Regional, city and district councils, in their areas of responsibility, will identify...
d) Special amenity landscapes".*

It is suggested that the identification of Special Amenity Landscapes be at the discretion of the territorial authority, where necessary to give effect to Section 7(c) of the RMA. It is therefore requested that this method state 'may' rather than 'will'.

Additionally, we seek clarification as to whether this term would be intended to also apply to urban environments or heritage sites with particular amenity values, and if so, whether this is suitably addressed by the policy framework.

Roles and responsibilities **Method 6.3.1, Method 6.4.1**

Method 6.3.1 states that District Councils *will* undertake State of the Environment Reporting. The current role of QLDC with regard to the management and monitoring of the environment is governed by the roles and responsibilities under the *Local Government Act 2002* and *Resource Management Act 1991*. Whilst we recognise the value of such a task, we note that this is not a specific requirement of these Acts. Section 35 of the RMA states that:

*"Every local authority shall monitor—
(a) the state of the whole or any part of the environment of its region or district—
(i) to the extent that is appropriate to enable the local authority to effectively carry out its functions under this Act; and..."*

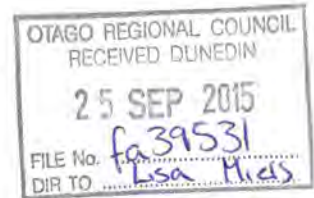
Section 35 enables a local authority to undertake State of the Environment reporting where appropriate or necessary; however this responsibility is not mandatory. As such, it is considered that the Councils role with regard to environmental monitoring is best delivered by the existing responsibilities under these Acts.

Attachment A – General comments

Reference	Comment	Action sought
Heritage		
Method 4.1.9(a)	Promoting the use of accidental discovery protocols (for archaeology) should not be a substitute for correctly assessing the effects of development on historic heritage. Additionally, this method statement is currently linked to Policy 4.3.2 (<i>Managing land use change in dry catchments</i>) – however is likely to be relevant to other policies more specifically related to heritage.	Consider inclusion policies and methods to guide historic heritage assessments, and linkage of Method 4.1.9 to other policies more specifically related to heritage.
General	The document does not make it clear on who is responsible for identifying historic heritage. This covers a wide range including cultural sites, archaeology, landscapes as well as built heritage and precincts.	Clarify intended roles and responsibilities for historic heritage.
General	The items identifying historic heritage are specific to built features and there does not appear to be a reference/policy that recognises vegetation within urban environments and exotic vegetation such as protected trees.	Recommend inclusion of vegetation within the scope of policies relating to historic heritage.
Energy		
Intro to Chapter 3 (page 43) Objective 3.6	Support for local energy production and conservation will also reduce reliance on fossil fuels and improve resilience.	Consider greater emphasis on the importance of local energy production
Climate change		
Objective 3.3	Objective does not recognise the increasing frequency of extreme events associated with climate change.	Consider including recognition that extreme weather events are becoming more common, increasing demands on infrastructure networks.
Urban Growth		
Policy 3.8.1(f) (Low or no emission heating systems)	Policy 3.8.1 proposes to require the use of low- or no-emission heating in new urban areas, in areas with degraded air quality, or at risk of degradation. However, the RPS does not provide detail of the specific locations to be managed, or 'air pollution sensitive areas'.	Suggest inclusion of specific locations subject to management control, or linkage to relevant external documents.
Policy 3.8.3 (a) – Managing fragmentation of rural land <i>"Avoid development or</i>	Primary production is undefined. If avoidance strategies are sought then further definition of the activities encompassed by primary production should be provided (eg. does this term extend to the wine industry?). An activity may affect the potential use of land for productive use, but this productive use may not	Define 'primary production'. Consider appropriateness of avoidance in all economic circumstances.

		streamlined document.
Public Transport		
Policy 3.6.6	It is also important to highlight that public transport networks and facilities (eg bus shelters) should be considered during the planning stages of development as an integral component of the transport system. Retrofitting systems into developed urban areas can be challenging and often more costly.	Recommend that policy addresses the need to consider public transport requirements during site design and transport planning phases.
Economic production		
Policy 4.3.4	The term "central business district" does not appropriately reflect the nature of urban centres within the Queenstown Lakes District.	Recommend that this Policy also includes reference to 'Town Centres' to ensure appropriate application in the Queenstown Lakes District.
Environmental enhancement		
Policy 4.4.3	This policy could also encourage activities which contribute to (or minimise effects on) the recharging of ground water, potable water tables and aquifers.	Consider inclusion of water quantity and quality as an additional matter of consideration within this policy.
Mineral Gas Exploration		
Policy 4.5.6	It is appreciated that this policy is intended to be general in nature and does not contain provisions specific to any type of mineral activity. However it is questioned whether the policy has sufficient strength to consider the potential effects of fracking, specifically with regard to impacts on water quality and quantity; potential increased earthquake risk; and soil/water contamination. Additionally, subsequent policies do not consider potential requirement for offsetting due to impacts to water.	Request inclusion of policy to address the potential known or feasible risks of mineral exploration, particularly fracking; and scope for offsetting for significant water quality/quantity effects.
Urban form and design		
Schedule 6	Request more specific recognition of: <ul style="list-style-type: none"> • 2 (h) – connections with blue networks, as reflected by Objective 3.7 • 3(h) - cycling connectivity • 4(b) - stronger emphasis on heritage to consider adverse effects but also the positive effects of proposals which can enhance the value or useability of a heritage feature. 	Request inclusion of the matters identified.

1016



25 September 2015

Director Policy and Resource Planning
Freepost 497
Proposed RPS
Otago Regional Council
Private Bag 1954
DUNEDIN 9054

Attention: Fraser McRae

Dear Fraser

FURTHER SUBMISSION ON PROPOSED REGIONAL POLICY STATEMENT 2015

Please find attached Further Submissions on behalf of Aurora Energy Limited in respect of the Proposed Regional Policy Statement 2015.

If you require any further information or clarification on the submission do not hesitate to contact me either by phone on (03) 471 6783 or email joanne.dowd@thinkdelta.co.nz.

Yours sincerely

Joanne Dowd
Network Policy Manager

Encl

SUBMISSION FORM 6

CLAUSE 8 OF FIRST SCHEDULE, RESOURCE MANAGEMENT ACT 1991

FURTHER SUBMISSION IN SUPPORT OF OR IN OPPOSITION TO SUBMISSIONS ON PUBLICLY NOTIFIED PROPOSED OTAGO REGIONAL POLICY STATEMENT 2015

To: Otago Regional Council
Private Bag 1954
DUNEDIN

Submission on: Submissions on the Proposed Otago Regional
Policy Statement 2015

Name: Aurora Energy Limited
Address: PO Box 1404,
DUNEDIN 9054

1. These further submissions are in support of or in opposition to submissions on the Proposed Otago regional Policy Statement (“**PRPS**”) 2015.
2. Aurora Energy Limited (“**Aurora**”) is a person who has an interest in the Plan Change that is greater than the interest of the general public.
3. As explained in Aurora’s original submission, Aurora owns, operates and maintains an electricity distribution network in the Dunedin and Central Otago regions. This network carries electricity from the National Grid to more than 85,000 homes and businesses across Dunedin City and the Central Otago Region. Aurora owns substations, lines and cables located in public road reserve, as well as on private property. In addition to the distribution network, Aurora has the capacity to own and operate high voltage (up to 110kV) transmission lines, and associated structures in future, and may be required to do so as regional electricity demand grows. Aurora is committed to providing its customers in the region with an effective and secure supply of electricity, which in doing so provides a critical service to customers as well as a public good to local communities including hospitals, schools, offices and residential dwellings.
4. Aurora has particular interests in ensuring that the PRPS enables the continued and efficient operation of its regionally significant infrastructure as well as generally ensuring that other existing and new regionally significant infrastructure within the Otago region is adequately provided for.

5. In light of the above, Aurora considers that it has an interest in the PRPS that is greater than the interest of the general public, by virtue of its existing Regionally Significant and Critical Infrastructure throughout the Otago Region.
6. Aurora therefore makes the following further submissions pursuant to clause 8 of the First Schedule to the RMA. Further submissions from Aurora on the PRPS are attached to this document in Table Form. (See **Annexure One**).
7. Aurora will not gain an advantage in trade competition through these further submissions.

Aurora wishes to be heard in support of its submission.

If others make a similar submission, Aurora will consider presenting a joint case with them at a hearing.

Signed:.....

On behalf of Aurora Energy Limited
Dated at Dunedin this 25th day of September 2015

Address for Service:
Aurora Energy Limited
C/- Delta Utility Services Limited
PO Box 1404
DUNEDIN 9054

Contact Details:
Attention: Joanne Dowd – Network Policy Manager
Telephone: 03 471 6783
E-mail: joanne.dowd@thinkdelta.co.nz

Submitter	Decision Requested	Aurora's Position	Further Submission
Whole Regional Policy Statement (General Support)			
Radio New Zealand Limited (57)	Submitter supports the RPS, with some suggested amendments, as it provides appropriate guidance on: <ul style="list-style-type: none"> The critical contribution of infrastructure and network utility operations to social, economic and cultural wellbeing and to health and safety; The technical and operational constraints of RNZ's facilities; The need to avoid "reverse sensitivity" effects on regionally significant network utilities. 	Support	Aurora agrees that it is important that the PRPS provides appropriate guidance on the critical contribution of infrastructure and network utility operations to social, economic and cultural wellbeing and to health and safety. It is also appropriate that the PRSP recognises and provides guidance on the need to address issues associated with reverse sensitivity effects on regionally significant infrastructure. This submission is aligned with the relief sought by Aurora in its original submissions.
Oceana Gold (New Zealand) Ltd. (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	Aurora agrees that there will be circumstances where adverse effects may be unavoidable for some activities such as regionally significant infrastructure. It is therefore appropriate that the PRPS promotes the ability to avoid, remedy, mitigate and compensate. This submission is aligned with the relief sought by Aurora in its original submissions.
Chapter B2 - General Requests			
Fonterra Co-operative Group Ltd. (99)	Include a new Objective: <u>"Objective [X] Otago's special amenity landscapes and highly valued natural features are identified and protected from inappropriate development"</u> <u>Otago has a number of special amenity landscapes or natural features which are highly valued but which are not outstanding for the purposes of section 6 of the Resource Management Act 1991. Often, enabling development in these areas will be appropriate provided significant adverse effects can be appropriately avoided, remedied or mitigated."</u>	Support	Aurora supports this submission in so far as the current approach promoted within the PRPS 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, such as <i>Special Amenity Landscapes</i> . Aurora agrees that in many cases development can occur in the <i>Special Amenity Landscapes</i> without resulting in significant adverse effects. This submission is aligned with the relief sought by Aurora in its original submissions.
Policy suite 2.1 - The values of natural resources are recognised, maintained or enhanced			
Airways Corporation of New Zealand Limited (43)	Submitter seeks additional policies that adequately recognise the built environment as a physical resource to support Objective 2.1.	Support	Aurora agrees that the majority of the policies in this section of the PRPS focus largely on natural resources. Aurora's regionally significant infrastructure assets form part of the built environment and are physical resources with a very important value in terms of the function they perform for the economic, social and cultural wellbeing of the community.
Ministry of Education (79)	Add policies to ensure the importance of the built environment as a physical resource is recognised.	Support	Aurora agrees that the majority of the policies in this section of the PRPS focus largely on natural resources. Aurora's regionally significant infrastructure assets form part of the built environment and are physical resources with a very important value in terms of the function they perform for the economic, social and cultural wellbeing of the community.
Policy 2.1.1 - Managing for freshwater values			
Transpower New Zealand Limited (97)	Amend p) as follows: " p) maintain the ability <u>Enable the reasonable operational, maintenance and minor upgrade requirements</u> of existing infrastructure to operate within their design parameters."	Support	Aurora supports the amendments outlined by the submitter in so far as it seeks to ensure that regionally significant infrastructure can be operated, maintained and upgraded.

Submitter	Decision Requested	Aurora's Position	Further Submission
			<p>However, Aurora considers the clause also needs to apply to <i>Essential Structures</i> as outlined in Aurora's original submission.</p> <p>Policy 2.1.1 clause 'P' should be amended as follows:</p> <p>: "p) maintain the ability <u>Enable the reasonable operational, maintenance and minor upgrade requirements</u> of existing infrastructure <u>and essential structures</u> to operate within their design parameters."</p>
Policy 2.1.2 - Managing for the values of beds of rivers and lakes, wetlands, and their margins			
KiwiRail Holdings Limited (69)	<p>Amend Policy as follows:</p> <p>...</p> <p>" <u>m) Maintain the ability of existing infrastructure to operate within their design parameters.</u> "</p>	Support in part	<p>Aurora agrees that recognition should be provided for infrastructure that is located in the beds of rivers and lakes, wetlands and their margins. However, Aurora submits that the new clause "m" should be amended as follows:</p> <p>"m) maintain the ability <u>Enable the reasonable operational, maintenance and minor upgrade requirements</u> of existing infrastructure <u>and essential structures</u> to operate within their design parameters."</p>
Policy 2.2.4 - Managing outstanding natural features, landscapes and seascapes			
Contact Energy Limited (74)	<ul style="list-style-type: none"> Amend Policy 2.2.4 a) to read as follows: "Avoid <u>significant</u> adverse effects on those values which contribute to the significance of <u>make</u> the natural feature, landscape or seascape <u>outstanding</u>." Delete Policy 2.2.4 b). 	Support	<p>Aurora agrees that this policy requires some clarity to ensure that it is only the "significant" adverse effects on outstanding natural landscapes, features and seascapes are avoided.</p> <p>The amendments proposed provide the greater clarity required.</p>
Policy 3.2.5 - Assessing activities for natural hazard risk			
Pioneer Generation Limited (142)	<p>Amend as follows:</p> <p>"Assess activities for natural hazard risk, by considering: ...</p> <p>d) Flow-on effects of the risk to other activities, individuals and communities; and</p> <p>e) The availability of, and ability to provide, lifeline utilities, and essential and emergency services, during and after a natural hazard event.; <u>and</u></p> <p><u>f) The extent to which an activity is functionally required to locate within a natural hazard risk area."</u></p>	Support	<p>Aurora agrees that Policy 3.2.5 should be amended such that issues associated with "functional need" are a relevant consideration.</p> <p>This submission is aligned with the relief sought by Aurora in its original submissions.</p>
Policy 3.2.7 - Reducing existing natural hazard risk			
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) <u>New subdivision, use and development, shall:</u></p> <p>i. <u>be avoided in areas where the risks of natural hazards to people, property and infrastructure are assessed as being unacceptable;</u></p> <p><u>and</u></p>	Support	<p>Aurora agrees that it is important to ensure that there is flexibility in the policy to avoid unintended consequences for existing and new development in the region.</p> <p>The proposed wording changes proposed by the submitter for Policy 3.2.7 is therefore supported.</p>

Submitter	Decision Requested	Aurora's Position	Further Submission
	<p>ii. <u>otherwise be undertaken in a manner that ensures the risks of natural hazards to people, property and infrastructure are appropriately mitigated;</u></p> <p>b) <u>Except that new infrastructure may be located in areas where the risks of natural hazards to people, property and other infrastructure are assessed as being unacceptable, provided that:</u></p> <p>i. <u>there is no reasonable alternative; and</u></p> <p>ii. <u>the strategic infrastructure has been designed to maintain, as far as practicable, its integrity and form during natural hazard events.</u></p> <p>iii. <u>The natural hazard risks to people, property and infrastructure are appropriately mitigated."</u></p>		
Introduction to Objective 3.4			
Dunedin City Council (156)	<p>In the event [Objective 3.4] is retained, clarify what is meant by "services" in the explanation.</p> <p>In the event [Objective 3.4] is retained, amend the explanation as follows: <u>Infrastructure is diverse, and includes the assets and services of water supply, drainage, irrigation, electricity, telecommunication, roads and ports. It may service individual farms or developments, towns, the wider region, or contribute to the national network. It may be public or private. Infrastructure is essential. It supports It is essential for Otago's economy and the wellbeing and health and safety of its communities, that the people of Otago are serviced by the right infrastructure at the right time. Some infrastructure is provided by local authorities (such as water supply, wastewater and storm water) while others are managed by private companies. Local authorities have a role to play, to ensure that the local and regional infrastructure needs are being met. Good quality infrastructure is cost effective, and meets the needs of the communities it services. Various legislation provides for and supports provision of infrastructure. New development should complement existing infrastructure where possible.</u></p>	Support	Aurora supports the proposed changes to the Introduction to Objective 3.4. The proposed changes provide greater clarity in terms of what constitutes "services" within the context of this Objective.
Policy 3.4.1 - Integrating infrastructure with land use			
Radio New Zealand Limited (57)	<p>Retain this policy with the following amendment (or words to similar effect):</p> <p>e) <u>Avoiding issues of land use incompatibility by preventing new activities from taking place in locations where those activities are likely to be sensitive to the effects from regionally or nationally significant infrastructure.</u></p>	Support	<p>Aurora agrees that it is appropriate that a policy addressing integration of land use should specifically refer to the importance of development and new activities avoiding adverse effects on established infrastructure.</p> <p>This submission is aligned with the relief sought by Aurora in its original submissions.</p>

Submitter	Decision Requested	Aurora's Position	Further Submission
Policy 3.4.2 - Managing infrastructure activities			
Transpower New Zealand Limited (97)	<p>"Manage infrastructure activities, to: ... b) Reduce adverse effects of those activities, <u>where practicable</u> including cumulative... ... e) Protect <u>existing and future</u> infrastructure corridors <u>by ensuring that development within these corridors does not generate adverse effects on the infrastructure, including the ability of that infrastructure to be accessed, operated, maintained and/or upgraded; for infrastructure needs, now and for the future;</u> ... g) Protect the <u>functioning</u> functional and operational requirements ..."</p>	Support	<p>Aurora supports the proposed amendments to Policy 3.4.2. In particular, Aurora considers it is appropriate that the PRPS should seek to restrict activities that may potentially result in reverse sensitivity effects on national and regionally significant electricity assets. Promotion of infrastructure corridors is therefore strongly supported.</p> <p>This submission is aligned with the relief sought by Aurora in its original submissions.</p>
Federated Farmers of New Zealand (115)	<p>"Manage infrastructure activities, to: ... b) Reduce adverse effects of those activities, including cumulative adverse effects on natural and physical resources, <u>primary production and existing land uses</u>; and ... e) Protect infrastructure corridors <u>from incompatible activities for infrastructure needs, now and for the future;</u> and...</p>	Oppose	<p>Aurora opposes this submission as the changes proposed to Policy 3.4.2 (b) are not considered necessary. The policy as notified already covers adverse effects on natural and physical resources. Aurora submits that there is no reason why primacy should be given to primary production in this section of the PRPS. There are already proposed provisions relating to the management of activities in rural areas under Objective 4.3 and Policy 4.3.1.</p> <p>In addition, the changes to Policy 3.4.2 (e) are not supported as the phraseology proposed will create uncertainty. Aurora consider that clause "e" should be amended as follows:</p> <p>e) Protect infrastructure corridors <u>from inappropriate subdivision, use and development for infrastructure needs, now and for the future;</u> and ..</p> <p>The above wording is better aligned with Part 2 of the RMA.</p>
Horticulture New Zealand (124)	<p>Amend Policy 3.4.2 as follows: "e) <u>Managing infrastructure corridors for nationally important infrastructure needs, recognising the existing land uses through which they pass. Protect infrastructure corridors for infrastructure needs, now and for the future;</u> and..."</p>	Oppose	<p>The changes proposed to Policy 3.4.2 (e) are not supported by Aurora as the proposed wording does not align with Part 2 of the RMA. As outlined above, Aurora consider that clause "e" should be amended as follows:</p> <p>e) Protect infrastructure corridors <u>from inappropriate subdivision, use and development for infrastructure needs, now and for the future;</u> and ..</p>
Objective 3.5 - Infrastructure of national and regional significance is managed in a sustainable way			
Dunedin City Council (156)	<ul style="list-style-type: none"> Amend the objective, issue and need to clarify why these provisions should only apply to regionally and nationally significant infrastructure (as defined in Policy 3.5.1), and not locally important public (or even all) infrastructure. Alternatively, recognise locally important infrastructure in a similar manner in the objective and related provisions. 	Support	<p>Aurora agrees that it is unclear why infrastructure of regional and national importance constitutes a separate issue and different policy framework.</p> <p>As outlined in Aurora's original submission Aurora's regionally significant distribution assets should be identified and addressed in this section of the PRPS rather than as a separate section under Policy 3.6.5.</p>

Submitter	Decision Requested	Aurora's Position	Further Submission
Policy 3.5.1 - Recognising national and regional significance of infrastructure			
Transpower New Zealand Limited (97)	<p>Amend as follows:</p> <p><u>"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:</u></p> <p>...</p> <p><u>b) The National Grid Electricity transmission infrastructure;</u></p> <p>and</p>	Support in part	<p>Aurora's assets are regionally significant within Otago, and should be provided for within the PRPS. While Aurora agrees that Policy 3.5.1 should be widened to include "operation, maintenance and upgrade" of assets as proposed by the submitter, Aurora opposes Policy 3.5.1(b) being amended to refer only to the National Grid. As outlined in Aurora's original submission, Policy 3.5.1(b) should be expanded to include the regionally significant electricity distribution infrastructure as well.</p> <p>To address this issue, Aurora submits that Policy 3.5.1 (b) should be amended as follows:</p> <p><u>b) The National Grid Electricity Transmission infrastructure and regional electricity distribution networks</u></p> <p>Or similar wording to same effect.</p>
Policy 3.5.2 - Managing adverse effects of infrastructure that has national or regional significance			
Transpower New Zealand Limited (97)	<p>Amend as follows:</p> <p><u>"In managing the effects Minimise adverse effects from infrastructure that has national or regional significance, territorial authorities shall take into account the following by:</u></p> <p>a) <u>The constraints imposed by the technical, operational and locational requirements of the infrastructure when considering</u></p> <p><u>Giving preference to avoiding their location in:</u></p> <p>...</p> <p>b) <u>Where it is not possible to avoid locating in the areas listed in a) above, having regard to the extent to which avoiding significant adverse effects have been avoided, remedied or mitigated, including reducing adverse effects; on those values that contribute to the significant or outstanding nature of those areas; and</u></p> <p>e) <u>Avoiding, remedying or mitigating other adverse effects on values;</u></p> <p>and</p> <p>...</p> <p>e) <u>Considering the use of offsetting, or other compensatory measures, for residual adverse effects on indigenous biodiversity.</u></p> <p>e) <u>The benefits of the infrastructure; and</u></p> <p>f) <u>If infrastructure is proposed across regional or district boundaries, apply a consistent and coordinated approach to the provisions."</u></p>	Support	<p>Aurora supports the amendments proposed by the submitted in relation to Policy 3.5.2, particularly in relation to the recognition of technical and operational limitations on the placement of infrastructure and by including consideration of the benefits of the electricity transmission and distribution networks.</p> <p>This provides a more balanced policy framework within which transmission and distribution networks should be considered.</p>
Policy 3.6.5 - Protecting electricity distribution infrastructure			
Federated Farmers of New Zealand (115)	<p>Replace clause a) with clause d)</p> <p>Amend as follows (or words to similar effect):</p> <p><u>"Policy 3.6.5 Protecting electricity distribution <u>transmission</u> infrastructure</u></p>	Oppose	<p>Aurora opposes the amendments to Policy 3.6.5 as proposed by the submitter. For a number of reasons.</p> <p>1. The submitter seeks to replace the references to "distribution" with "transmission" within the policy. This would result in provision for</p>

Submitter	Decision Requested	Aurora's Position	Further Submission
	<p>Protect electricity distribution <u>transmission</u> infrastructure, by:</p> <p>a) Recognising the functional needs of electricity distribution <u>transmission</u> activities; and</p> <p>b) Restricting the establishment of these incompatible activities that may result in <u>significant</u> reverse sensitivity effects; and ...</p> <p>d) Assessing the significance of adverse effects on those needs, as detailed in Schedule 3; and</p> <p>e) Protecting existing distribution corridors for infrastructure needs, now and for the future</p>		<p>Aurora's regionally significant infrastructure being excluded from consideration within the PRPS. This is opposed. As outlined in Aurora's original submission, there are three stages of electric power supply; generation, transmission and distribution, and provision should be made within the PRPS for the activities associated with each stage.</p> <p>2. The submitter highlights that there are existing regulatory & non-regulatory documents which territorial local authorities are already required to 'give effect to' or which address the harm to human communities, and the threat from incompatible activities to infrastructure. In its submission the submitter mentions the New Zealand Electrical Code for Practice for Electrical Safe Distances 2001 ("NZECP 34: 2001") but not the Electricity (Hazards from Trees) Regulations 2003. Aurora submit, that if the provisions in these codes of practice and regulations were complied with, then measures to protect infrastructure corridors would be negated. Unfortunately, there are many instances throughout the Otago Region, where compliance with the provisions of these documents have not been adhered to, which is of great concern to Aurora. As such protection of infrastructure corridors for electricity distribution assets is required.</p> <p>3. As discussed in Aurora's original submission and above, Aurora is supportive of provisions which seek to protect its regionally significant infrastructure. The corridor protection provisions promoted under the PRPS, are appropriate and Aurora objects to the suggestion that such provision should be deleted in relation to its distribution assets. Aurora submit that it is appropriate for the PRPS to provide direction to the district planning process in this manner. Regionally Significant and Critical Infrastructure (such as Aurora's distribution assets) can be vulnerable to inappropriate subdivision or proximity to land use development, as such activities can restrict access and affect the ability to maintain network assets. The protection of such corridors will assist in ensuring that Aurora can continue to provide a resilient electricity network.</p>
<p>Horticulture New Zealand (124)</p>	<p>Amend as follows:</p> <p>"<u>Managing</u> Protect electricity distribution infrastructure, by:</p> <p>...</p> <p>c) Ensuring existing land uses are not penalised by location of electricity distribution infrastructure. Avoiding, remedying or mitigating adverse effects from other activities on the functional needs of that infrastructure; and</p> <p>...</p> <p>e) Protect infrastructure corridors for nationally important infrastructure needs, recognising the existing land uses through which they pass. Protecting existing distribution corridors for infrastructure needs, now and for the future."</p>	<p>Oppose</p>	<p>Aurora opposes the amendments to Policy 3.6.5 as proposed by the submitter.</p> <p>As discussed in Aurora's original submission and above, Aurora is supportive of provisions which seek to protect its regionally significant infrastructure. The corridor protection provisions promoted under the PRPS are appropriate. Regionally Significant and Critical Infrastructure can be vulnerable to inappropriate subdivision or proximity to land use development, as such activities can restrict access and affect the ability to maintain network assets. The protection of such corridors will assist in ensuring that Aurora can continue to provide a resilient electricity network.</p>

Submitter	Decision Requested	Aurora's Position	Further Submission
Glossary			
Transpower New Zealand Limited (97)	<p>Amend Infrastructure definition as follows:</p> <p>"d) Facilities for the generation <u>or transmission</u> of electricity <u>such as substations</u>, lines used or intended to be used to convey <u>transmit or distribute</u> electricity and support structures for lines used or intended to be used to convey <u>transmit or convey</u> electricity, excluding facilities, lines and support structures..."</p>	Support in part	<p>Aurora agrees with the proposed changes to clause "d" of the definition of <i>Infrastructure</i> subject to one minor amendment, which will ensure that Aurora's distribution assets are also adequately provided for.</p> <p>Amend Infrastructure definition as follows:</p> <p>"d) Facilities for the generation, or transmission <u>and distribution</u> of electricity <u>such as substations</u>, lines used or intended to be used to convey <u>transmit or distribute</u> electricity and support structures for lines used or intended to be used to convey <u>transmit or convey</u> electricity, excluding facilities, lines and support structures..."</p>

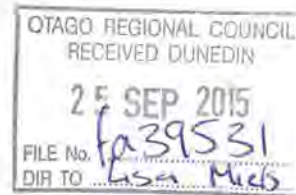
1017

Further Submission on the Proposed Regional Policy Statement for Otago

(Closing date: 25 September 2015, 5pm)

To: Otago Regional Council
Private Bag
Dunedin

Email: rps@orc.govt.nz



Full Name of Further Submitter:
Horticulture NZ

Full Postal Address:
P O Box 10 232
Wellington, 6143

Attn: Eve Williams

Telephone Number: 04 470 5668
Email: eve.williams@hortnz.co.nz

Fax Number: 04 471 2861

Horticulture New Zealand represents horticultural growers in the Otago Region, so represents a relevant aspect of the public interest.

Horticulture New Zealand is not a trade competitor and would not gain any advantage through this further submission.

I do wish to be heard in support of my submission

If others make a similar submission, I **would not** be prepared to consider preparing a joint case with them at any hearing.

.....
Signature of person making submission or person authorised to sign on behalf of person making submission.

Chris Keenan
Manager, Natural Resources and Environment
Horticulture NZ

Date:
25 September 2015

7101

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
McKeague Consultancy Ltd	89	3 Whole RPS (Overall approach)	Amend all policies using the word "avoid", particularly those without a qualifying statement such as "where avoidance is not possible, remedy...", to "avoid or minimise" or delete the word "avoid" and replace with "minimise".	Support	The use of the word 'avoid' or 'prevent' in the PRPS needs to be reassessed in the light of the King Salmon decision.
Fonterra Co-operative Group Ltd	99	3 Whole RPS (Overall approach)	The amended document should, as a starting point, clearly identify the regionally significant issues that need to be addressed, following which, it should set out the objectives, policies and methods to address those issues. <ul style="list-style-type: none"> • Amend the PRPS to include a new section or statement setting out a clear, coherent, integrated strategy focussing specifically on the management of natural and physical resources. • Create additional provisions which specifically relate to regionally significant industry. These can adopt the model used in relation to regionally and nationally significant infrastructure. • Include more explicit provisions that recognise and provide for natural and physical resources to be used for the benefit of the social and economic well-being of the community. 	Support	The use of the word 'avoid' or 'prevent' in the PRPS needs to be reassessed in the light of the King Salmon decision. A statement of regionally significant issues would assist in the structure of the PRPS and provide greater clarity and focus.
Federated Farmers of NZ	115	3 Whole RPS (Overall approach)	1) Frame the RPS with key issues, to provide a better linkage between the higher level intentions and the subsequent methods and policies. 2) Review the use of the words 'avoid', 'prevent' or 'require' in light of King Salmon and the implications for the region's resource use. 3) Where relevant the RPS should step back from giving prescriptive directions to individual Territorial Local Authorities (TLAs). TLAs should have sufficient scope to address local issues and opportunities within the local context through local planning processes.	Support	The use of the word 'avoid' or 'prevent' in the PRPS needs to be reassessed in the light of the King Salmon decision. A statement of regionally significant issues would assist in the structure of the PRPS and provide greater clarity and focus. A more positive forward looking approach is supported.
Otago and Central South Island Fish and Game Councils	118	3 Whole RPS (Overall approach)	Insert a list of regionally significant resource management issues in Part A, as follows: <u>"Regionally Significant Resource Management Issues</u> (Refer to submission)	Support in part	A statement of regionally significant issues would assist in the structure of the PRPS and provide greater clarity and focus. However the list of issues sought does not include all matters identified in the PRPS.
Ravensdown Works Ltd	143	3 Whole RPS (Overall approach)	With regard to the use of the words "values" and "outcomes", amend to specify values and outcomes sought.	Support	The use of the words 'values' and 'outcomes' needs to be clarified as it presents uncertainty as to what the PRPS is seeking to achieve.

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Forest and Bird NZ	98	259 Regionally significant issues	Re write the issues for the region so that they are in accordance with Section 59 and 62 (RMA) to provide a more detailed overview of the significant issues including indigenous biodiversity, the regional matters of National Importance (S6 RMA). • Re write the objectives so that they deal with each of the regionally significant resource issues, rather than generalised outcomes, and provide clear reasons and explanations for Objectives and Policies.	Support in part	A statement of regionally significant issues would assist in the structure of the PRPS and provide greater clarity and focus. However the list of issues sought does not include all matters identified in the PRPS.
Central Otago District Council	37	259 Regionally significant issues	State the significant resource management issues for the Otago region.	Support	A statement of regionally significant issues would assist in the structure of the PRPS and provide greater clarity and focus.
Fonterra Co-operative Group Ltd	99	4 Introduction RPS Framework	Amend the fourth outcome of the RPS Framework to read: As set out in submission	Support in part	The wording sought would provide greater clarity and identification of values in the PRPS.
Otago and Central South Island Fish and Game Councils	118	4 Introduction RPS Framework	Amend the description of "Otago has high quality natural resources and ecosystems" (p.11) as follows: <u>"Otago's natural resources are valued for their intrinsic values, and whilst society relies heavily on the systems and services of the natural environment, the recognition, protection, and sustainable management of the intrinsic values of natural resources and their ecosystems is paramount.</u> This chapter addresses ... rely on having a great <u>high</u> quality environment	Oppose in part	The focus of the values should be on more than intrinsic values. There needs to be greater clarity of values and their identification.
Dunedin City Council	156	4 Introduction RPS Framework	Amend text as follows: Otago has high quality natural resources and ecosystems. Society relies heavily on the systems and services of The natural environment <u>provides a sense of place and wellbeing, and in turn the quality of our environment affects our quality of life. Otago has a unique natural environment.</u> [describe what makes Otago unique here]. This chapter addresses our fundamental reliance on natural resources and ecosystem services to sustain us, our way of life, cultural identity and our economy. Agriculture and tourism, Otago's biggest earners, both rely on having a great environment. The chapter deals with <u>maintaining and enhancing the intrinsic values of the natural</u> resources that are most important to us, and the inherent qualities of the natural environment that give it value beyond human use. People are able to use and enjoy our natural and built environment. Our individual and community wellbeing is built <u>not only on our natural environment, but on use and development of its</u> resources. This fourth chapter builds on the previous ones by enabling people to use the natural and physical environment for enjoyment and making a living, while ensuring that resources are sustained. It also deals with managing conflicting or incompatible uses, hazardous substances and waste.	Oppose in part	The focus of the values should be on more than intrinsic values. There needs to be greater clarity of values and their identification. There needs to be explicit recognition of agriculture and tourism as they are significant to the region.

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Contact Energy Ltd	74	261 Need 1	Amend paragraph 2 under "Need" under Objective 1.1 (p.16) as follows: "Local authorities need to find a way to incorporate give effect to these principles in their decision making that ensures they are properly applied, and that accounts for the effects of resource management decisions on..."	Support	Deletion of 'give effect to' will reduce potential confusion in implementing the objective.
Contact Energy Ltd	74	263 Introduction to Objective 1.1	<ul style="list-style-type: none"> Amend the first paragraph, second sentence of the explanatory text under Objective 1.1 (p.17) as follows: "It can be challenging to effectively incorporate these principles in resource management decision making, so deliberate measures need to be taken to ensure the principles are properly understood and given effect to <u>taken into account</u>." Amend the third paragraph of the explanatory text under Objective 1.1 (p.17) as follows: "A partnership approach, which involves Kai Tahu and elevates their values, rights and interests in decision making processes, enables the principles, including kaitiakitaka, to be given effect <u>taken into account</u>." 	Support	Deletion of 'give effect to' will reduce potential confusion in implementing the objective.
Federated Farmers on NZ	115	263 Introduction to Objective 1.1	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	The word 'elevates' is inappropriate.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	13 Policy 1.1.1 Promoting awareness of treaty obligations	Amend policy as follows: "Promoting awareness and understanding of the Treaty Partnership obligations "	Support	Inclusion of 'understanding' is appropriate.
Transpower NZ Ltd	97	14 Policy 1.1.2 Taking the principles of the Treaty of Waitangi into account	Amend the text as follows: "Ensure that local authorities exercise their functions and powers to a) Accord Kai Tahu a status distinct from that of interest groups and members of the public, consistent with their position as a Treaty partner, and b) involve Kai Tahu in resource management decision making processes and implementation, and c) Take into account Kai Tahu views <u>values</u> in resource management..."	Support	The elevation in the PRPS is contrary to Pt 2 of the RMA.
Federated Farmers on NZ	115	14 Policy 1.1.2 Taking the principles of the Treaty of Waitangi into account	Amend policy as set out in submission: to support partnership approach, not elevation	Support in part	The elevation in the PRPS is contrary to Pt 2 of the RMA. The wording sought by Transpower provides greater clarity.
Federated Farmers on NZ	115	14 Policy 1.2.1 Managing the natural environment to support Kai Tahu wellbeing	Amend as follows (or words to similar effect): "Manage the natural environment to support Kai Tahu wellbeing by: a) Ensuring resources support their customary uses and cultural values are identified (as detailed in Schedules 1A and B); and b) Safe guarding the life supporting capacity of natural resources)"	Support	The change sought ensures that Kai Tahu wellbeing is supported in an appropriate way.

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Transpower NZ Ltd	97	20 Policy 1.2.3 Protecting important sites and values of cultural significance to Kai Tahu	Amend a) as follows: "a) Avoiding significant adverse effects on those values and sites, as detailed in Schedule 3, <u>to the extent practicable</u> , and..."	Support	The use of the word 'avoid' or 'prevent' in the PRPS needs to be reassessed in the light of the King Salmon decision.
Federated Farmers on NZ	115	20 Policy 1.2.3 Protecting important sites and values of cultural significance to Kai Tahu	Amend as follows (or words to similar effect): " Protecting + Important sites and values of cultural significance to Kai Tahu <u>are identified and managed</u> " " Protect + <u>Identify</u> important values, as detailed in schedules 1A and B, and sites of cultural significance to Kai Tahu as detailed in Schedule 1C, and <u>manage these by</u>	Support	The use of the word 'protect' in the PRPS needs to be reassessed in the light of the King Salmon decision.
Central Otago Environmental Society	59	24 Chapter B2 General requests	Amend to include/explain that "integration" requires the RPS be based on the following fundamental principles: As set out in submission	Oppose	The submission sets out the 'principles' that the submitter considers important for integration relating to a limited number of matters, not across the whole suite of PRPS provisions.
Forest and Bird NZ	98	24 Chapter B2 General requests	Reword to read: "The values and life supporting capacity of Otago's natural and physical resources are recognised, maintained and enhanced." Add objectives relating to a range of matters.	Oppose in part	Recognition of life supporting capacity is consistent with Pt 2 of the RMA, but Horticulture NZ is concerned that values need to be identified through a public process.
Environmental Defence Society Inc	127	24 Chapter B2 General requests	Include a chapter focused on freshwater and incorporate the necessary provisions as required by the NPSFM.	Support in part	The inclusion of reference to the NPSFM is appropriate in the PRPS but the extent to which matters are included in the PRPS or regional plan needs to be addressed.
Environmental Defence Society Inc	127	24 Chapter B2 General requests	Develop specific measureable objectives addressing freshwater, and covering inter alia: As set out in the submission	Oppose in part	The inclusion of reference to the NPSFM is appropriate in the PRPS but specific freshwater objectives should be addressed in the Regional Plan.
Dunedin City Council	156	24 Chapter B2 General requests	Amend [Chapter 2] to better clarify the differences (between): "Part B Chapter 2 [and Chapter] 4 People are able to use and enjoy Otago's natural and built environment".	Oppose in part	The submitter considers that the focus of Ch 2 is intrinsic values rather than use or consumptive values. There needs to be greater clarity of values and their identification.
Waitaki District Council	70	265 Outcome 2 and Introduction	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 <u>maintain</u> for future generations."	Support	The change is consistent with Part 2 of the RMA.
Forest and Bird NZ	98	25 Issue 2.1 Degradation of Otago's natural resources	Rewrite the issue to issues that specifically address a list of matters in the submission.	Oppose in part	The issues for the region are not just natural values.
Otago and Central South Island Fish and Game Councils	118	25 Issue 2.1 Degradation of Otago's natural resources	Amend as follows: "Degradation of <u>the</u> values and of natural systems risks loss of complexity, which in turn jeopardises the life-sustaining supporting capacity of the environment, and the ecosystem services provided <u>by this environment</u> to the community..."	Oppose in part	The issues for the region are not just natural values.

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Fertiliser Association of NZ	110	29 Objective 2.1 The values of natural resources are recognised, maintained and enhanced.	Amend as follows: "The values of Otago's natural and physical resources are recognised, maintained and <u>or</u> enhanced."	Support in part	The Horticulture NZ submission seeks changes to the Objective but the change sought by the submitter is also supported as it is more consistent with the RMA.
Fonterra Co-operative Group Ltd	99	269 Introduction to Objective 2.1	Amend the explanatory text to Objective 1 as set out in the submission to better explain the nature of the issues affects the management of physical and natural resources.	Support in part	The wording sought provides greater clarity.
Ospri	68	30 Policy suite 2.1 The value of natural resources are recognised, maintained and enhanced.	Remove "avoid" from the clause "Avoid the adverse effects of pest species..." in policies 2.1.1 - 2.1.6 and ensure consistency with other policies which state that adverse effects need to be controlled. • Clearly identify in the methods how this policy is to be given effect to	Oppose in part	'Avoid' is appropriate for wanting to ensure that unwanted organisms aren't found in NZ. Control may be an appropriate policy response in terms of established pests.
Meridian Energy Ltd	82	30 Policy suite 2.1 The value of natural resources are recognised, maintained and enhanced.	Delete policies 2.1.1 and 2.1.2 and add the following new Policy as set out in submission.	Support in part	The submission seeks to avoid duplication and ensure that 'protection is applied appropriately.
Fonterra Co-operative Group Ltd	99	30 Policy suite 2.1 The value of natural resources are recognised, maintained and enhanced.	Identify values then set measurable limits and targets to achieve overall water quality improvements in freshwater bodies	Support	The submission would assist in giving effect to the NPSFM.
Dunedin City Council	156	30 Policy suite 2.1 The value of natural resources are recognised, maintained and enhanced.	Amend as follows: " avoid the adverse effects of pest species, prevent their introduction and reduce their spread <u>Manage activities to reduce the risk of introduction, the spread, or the effects, of pest species</u>	Oppose in part	'Avoid' is appropriate for wanting to ensure that unwanted organisms aren't found in NZ. Manage may be an appropriate policy response in terms of established pests.
Fonterra Co-operative Group Ltd	99	31 Policy 2.1.1 Managing for freshwater values	Delete Policy 2.1.1 and replace with a new policy or policies setting out the direction that is to be followed to achieve Objective 2.1, the aspects of the resource that are required to be managed, the criteria and thresholds that are to be attained or protected, including the setting of measurable limits or targets for freshwater management units to achieve overall water quality improvements.	Support in part	The policy would provide greater clarity and would assist in giving effect to the NPSFM.

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Environmental Defence Society Inc	127	31 Policy 2.1.1 Managing for freshwater values	Re-classify as a series of objectives identifying the key freshwater outcomes sought. Appropriate policies will [be] needed to complement each objective. <ul style="list-style-type: none"> • Amend the chapter to identify the activities which need to be managed in order to achieve the outcomes sought in clauses (a) - (p). • Amend clause (c) to clarify that protection of the significant values of all wetlands is required. • Amend clause (g) to clarify the relationship between coastal and freshwater values, for example through identifying transition areas where fresh and coastal waters intersect. • Amend clause (l) to refer to maintenance of water quality and other freshwater attributes such as flow, required for recreation purposes. • Amend clause (k) to refer to preventing pest species as far as possible. • Amend clause (p) to provide for the maintenance of existing infrastructure within freshwater limits. 	Oppose in part	The policy could be rewritten without making new objectives. Giving effect to the NPSFM in the PRPS should be to provide broad direction which is implemented through the regional plan.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	31 Policy 2.1.1 Managing for freshwater values	Submitter seeks further policies that seek to 'avoid' discharges to water and land	Oppose in part	A policy of 'avoid' is too prescriptive given the case law in King Salmon.
Fonterra Co-operative Group Ltd	99	32 Policy 2.1.2 Managing for the values of beds of rivers and lakes, wetlands and their margins	Delete policy 2.1.2	Support	Horticulture NZ supports the submission which seeks to combine Policy 2.1.1 and 2.1.2.
Environmental Defence Society Inc	127	32 Policy 2.1.2 Managing for the values of beds of rivers and lakes, wetlands and their margins	Re-classify as a series of objectives identifying the key freshwater outcomes sought, where appropriate. Appropriate policies will need to complement each objective. <ul style="list-style-type: none"> • Amend clauses (a)-(l) to respond to the concerns outlined. 	Oppose in part	The policy could be rewritten as a policy rather than as objectives. Giving effect to the NPSFM in the PRPS should be to provide broad direction which is implemented through the regional plan.
Egg Producers Federation of NZ	29	34 Policy 2.1.4 Managing for air quality values	Add subclause to Policy 2.1.4: "d) - <u>Enable rural production activities in appropriate locations by allowing for minor and localised degradation of amenity.</u> "	Support	Discharges to air need to reflect the receiving environment in which they are located, such as discharges from rural production activities in rural areas.
Fonterra Co-operative Group Ltd	99	34 Policy 2.1.4 Managing for air quality values	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.	Support in part	It is essential that the values are identified.
Egg Producers Federation of NZ	29	35 Policy 2.1.5 Managing for soil values	Replace "soil" by "land" throughout the Policy	Support	The focus should be on the attributes of 'land' – of which soil is one attribute. A production system requires more than 'soil'.

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
NZ Pork Industry Board	83	35 Policy 2.1.5 Managing for soil values	Include a policy of protecting productive soils from fragmentation or inappropriate use by activities that do not have a functional need to be located in the rural environment	Support	The policy would ensure that rural production is enabled.
Forest and Bird NZ	98	40 Objective 2.2 Otago's significant and highly valued natural resources	<ul style="list-style-type: none"> Amend to read: "Otago's significant and highly valued natural resources, indigenous vegetation, habitats and indigenous biodiversity are consistently identified and protected" 	Oppose in part	While Section 6 requires the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna it does not require protection of all natural resources so the objective sought is not appropriate.
OSPRI	68	41 Policy suite 2.2 Otago's significant and highly valued natural resources	<ul style="list-style-type: none"> Amend policies 2.2.4, 2.2.6, 2.2.9, 2.2.13 to ensure consistency with other policies relating to the "adverse effects of pest species" Clearly identify in the methods how provision of these policies is to be given effect to 	Oppose in part	Horticulture NZ seeks that 'avoid' is used for ensuring that unwanted organisms aren't found in NZ. Controlling adverse effects may be an appropriate policy response in terms of established pests.
Forest and Bird NZ	98	41 Policy suite 2.2 Otago's significant and highly valued natural resources	New Policy 2.2.8 "Identify the landward extent of margins of all freshwater bodies using the following criteria - as set out in submission:	Oppose in part	It is unclear why the spatial extent of all freshwater bodies is necessary to achieve the objectives and policies.
McKeague Consultancy Ltd	89	54 Identifying outstanding water bodies and wetlands	Provide greater detail of what constitutes a significant value <ul style="list-style-type: none"> Provide clarity around what a hydrological value is Provide clarity as to whether all of these criteria need to be present or just one 	Support in part	Horticulture NZ seeks clarity around identification of values and supports the submissions which seek clarification as to what are 'significant values'.
Otago and Central South Island Fish and Game Councils	118	54 Identifying outstanding water bodies and wetlands	"Identify outstanding water bodies and wetlands and their amenity or intrinsic values, using the following criteria - amended as in submission	Oppose in part	Values for outstanding water bodies may not be limited to amenity or intrinsic values.
Environmental Defence Society Inc	127	54 Policy 2.2.12 Identifying outstanding water bodies and wetlands	Amend Policy 2.2.12 as follows <ul style="list-style-type: none"> Provide for the identification of the "significant values" of wetlands. Amend the criteria to clarify and expand the specific "values" relevant under each sub clause to provide greater direction 	Support in part	The submitter seeks clarification as to how the identification criteria will be applied as they are broad and subjective. This is supported.
McKeague Consultancy Ltd	89	55 Policy 2.2.13 Managing outstanding water bodies and wetlands	Replace "avoid" with "avoid and minimise" or "minimise" [in Policy 2.2.13]. <ul style="list-style-type: none"> Delete [Policy 2.2.13] (b). 	Support in part	The use of the word 'avoid' or 'prevent' in the PRPS needs to be reassessed in the light of the King Salmon decision.
Environmental Defence Society Inc	127	55 Policy 2.2.13 Managing outstanding water bodies and wetlands	Amend the RPS to: <ul style="list-style-type: none"> Include specific freshwater objectives, including objectives relating to freshwater bodies and wetlands. Require avoidance of permanent loss of 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 	Oppose in part	Giving effect to the NPSFM in the PRPS should be to provide broad direction which is implemented through the regional plan.
Egg Producers Federation of NZ	29	56 Policy 2.2.14 Identifying highly valued soil resources	Replace "soil" by "land" throughout the Policy	Support	The focus should be on the attributes of 'land' – of which soil is one attribute. A production system requires more than 'soil'.

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
McKeague Consultancy Ltd	89	56 Policy 2.2.14 Identifying highly valued soil resources	<ul style="list-style-type: none"> • Include highly productive soils. • Include an "or" in the list. 	Support	Land and soils are highly valued for production which may, but not be limited to, versatile soils.
Egg Producers Federation of NZ	29	57 Policy 2.2.15 Managing highly valued soil resources	Replace "soil" by "land" throughout the Policy	Support	The focus should be on the attributes of 'land' – of which soil is one attribute. A production system requires more than 'soil'.
Central Otago District Council	37	57 Policy 2.2.15 Managing highly valued soil resources	<ul style="list-style-type: none"> • Refer to "highly valued soils". • Delete Policy 2.2.15 c). 	Support in part	Focus on 'highly valued' is supported but should be land, not soils per se.
AgResearch Ltd	116	57 Policy 2.2.15 Managing highly valued soil resources	<p>Amend as follows: "Protect the values of areas of highly valued soil resources, by: ... d) Recognising that urban expansion may be appropriate due to location and proximity to existing urban development and infrastructure <u>while avoiding reverse sensitivity effects on rural production activities (unless there is no other suitable land available adjacent to existing urban areas)."</u> add the following new clauses: " e) <u>Avoiding the use of highly values soils for rural residential purposes unless identified as part of a district growth strategy.</u> f) <u>Ensuring that land use activities on highly valued soils are consistent with the continued use of such soils in the vicinity for primary production purposes (e.g. there is a functional need for the activity to be established in rural areas)."</u></p>	Support in part	<p>The addition of recognition of reverse sensitivity is supported as it is a matter that can constrain the use of highly valued land.</p> <p>Horticulture NZ seeks that 'Protect' is replaced with 'provide for' so does not support that part of the submission.</p>
Fonterra Co-operative Group Ltd	99	62 Policy 2.3.3 Applying an integrated management approach for freshwater catchments	<ul style="list-style-type: none"> • Amend Policy 2.3.3 a) to read: "<u>a) Using consistent freshwater objectives for interconnected water bodies. Developing objectives, targets and limits for freshwater catchments based on those identified through the National Objectives Framework;</u> and". • Include an additional clause aa) to read: "<u>aa) Identifying through community and stakeholder involvement, the freshwater values to enable the establishment of freshwater objectives;</u> and " • Amend clause b) to read: "b) Recognising the importance of river morphology, catchment hydrology, natural processes, land cover <u>and the use of water</u> in defining regional catchment objectives <u>supporting catchment values;</u>" • Amend clause c)i) to read: "i. Maintain or enhance <u>overall</u> freshwater values; and". • Retain (c)ii. to iv as notified. 	Support	The approach will assist with implementing the NPSFM through regional plans.
Trustpower Ltd	85	62 Policy 2.3.3 Applying an integrated management approach for freshwater catchments	Amend to recognise that in achieving integrated management the human use and economic values of the resource should also be taken into account.	Support in part	The recognition of human use and economic values is supported.

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Fonterra Co-operative Group Ltd	99	65 Policy 2.3.3 Applying an integrated management approach for airsheds	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 <u>and economic changes</u> , and their effects on cumulative emissions; and b) Co-ordinating the management of land use and air quality, to: i <u>Maintain or enhance air quality values</u> <u>Achieve emission standards for airsheds</u> , and ii Reduce the potential for adverse health effects; and iii <u>Avoid the potential for reverse sensitivity nuisance effects.</u> "	Support in part	Horticulture NZ has also sought the deletion of nuisance effects and supports the inclusion of reverse sensitivity effects.
Z Energy, BOP Oil and Mobil Oil Ltd	128	65 Policy 2.3.3 Applying an integrated management approach for airsheds	Amend Policy 2.3.5 to address potential reverse sensitivity effects associated with the establishment or intensification of activities in proximity to established activities. This could be achieved by adding the following clause: " <u>b) iii. Restrict to the extent appropriate, the establishment or intensification of activities that may result in reverse sensitivity effects on established activities.</u> "	Support	Inclusion of reverse sensitivity effects is supported and it will assist with implementing the policy.
Fonterra Co-operative Group Ltd	99	65 B3 General requests	Amend to include new objective and policies relating to regionally significant industries, particularly primary production activities as set out in the submission	Support in part	Horticulture NZ seeks that primary production is adequately provided for and enabled by the PRPS.
Fonterra Co-operative Group Ltd	99	272 Outcome 3 and Introduction	Amend the introduction to explain the necessity for regionally significant industries, to have continued access to natural and physical resources as set out in the submission	Support in part	Horticulture NZ seeks that primary production is adequately provided for and enabled by the PRPS.
Fertiliser Assoc of NZ	110	78 Policy 3.1.1 Recognising natural and physical environmental constraints	Amend as follows: "Recognise the natural and physical environmental constraints of an area, the effects of those constraints on activities, and the effects of those activities on those constraints, including: a)... b)... c)... d)... e)... <u>Whilst taking into consideration opportunities for innovative and technological solutions to constraints.</u> "	Support	There should be recognition of the ability to use resources and that constraints are balanced with benefits.
Fonterra Co-operative Group Ltd	99	96 Objective 3.4 Good quality infrastructure and services meets community needs	Amend Objective 3.4 to read: "Objective 3.4 <u>Ensure Good quality</u> infrastructure and services <u>are available and</u> meet community needs."	Support	The words 'good quality' provide little guidance and clarity.
Dunedin City Council	156	97 Policy Suite 3.4 Good quality infrastructure and services meets community needs	In the event Objective 3.4 and Policies 3.5.3, 3.6.1 and 3.6.3 are retained, include an equivalent policy that: • Prioritises the use of water for community supplies. • Protects public local water supply infrastructure.	Oppose in part	Any priorities for allocation and use of water should be addressed in a Regional Plan where all priorities should be assessed.
Radio NZ Ltd	57	98 Policy 3.4.1 Integrating infrastructure with land use	Retain this policy with the following amendment (or words to similar effect): e) <u>Avoiding issues of land use incompatibility by preventing new activities from taking place in locations where those activities are likely to be sensitive to the effects from regionally or nationally significant infrastructure.</u>	Support in part	The issue of new incompatible land uses establishing near existing activities is an issue that is broader than just on infrastructure.

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Transpower NZ Ltd	97	98 Policy 3.4.1 Integrating infrastructure with land use	Amend the text of Policy 3.4.1 as follows: "Achieve the strategic integration of infrastructure with land use, by: a) Recognising the functional, technical, operational and locational needs of infrastructure of regional or national importance; b) Achieving a pattern, form and design of land use that does not adversely affect the efficient operation, use and upgrading of infrastructure of regional or national importance."	Support	The additions sought will give effect to the NPSET.
Fonterra Co-operative Group Ltd	99	98 Policy 3.4.1 Integrating infrastructure with land use	Amend Policy 3.4.1 to include recognition of regional significant industry and associated activities	Support	Horticulture NZ seeks that primary production is adequately provided for and enabled by the PRPS.
Power Net Ltd	60	104 Policy 3.5.1 Recognising national and regional significance of infrastructure	Amend policy as follows (or similar wording to achieve desired relief): "3.5.1 b) Electricity transmission and distribution infrastructure; ..."	Oppose	There needs to be a differentiation between transmission and distribution infrastructure and that there is a difference in the level of significance. Horticulture NZ does not consider that local distribution infrastructure is regionally significant.
Aurora Energy Ltd	76	104 Policy 3.5.1 Recognising national and regional significance of infrastructure	Amend "3.5.1 b) Electricity transmission and distribution infrastructure; ..."	Oppose	There needs to be a differentiation between transmission and distribution infrastructure and that there is a difference in the level of significance Horticulture NZ does not consider that local distribution infrastructure is regionally significant.
Dunedin City Council	156	104 Policy 3.5.1 Recognising national and regional significance of infrastructure	Delete Policy 3.5.1 and include as a definition in the glossary. Identify which Otago ports and airports meet this definition.	Support in part	There needs to be clear differentiation as to what is nationally and regionally significant infrastructure and the policy response to each.
Aurora Energy Ltd	76	113 Policy 3.6.5 Protecting electricity distribution infrastructure	Insert provisions relating to regionally significant and critical infrastructure (including electricity distribution assets) under Objective 3.4 and Objective 3.6.	Oppose	Policy 3.6.5 should focus on distribution infrastructure that is nationally significant. Horticulture NZ does not consider that local distribution infrastructure is regionally significant or critical infrastructure.
NZ Pork Industry Board	83	124 Policy 3.8.1 Managing for urban growth	Add " ... and avoids reverse sensitivity effects. " to Policy 3.8.1 c) i.	Support	Reverse sensitivity effects can compromise rural production activities and is a significant issue
Darby Planning LP	81	124 Policy 3.8.1 Managing for urban growth	Amend Policy 3.8.1 as set out in submission	Oppose	The submitter opposes the emphasis on rural production. However this is a significant issue that needs to be taken into account when assessing where growth may occur.
AgResearch Ltd	116	124 Policy 3.8.1 Managing for urban growth	"Manage urban growth and creation of new urban land in a strategic and co-ordinated way, by: ... c) Identifying and defining future growth areas that i Minimise adverse effects on rural-productivity production activities, including reverse sensitivity effects, loss of highly valued soils or creating competing urban demand for water and other resources; and ..."	Support	Reverse sensitivity effects can compromise rural production activities and is a significant issue.

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Dunedin City Council	156	124 Policy 3.8.1 Managing for urban growth	Managing for urban growth <u>development</u> . Amend the policy to include a focus on the development of compact and well-integrated urban areas, in line with Policy 3.6.6(a). <ul style="list-style-type: none"> Amend (c)(i) as follows: "...including loss of highly valuee <u>versatile</u> soils..." Amend (c)(ii) as follows: "Identifying future growth areas that: ... Maintain or enhance <u>Avoid</u> significant biodiversity, landscape or natural character values;" Delete (f). 	Oppose	Horticulture NZ supports the identification of highly valued land which is not necessarily limited to versatile soils.
Clutha District Council	28	127 Policy 3.8.3 Managing fragmentation of rural land	Reword Policy 3.8.3 as follows: <ul style="list-style-type: none"> b) iii "reverse sensitivity effects on rural productive activities can be avoided, <u>where possible</u>, and..." Remove d) "Avoid creating competing demand for water or other resources." 	Oppose	It is important that new subdivision and development of rural land does not lead to pressures on rural production. Reverse sensitivity and access to water are key issues. There are instances where subdivision has led to growers losing water to urban use and this is opposed.
Egg Producers Federation of NZ	29	127 Policy 3.8.3 Managing fragmentation of rural land	Replace "soil" by "land" throughout the Policy	Support	The focus should be on the attributes of 'land' – of which soil is one attribute. A production system requires more than 'soil'.
Radio NZ Ltd	57	127 Policy 3.8.3 Managing fragmentation of rural land	Retain this policy with the following addition (or words to similar effect): " e) <u>Avoid the potential for reverse sensitivity effects on established activities.</u> "	Support	Reverse sensitivity effects can compromise rural production activities and is a significant issue.
Darby Planning LP	81	127 Policy 3.8.3 Managing fragmentation of rural land	Amend policy to matters to have regard to.	Oppose	The policy provides direction and the submission seeking to downgrade it to matters to 'have regard to' loses the policy direction.
Fonterra Co-operative Group Ltd	99	127 Policy 3.8.3 Managing fragmentation of rural land	<ul style="list-style-type: none"> Delete clause a)iii. Reword Clause b) and b)ii to refer to "highly valued soils" in place of "highly versatile soils" Delete Clause d). 	Oppose in part Support in part	Deletion of clause d) is not supported as there are instances where subdivision has led to growers losing water to urban use. Reference to 'highly valued' is supported, but the focus should be on land rather than soils.
Federated Farmers of NZ	115	127 Policy 3.8.3 Managing fragmentation of rural land	Delete Policy 3.8.3	Oppose	Policy 3.8.3 provides direction to district councils when considering subdivision use and development pressures on rural land.
AgResearch Ltd	116	127 Policy 3.8.3 Managing fragmentation of rural land	Amend as follows: "Policy 3.8.3 Managing fragmentation, use and development of rural land Manage subdivision, use and development of rural land, to: as sought in the submission including functional need to locate in rural areas	Support in part	There should be the ability for rural related activities to locate in rural areas where there is a functional need to locate in the rural area.

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Dunedin City Council	156	127 Policy 3.8.3 Managing fragmentation of rural land	Delete 3.8.3(a)(ii) and (iii). • Replace with: "Manage subdivision and development in future urban development areas to ensure activities do not reduce the future efficient and appropriate development of these areas". • Move (c) to sit within Policy 3.8.1(c). • Delete (d).	Oppose	The changes sought by the submitter change the focus from retaining land for rural production and are not supported. Deletion of clause d) is not supported as there are instances where subdivision has led to growers losing water to urban use.
Royalburn Farming Co Ltd	102	128 Objective 3.9 Hazardous substances and waste materials do not harm human health or the quality of the environment in Otago	Amend as follows: "Hazardous substances and waste materials do not <u>pose a significant risk harm</u> human health or the quality of the environment in Otago".	Support	A focus on risk is appropriate for management of hazardous substances and is consistent with HSNO.
Straterra	151	290 Introduction to Objective 3.9	Support [explanation to Objective 3.9 - page 70] subject to the following amendment [at the end of the paragraph]: " <u>It is noted that hazardous substances are currently comprehensively regulated under the Hazardous Substances and New Organisms Act 1996</u> "	Support	The section needs to address the relationship to HSNO and the extent to which additional regulation of hazardous substances under the RMA is required.
Fonterra Co-operative Group Ltd	99	131 Policy 3.9.2 Managing the use, storage and disposal of hazardous substances and the storage and disposal of waste materials	• Delete clause a). • Amend Clause f)i. to read: "i Authorised facilities for hazardous substance <u>use, storage, treatment or disposal, or</u> ".	Support	There can be reverse sensitivity effects from the use and storage of hazardous substances. Matter a) is provided for in HSNO so does not need to be duplicated in the PRPS
Z Energy, BOP Oil and Mobil Oil Ltd	128	131 Policy 3.9.2 Managing the use, storage and disposal of hazardous substances and the storage and disposal of waste materials	Amend Policy 3.9.2 as follows" "Managing the use <u>and storage and disposal</u> of hazardous substances, and the storage and disposal of waste materials . Manage the use <u>and storage and disposal</u> of hazardous substances, and the storage and disposal of waste materials, <u>having regard to the sensitivity of the receiving environment and recognising the social and economic benefits such activities provide, to avoid accidental spillage or release of these substances and materials, by:</u> as set out in submission	Support in part	Recognition of the receiving environment is important in terms of assessing potential effects of the activity. Matter a) is provided for in HSNO so does not need to be duplicated in the PRPS.
Straterra	151	131 Policy 3.9.2 Managing the use, storage and disposal of hazardous substances and the storage and disposal of waste materials	Delete Policy 3.9.2. to avoid unnecessary and counterproductive regulatory duplication with HSNO Act	Support in part	The RMA requires that hazardous substances are managed by regional and district councils but the policy section needs to address the relationship to HSNO and the extent to which additional regulation of hazardous substances under the RMA is required.
The Fertiliser Assoc of NZ	110	133 Policy 3.9.4 Managing the use of contaminated land	Amend as follows: "Policy 3.9.4 Managing the use of contaminated land Manage the use of contaminated land, to protect people and the environment from adverse effects, by: ... b) Where there is contamination contaminated land:"	Support	'Contaminated land' is defined in the RMA so it is clearer to use the defined term.

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Dunedin City Council	156	133 Policy 3.9.4 Managing the use of contaminated land	Consider if this policy is necessary. <ul style="list-style-type: none"> • If the policy is considered necessary, amend the policy to separate the purposes of addressing effects on human health and the environment, and recognise the NES e.g.: "Manage the use of contaminated land, to protect <u>human health</u> people and the environment from adverse effects, by: <u>through the application of the NES for Assessing and Managing Contaminants in Soil to Protect Human Health</u>" 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.</u> Considering the need for ongoing monitoring of contaminant levels and associated environmental risks." 	Support in part	It is appropriate that the NES for Assessing and Managing Contaminants in Soil to Protect Human Health is the basis of the policy response for managing the use of contaminated land.
The Fertiliser Assoc of NZ	110	135 Policy 3.9.6 Encouraging use of best management practices for hazardous substance use	Amend as follows: "Policy 3.9.6 Encouraging use of best management practices for hazardous substance use Encourage the use of best management practices to <u>Prevent avoid, remedy</u> or mitigate adverse effects of the use of hazardous substances on the environment, <u>including reducing their use and on the health and safety of people.</u> "	Support	Use of best management practices is an appropriate tool for management of hazardous substances. An example is NZS8409:2004 Management of Agrichemicals.
Dunedin City Council	156	136 Encouraging services of hazardous substances collection, recycling and disposal	Amend the policy as follows: " Encourage <u>Promote and facilitate</u> the establishment of hazardous substance collection...across the region"	Support	The more active promotion and facilitation of collection, recycling and disposal services is supported. An example is the AgRecovery programme.
Environmental Defence Society	127	137 Chapter B4 General requests	Include additional policies addressing / providing a course of action for specific freshwater issues other than reduction of catchment yield.	Oppose in part	Implementing the NPSFM should be addressed through the Regional Plan
Federated Farmers of NZ	115	291 Outcome 4 and Introduction	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 <u>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</u>	Support in part	The more positive wording is supported.
Royalburn Farming Co Ltd	102	140 Issue 4.3 Conflicts between uses	Amend as follows: " Sometimes, existing businesses may be placed at risk by pressure to change activities are susceptible to reverse sensitivity effects, particularly when land use changes to activities that may compete or conflict, creating reverse sensitivities. "	Support in part	The reworded issue better captures the intent and reality of the situation.

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Forest and Bird NZ	98	154 Policy suite 4.3 Sufficient land is managed and protected for economic production	Remove policies relating to rural land use from this chapter and embrace under a new Objective that reflects the requirements for sustainable management, protecting the life supporting capacity of productive rural ecosystems.	Oppose in part	It is important that there is a policy framework to enable rural production activities, which needs to meet the sustainable management requirements of the RMA.
Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga	154	154 Policy suite 4.3 Sufficient land is managed and protected for economic production	Add additional policies to: "Minimise the effects of existing pests and avoid the establishment of new pest species."	Support	Horticulture NZ seeks that the establishment of unwanted organisms is avoided.
Egg Producers Federation of NZ	29	155 Policy 4.3.1 Managing for rural activities	Replace "soil" by "land" throughout the Policy	Support	The focus should be on the attributes of 'land' – of which soil is one attribute. A production system requires more than 'soil'.
Egg Producers Federation of NZ	29	155 Policy 4.3.1 Managing for rural activities	Add the following sub-clause to Policy 4.3.1: " f) <u>Restricting new development to appropriate locations to minimise conflict between incompatible land uses.</u> "	Support	Reverse sensitivity effects can compromise rural production activities and is a significant issue
McKeague Consultancy Ltd	89	155 Policy 4.3.1 Managing for rural activities	Correct the inconsistency between Policy 2.2.14 and Policy 4.3.1(b), by: • referring to "highly valued soils as outlined in Policy 2.2.14"; or • including the full list of criteria contained in Policy 2.2.14.	Support in part	Reference to 'highly valued' is supported but the focus should be on 'land' rather than 'soil'.
Fonterra Co-operative Group Ltd	99	155 Policy 4.3.1 Managing for rural activities	Amend Policy 4.3.1 clause a) to read: "a) Enabling primary production farming activities and other rural activities that support the rural economy; and)".	Support	The use of primary production is appropriate as 'production activities' is defined in the RMA. Farming implies pastoral land uses.
Dunedin City Council	156	155 Policy 4.3.1 Managing for rural activities	• Amend (b) to refer to "highly versatile soils".	Oppose	Horticulture NZ seeks that the term 'highly valued' land is used as it encompasses a wider range of land than limiting it to 'highly versatile soils.'
Rayonier Matariki Forests Ltd	84	162 Policy Suite 4.4 Otago's communities can make the most of the natural and built resources available to them	Include new policy on the need to use resources efficiently to enable economic activity and social wellbeing and which will achieve Objective 4.4.	Support	The approach would support efficient use of land
Otago Water Resource Users Group	121	162 Policy Suite 4.4 Otago's communities can make the most of the natural and built resources available to them	Include the following new policy ahead of the existing policy 4.4.1: "4.4.1A <u>Managing water for consumptive use</u> <u>When managing water:</u> a) <u>Recognise that the consumptive uses of Otago's water require sufficient quantities of quality water; and</u> b) <u>Recognise that significant historic investment reliant on water availability require sufficient quantities of quality water.</u> "	Support in part	The matters identified are important considerations for water allocation and use.
Fonterra Co-operative Group Ltd	99	163 Policy 4.4.1 Ensuring efficient water allocation and use	Retain Policy 4.4.1 subject to an additional clause to read: "e) <u>Recognising and providing for the continued operation and expansion of regionally significant industry and primary production activities.</u> "	Support	Recognition of primary production activities is supported.

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
McKeague Consultancy Ltd	89	163 Policy 4.4.1 Ensuring efficient water allocation and use	Amend (b) by replacing "requiring" with "give preference to..." <ul style="list-style-type: none"> Amend (c) to: "Encouraging collective coordination and collaborative catchment management". Provide clarity within the RPS as to how competing values and uses should be evaluated and weighed against each other 	Support in part	Clarity as to how competing values and uses may be evaluated would provide direction to water users but priorities should be set through the regional plan.
Federated Farmers of NZ	115	163 Policy 4.4.1 Ensuring efficient water allocation and use	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 appropriate allowance for reasonable variability in use between practices and seasons, and b) Requiring the development or upgrade of infrastructure that increases use efficiency, where economically feasible,	Support in part	Recognition of variability because of use, such as rotational growing systems is supported.
Forest and Bird NZ	98	163 Policy 4.4.1 Ensuring efficient water allocation and use	Amend d) to read: "(d) Enable small scale on farm water harvesting and storage to reduce pressure on water bodies during periods of low flows.	Oppose	Water storage and harvesting should not be limited to small scale on-farm water. The issue is that the adverse effects of the activity, regardless of scale, are avoided remedied or mitigated.
Federated Farmers of NZ	115	301 Introduction to Objective 4.5	Amend narrative under Objective 4.5 as set out in submission	Support	The more positive wording is supported.
Fonterra Co-operative Group Ltd	99	168 Policy 4.5.1 Avoiding objectionable discharges	Delete Policy 4.5.1 and replace with new policies dealing separately with discharges to land, water and air. The following suggested policies are not exhaustive and only set out the key parts of policy framework that will, at least in part, address the core aspects the concerns raised: Changes as set out in the submission	Support in part	The policy approach sought would be clearer.
Ospri	68	168 Policy 4.5.1 Avoiding objectionable discharges	Delete 4.5.1(b)	Support in part	The use of agrichemicals would be difficult under the proposed policy. It is recognised that care needs to be taken with their use but the policy seeks to 'avoid' the discharges.
Z Energy, BOP Oil and Mobil Oil Ltd	128	168 Policy 4.5.1 Avoiding objectionable discharges	Amend Policy 4.5.1 to ensure that the avoidance policy does not have unintended perverse consequences, for instance requiring the avoidance of emissions from vehicles. This could be achieved by amending Policy 4.5.1 as follows: " Avoid discharges that are objectionable or offensive, noxious or dangerous, having regard to the sensitivity of the receiving environment, to takata whenua and the wider community	Support in part	Recognition of the receiving environment is important in terms of assessing potential effects of the activity.
Dunedin City Council	156	168 Policy 4.5.1 Avoiding objectionable discharges	Delete Policy 4.5.1	Support in part	It is recognised that there are issues with Policy 4.5.1, in particular the use of agrichemicals, however the alternative approaches sought by a number of submitters may address the issues identified.
Otago and Central South Island Fish and Game Councils	118	171 Policy 4.5.4 Minimising soil erosion	Amend as follows: "Minimise soil erosion resulting from activities, by: ... d) Encouraging activities that enhance soil retention; and e) Buffering land from water."	Oppose	It is not clear what is intended by 'buffering land from water' but the approach should be to ensure that the potential for sediment to reach water is managed not promotion of specific methods through the PRPS.

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Otago Peninsula Biodiversity Group	40	172 Policy 4.5.5 Controlling the introduction and spread of pest plants and animals	Strongly support this policy. • Insert an additional sub-policy requiring specific plant and animal pest species to be identified in all planning documents that are subordinate to this RPS.	Support in part Oppose in part	It is not possible to include unwanted organisms that are not yet present in NZ in planning documents.
Fertiliser Assoc of NZ	110	177 Roles and responsibilities	Amend to replace prevention with avoidance and remediation	Support	The wording is better aligned to the RMA
Z Energy, BOP Oil and Mobil Oil Ltd	128	177 Roles and responsibilities	Expand on the roles and responsibilities of regional and district authorities, particularly relating to hazardous substances and contaminated land, to clearly distinguish the roles of each and to avoid conflict and/or duplication with other legislation and in particular have regard to the Guidance from MfE on hazardous substances. For example, in relation to the function of city and district councils, this could be achieved with wording along the following lines: "City and district councils will: Specify objectives, policies and methods for the control of the use of land for: a) ...; b) The prevention or mitigation of the adverse effects of the storage, use, transport or disposal of hazardous substances on the environment outside of the beds of rivers, lakes and wetlands or the coastal marine area, <u>noting that that the inclusion of hazardous substance controls in plans should be the exception rather than the rule and included only when a rigorous s32 analysis shows that these controls are justified</u> ;	Support	The PRPS should not require district plans to duplicate HSNO requirements unless there is a clear resource management issue.
Federated Farmers of NZ	115	181 Method 1.2 Collaborating with Kai Tahu for value identification	Amend as follows: "1.2.2 Identify and protect the values that contribute to their significance; ...	Support	Collaboration is supported, but it should not immediately imply protection.
Otago Water Users Group	121	183 Method 1.4 Delegating functions to Kai Tahu	Amend Method 1.4.1 as follows: "1.4.1 Delegate and transfer RMA plan administration functions to an iwi authority, where <u>this is appropriate</u> and provides an efficient and effective service."	Support	For the reasons given by the submitter
Otago Water Users Group	121	186 Method 2.2 Establishing process to address cross boundary issues	Amend Method 2.2.3 as follows: "2.2.3 Delegate or transfer RMA functions, where <u>this is appropriate and</u> provides an efficient and effective service, from..."	Support	For the reasons given by the submitter
Fonterra Co-operative Group Ltd	99	187 Method 2.3 Regional rule for extinguishing existing user rights.	Delete Method 2.3, or alternatively, identify the criteria and thresholds that will be used to determine where the approach might be applied.	Support	The method presents uncertainty to resource users.
Fonterra Co-operative Group Ltd	99	188 Method 3 Regional Plans	Amend Method 3 as set out in submission	Support in part	The method would implement the policy changes that the submitter seeks on the PRPS, including implementing the NPSFM.
AgResearch Ltd	116	189 Method 3.1 Developing Regional Plans	Delete method 3.1.3	Support	The document referred to was developed for purposes other than use in developing regional plans

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Ballance Agri Nutrients Ltd	141	189 Method 3.1 Developing Regional Plans	Amend Method 3 as follows: 3.1.6 <u>Regional Plans will establish freshwater management units and associated freshwater objectives in accordance with the National Policy Statement for Freshwater Management 2014</u>	Support	The method would implement the NPSFM through regional plans.
Fonterra Co-operative Group Ltd	99	192 Method 4 City and District Plans	Amend Method 4 as set out in submission	Support in part	The method would implement the policy changes that the submitter seeks on the PRPS. However the inclusion of 'highly versatile soils' is not supported
AgResearch Ltd	116	192 Method 4 City and District Plans	Add new method: "City or district plans may implement Policies 2.1.5, <u>2.2.15</u> , 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	Support in part	The new method would implement policies relating to fragmentation of rural land and reverse sensitivity.
AgResearch Ltd	116	193 Method 4.1 Developing District Plans	• Amend Method 4.1.12 as follows: "4.1.12 City or district plans may implement Policies <u>2.2.15</u> , 3.8.1, 3.8.2 and <u>3.8.3</u> by: a. Establishing urban growth boundaries where required to manage pressure for urban development <u>while avoiding high value soils and reverse sensitivity effects on rural production activities (unless there is no other suitable land available adjacent to existing urban areas.</u> "	Support in part	The method would implement policies relating to fragmentation of rural land and reverse sensitivity.
Aurora Energy Ltd	76	193 Method 4.1 Developing District Plans	Insert new method <u>Method 4 - 4.1.13</u> <u>City or district plans will implement Policy 3.4.2 (e) and 3.5.3 by:</u> <u>i. identifying Regionally Significant and Critical Infrastructure corridors on the Planning maps; and</u> <u>ii. include provisions managing land use activities within these corridors to address potential reverse sensitivity effects."</u>	Oppose	Horticulture NZ supports corridors for the National Grid which gives effect to the NPSET but not for other distribution networks as the Board of Inquiry specifically decided to not include such networks in the NPSET.
Dunedin City Council	156	194 Method 4.2 Implementing district plans	Amend [Method 4.2.4] as follows: "City or District Councils will implement Policies <u>4.3.1</u> , <u>4.3.2</u> , 3.8.1 and 3.8.2 by <u>preparing or requiring developers to prepare structure plans for large scale land use changes subdivisions</u>	Support in part	It is inappropriate to require structure plans for rural land use changes.
Egg Producers Federation of NZ	29	198 Method 6.1 Identification of important resources	Replace "soil" by "land" throughout the Policy	Support	The focus should be on the attributes of 'land' – of which soil is one attribute. A production system requires more than 'soil'.
Central Otago District Council	37	199 Method 6.2 Research	Amend Method 6.2.1 as follows: • 6.2.1 d) i) - The inventory and mapping of Otago's soil resources <u>and their suitability for rural land use intensification</u> . • 6.2.1 d) ii) - The location and extent of <u>high-class and versatile</u> -highly versatile soil in Otago. • 6.2.1 h) - Retain Method 6.2.1 h) • 6.2.1 j) - Retain Method 6.2.1 j) Amend Methods 6.2.2 & 6.2.3 as follows: "Regional, city and district councils <u>will may</u> :"	Oppose in part	The focus should be on 'highly valued land' for primary production, not necessarily for rural land use intensification.

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
AgResearch Ltd	116	199 Method 6.2 Research	Amend Method 6.2.1(d)(ii) as follows: "d) Investigate and provide guidance on: i. The inventory and mapping of Otago's soil resources; ii. The location and extent of <u>highly valued soils</u> and highly class and versatile soils in Otago; ...	Oppose in part Support in part	The focus should be on highly valued land for primary production.
Balance Agri Nutrients Ltd	141	220 Methods 11.1.2 and 11.1.3 Promotion by regional, city and district councils	Amend as follows: "11.1.3 Regional, city and district councils may: ... d. <u>Promote the use of industry best management practices and compliance with the HASNO Act and supporting regulations, to prevent or mitigate adverse effects of the use of hazardous substances on the environment, including reducing their use wherever practicable.</u> e. <u>In circumstances where no industry best practice currently exists, p</u> Promote the development and adoption of best practice guidelines for the use and management of hazardous substances, <u>and a reduction in hazardous substance use including their use wherever practicable</u>	Support	The use of best management practices is supported, especially in relation to hazardous substances.
Egg Producers Federation of NZ	29	232 AER 2.4 The quality of Otago's soils is maintained or enhanced	Amend the 1st indicator as follows: " There is (...) of Otago's soils <u>highly valued land.</u> " • Replace "soil" with "land" throughout the remaining statements of AER 2.4.		The focus should be on the attributes of 'land' – of which soil is one attribute. A production system requires more than 'soil'.
Egg Producers Federation of NZ	29	249 Glossary	Amend as follows: "Highly valued soils <u>land - Land</u> soils valued for their its significance, including: a. Versatility for primary production, such as highly versatile soils-land ; etc." and "Highly versatile soils land - Land classified as Land Use Capability I or II in the New Zealand Land Resource Inventory"	Support in part Oppose in part	The focus should be on the attributes of 'land' – of which soil is one attribute. A production system requires more than 'soil'. But versatility is only one measure of highly valued land.
Guardians of Lake Wanaka and Guardians of Lake Hawea	73	249 Glossary	Include a definition of values using the RMA definition of intrinsic values	Oppose in part	Clarification regarding values is supported but it should be broad based and not just based on intrinsic values as these are only one set of values.
Contact Energy Ltd	74	249 Glossary	Amend the definition of reverse sensitivity	Oppose	Horticulture NZ supports the definition of reverse sensitivity in the PRPS.
Aurora Energy Ltd	76	249 Glossary	Insert a definition of critical infrastructure	Oppose	The PRPS does not use the term 'critical infrastructure' and Horticulture NZ does not support its inclusion.
Aurora Energy Ltd	76	249 Glossary	Insert a definition of regionally significant infrastructure	Oppose in part	A definition would clarify what is regarded as 'regionally significant infrastructure' but it should not include local electricity distribution networks.
Rayonier Matariki Forests Ltd	84	249 Glossary	Add a definition of primary production	Support	A definition would provide clarity.
Transpower NZ Ltd	97	249 Glossary	Amend the definition of reverse sensitivity	Oppose	Horticulture NZ supports the definition of reverse sensitivity in the PRPS.

Submitter	Sub No.	Plan Provision	Decision requested by submitter	Support/ Oppose	Reason
Fonterra Co-operative Group Ltd	99	249 Glossary	Add a definition of primary production	Support in part	A definition would provide clarity but the definition sought by Submitter 84 is clearer.
Royalburn Farming Co Ltd	102	249 Glossary	Include a Definition regionally significant soil resource	Oppose in part	It is unclear the intent of the definition
Otago and Central South Island Fish and Game Councils	118	249 Glossary	Include a definition of pest	Oppose in part	The definition should not preclude unwanted organisms that are not in a pest management plan as they are currently not in the region or NZ.
Z Energy, BOP Oil and Mobil Oil Ltd	128	249 Glossary	Amend the definition of reverse sensitivity	Oppose	Horticulture NZ supports the definition of reverse sensitivity in the PRPS.
Z Energy, BOP Oil and Mobil Oil Ltd	128	249 Glossary	Include a Definition regionally significant infrastructure	Oppose in part support in part	A definition for 'regionally significant infrastructure' may be appropriate but there needs to be consultation as to what should be included.
Ballance Agri Nutrients Ltd	141	249 Glossary	Amend the definition of highly valued soils	Oppose in part	The definition should be for highly valued land.

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**FURTHER SUBMISSION TO THE PROPOSED REGIONAL POLICY
STATEMENT FOR OTAGO**

TO: Freepost ORC 497
Otago Regional Council
Private Bag 1954
DUNEDIN

BY E-MAIL: rps@orc.govt.nz

FURTHER SUBMISSION ON: Proposed Regional Policy Statement for Otago

NAME OF FURTHER SUBMITTER: Pioneer Generation Limited

ADDRESS FOR SERVICE: Pioneer Generation Limited
Attention: Mr Peter Mulvihill

Phone: (03) 440 0022 or 027 226 0601

Email: peter.mulvihill@pgl.co.nz

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1.0 INTRODUCTION

Pioneer Generation Limited (hereafter referred to as 'Pioneer') made submissions to the proposed Regional Policy Statement for Otago (hereafter referred to as the 'pORPS') in July 2015. Pioneer's submissions (Council Submitter Number 142) covered a range of topic areas relating to the Company's interests within the Otago Region. This information is not re-stated here.

Pioneer has an interest in the various provisions and submission points that is greater than that of the general public.

Pioneer wishes to be heard in support of its Submissions and Further Submissions. If others make a similar submission Pioneer would consider presenting a joint case with them at any hearing.

Pioneer cannot gain an advantage in trade competition through this submission.

Pioneer's further submissions and the reasons for the same are set out within the following table, entitled 'Further Submissions to the proposed Regional Policy Statement for Otago.'

Signature:



Peter Mulvihill
General Manager – Project Development and Delivery
Pioneer Generation Limited

Date: 25th of September 2015

2.0 FURTHER SUBMISSIONS TO THE PROPOSED REGIONAL POLICY STATEMENT FOR OTAGO

Submitter Name / Submitter Number	Submission Number	Relevant Provision / Submission Point	Support / Oppose	Reasons	Relief Sought By Pioneer
Contact Energy Limited	74	<p>Policy 2.1.1 Contact Energy Limited ('Contact') has requested that Policy 2.1.1 be amended as follows:</p> <ul style="list-style-type: none"> a) In c), confirm what is meant by 'outstanding' by providing a cross reference to Policy 2.2.12; b) In d), amend to read "<u>Protect <i>current migratory patterns</i></u>"; c) In f), amend to read "<u>Maintain good water quality, including the coastal marine area, or enhance it where it has been degraded, acknowledging that naturally occurring processes such as floods intermittently lower water quality</u>". d) In h), amend to read: "<u>Maintain or enhance the natural functioning of rivers, lakes, and wetlands, their riparian margins, and aquifers, other than those rivers modified by hydro electric generation use or other infrastructure</u>". e) In m), amend to read: "<u>Maintain the existing aesthetic and landscape values of...</u>" f) Delete n); g) Include new q) as follows: "<u>Provide for and protect hydro electric power generation</u>" 	Support in part	<p>The reasons for Pioneer's support include:</p> <p>Pioneer considers that the amendments requested by Contact generally assist in the clarification of how freshwater values are to be recognised and, in turn, managed. In particular, Pioneer supports the suggested amendment to provision 2.1.1h), which recognises that the functioning of some rivers, lakes, wetlands and their margins has, in some instances, been lawfully modified (via resource consent) by the use of hydroelectric power generation and other infrastructure. Pioneer agrees that it is not appropriate to 'maintain or enhance' the natural functioning of all freshwater bodies.</p> <p>Further, Pioneer considers that Contact's requested amendment to Policy 2.1.1f) is appropriate as it seeks to clarify that water quality may not always be able to be maintained due to the influence of natural processes, such as flooding, that cannot be readily controlled.</p>	<p>That the amendments suggested by Contact to Policy 2.1.1 are accepted in part, subject to the additional amendments requested by Pioneer, as per it's primary submission to Policy 2.1.1 and as set out below:</p> <p>Policy 2.1.1 – Managing for freshwater values <i>Recognise freshwater values, and manage freshwater, to:</i></p> <ul style="list-style-type: none"> a) <i>Support healthy ecosystems in all Otago aquifers, and rivers, lakes, wetlands, and their margins; and</i> b) <i>Retain the range and extent of habitats provided by freshwater, <u>as appropriate</u>; and</i> c) <i>Protect <u>the values of</u> outstanding water bodies and wetlands; and</i> d) <i>Protect <u>current</u> migratory patterns of freshwater species, unless detrimental to indigenous biodiversity; and</i> e) <i>Avoid aquifer compaction, and seawater intrusion in aquifers; and</i> f) <i><u>In accordance with established freshwater objectives, maintain good water quality, including in the coastal marine area, or enhance it where it has been degraded acknowledging that naturally occurring processes such as floods intermittently lower water quality; and</u></i> g) <i>Maintain or enhance coastal values</i>

Submitter Name / Submitter Number	Submission Number	Relevant Provision / Submission Point	Support / Oppose	Reasons	Relief Sought By Pioneer
				<p>In addition, Pioneer considers that the use of the word 'current' in Policy 2.1.1d) and 'existing' in Policy 2.1.1m) sought by Contact assists in clarifying that protection applies to present values only (and not past or future values), which again, is appropriate.</p> <p>Finally, while supportive of Contact's request to provide for and protect hydroelectric power generation, Pioneer has requested amendments to Policy 2.1.1 within its primary submission, which, whilst not specifically referring to hydroelectric power generation, are intended to encompass the same.</p>	<p><i>supported by freshwater values; and</i></p> <p><i>h) Maintain or enhance the natural functioning of rivers, lakes, and wetlands, their riparian margins, and aquifers <u>other than those rivers modified by hydro electric generation use or other infrastructure</u>; and</i></p> <p><i>i) Retain the quality and reliability of existing drinking water supplies; and</i></p> <p><i>j) Protect Kai Tahu values; and</i></p> <p><i>k) Provide for other cultural values; and</i></p> <p><i>l) Protect <u>significant—important</u> recreation values; and</i></p> <p><i>m) Maintain the <u>existing</u> aesthetic and landscape values of rivers, lakes, and wetlands; and</i></p> <p><i>n) Avoid the adverse effects of pest species, prevent their introduction and reduce their spread; and</i></p> <p><i>o) Mitigate the adverse effects of natural hazards, including flooding and erosion; and</i></p> <p><i>p) Maintain the ability of existing infrastructure to operate within their design parameters <u>while providing for the maintenance, upgrading and, as appropriate, the enhancement of the same</u>; and</i></p> <p><i>q) <u>Maintain the ability of water users to provide for the economic and social wellbeing and the health and safety of the community.</u></i></p>

Submitter Name / Submitter Number	Submission Number	Relevant Provision / Submission Point	Support / Oppose	Reasons	Relief Sought By Pioneer
Contact	74	<p>Policy 2.1.2 Contact has requested that Policy 2.1.2 be amended as follows:</p> <ul style="list-style-type: none"> a) In a), amend to read: <i>“Protect or restore their <u>existing</u> natural functioning”;</i> b) In b), insert a cross reference to Policy 2.2.12; c) In c) amend to read: <i>“Maintain good water quality, or enhance it where it has been degraded, <u>acknowledging that naturally occurring processes such as floods intermittently lower water quality</u>”;</i> d) In f), amend to read: <i>“Maintain or enhance <u>existing</u> natural character”;</i> e) In i), amend to read: <i>“Maintain <u>existing</u> aesthetic and amenity values”;</i> f) Delete j); g) Include new m) as follows: <i>“Maintain the ability of <u>existing infrastructure to operate within their design parameters</u>”.</i> 	Support in part	<p>The reasons for Pioneer's support include:</p> <p>Further to those reasons provided in response to Pioneer's further submission on Contact's submission to Policy 2.1.1 above, Pioneer considers that, together with those amendments that Pioneer requested in its primary submission to Policy 2.1.2, the amendments requested by Contact generally assist in clarifying how the values associated with the beds of rivers and lakes, wetlands and their margins are to be recognised and, in turn, managed.</p>	<p>That the amendments suggested by Contact to Policy 2.1.1 are accepted in part, subject to the additional amendments requested by Pioneer, as per its primary submission to Policy 2.1.1 and as set out below:</p> <p>Policy 2.1.2 – Managing for values of beds of rivers and lakes, wetlands, and their margins</p> <p><i>Recognise the values of beds of rivers and lakes, wetlands, and their margins, and manage them to:</i></p> <ul style="list-style-type: none"> a) Protect or restore their natural <i>Maintain their functioning in order to provide for key values; and</i> b) <i>Protect the values of outstanding water bodies and wetlands; and</i> c) In accordance with established freshwater objectives, maintain <i>good water quality, or enhance it where it has been degraded <u>acknowledging that naturally occurring processes such as floods intermittently lower water quality</u>; and</i> d) <i>Maintain ecosystem health and indigenous biodiversity; and</i> e) <i>Retain the range and extent of habitats supported, <u>as appropriate</u>; and</i> f) <i>Maintain or enhance <u>existing</u> natural character; and</i> g) <i>Protect Kāi Tahu values; and</i> h) <i>Provide for other cultural values; and</i>

Submitter Name / Submitter Number	Submission Number	Relevant Provision / Submission Point	Support / Oppose	Reasons	Relief Sought By Pioneer
					<ul style="list-style-type: none"> i) <i>Maintain their <u>existing</u> aesthetic and amenity values; and</i> j) <i>Avoid the adverse effects of pest species, prevent their introduction and reduce their spread; and</i> k) <i>Mitigate the adverse effects of natural hazards, including flooding and erosion; and</i> l) <i>Maintain bank stability; and</i> m) <i><u>Maintain the ability to use the beds of lakes and rivers to provide for the economic and social wellbeing and the health and safety of the community.</u></i>
Contact	74	<p>Policy 2.2.2 Contact has requested that Policy 2.2.2 be amended as follows:</p> <p>a) Add a further method to Policy 2.2.2 (new f)) to protect and enhance values as follows: <i><u>"Offsetting where adverse effects cannot be avoided, remedied or mitigated and the activities causing those effects have a functional necessity to locate in the area of vegetation or habitat"</u></i>.</p>	Support in part	<p>The reasons for Pioneer's support include:</p> <p>Pioneer notes that Policy 2.2.2 provides for avoidance, remediation and mitigation of adverse effects on the values of significant indigenous vegetation and habitats of indigenous fauna. It is noted that other provisions, including Polices 4.5.7 and 4.5.8, which relate to indigenous biodiversity, also provide for offsetting in addition to avoidance, remediation and mitigation of adverse effects. Pioneer,</p>	<p>That the amendments suggested by Contact to Policy 2.2.2 are accepted in part, subject to the additional amendments requested by Pioneer, as per it's primary submission to Policy 2.2.2 and as set out below:</p> <p><i>Managing significant indigenous vegetation and significant habitats of indigenous fauna</i> <i>Protect and, <u>where appropriate</u>, enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna by:</i></p> <ul style="list-style-type: none"> a) <i>Avoiding adverse effects on those values that contribute to the area or habitat being significant; and</i> b) <i>Avoiding significant adverse effects on other</i>

Submitter Name / Submitter Number	Submission Number	Relevant Provision / Submission Point	Support / Oppose	Reasons	Relief Sought By Pioneer
				<p>therefore, considers it appropriate for Policy 2.2.2 to provide for offsetting also. In this respect Pioneer is concerned that the absence of a reference to 'offsetting' may be interpreted as offsetting not being available as a mitigation response in the context of Policy 2.2.2, particularly given that reference to 'offsetting' has been included in other policies within the pORPS.</p> <p>Pioneer notes that the National Policy Statement for Renewable Electricity Generation (Policy C2) has established that, when considering any residual effects of renewable electricity generation activities that cannot be avoided, remedied or mitigated, decision-makers shall have regard to offsetting measures or environmental compensation.</p> <p>Further, case law and current biodiversity best practice has established a basis for how various activities might seek to address remaining residual environmental effects that cannot otherwise be avoided, remedied or mitigated. As such Pioneer considers the</p>	<p><i>values of the area or habitat; and</i></p> <p>c) <i>Assessing the significance of the adverse effects on those values as detailed in Schedule 3; and</i></p> <p>d) <i>Remediating, when adverse effects cannot be avoided; and</i></p> <p>e) <i>Mitigating where adverse effects cannot be avoided or remedied; and</i></p> <p>f) <u><i>Offsetting where adverse effects cannot be avoided, remedied or mitigated and the activities causing those effects have a functional necessity to locate in the area of vegetation or habitat; and</i></u></p> <p>g) <i>Encouraging enhancement of those areas and values.</i></p>

Submitter Name / Submitter Number	Submission Number	Relevant Provision / Submission Point	Support / Oppose	Reasons	Relief Sought By Pioneer
				amendment to Policy 2.2.2 requested by Contact to be both appropriate, to provide consistency with other provisions within the pORPS, and to be in keeping with current Resource Management practice.	
Contact	74	<p>Policy 2.2.4 Contact has requested that Policy 2.2.4a) be amended as follows:</p> <p>a) <i>“Avoid <u>significant</u> adverse effects on those values which contribute to the significance of <u>make the natural feature, landscape or seascape outstanding</u>”;</i></p> <p>b) Delete Policy 2.2.4b).</p>	Support	<p>The reasons for Pioneer’s support include:</p> <p>Pioneer considers that Policy 2.2.4a) is overly restrictive and goes beyond the requirements of Part 2 of the Resource Management Act 1991. Policy 2.2.4a) does not ‘allow’ for important physical resources, such as hydroelectric power generation schemes, which can be located in areas of outstanding value.</p> <p>Further, while it is implied that avoidance of adverse effects is intended to apply to outstanding natural features, landscapes and seascapes, Policy 2.2.4a) as proposed, does not specifically state this. Pioneer considers specific reference to the term ‘outstanding’ within Policy 2.2.4a)</p>	That the amendments suggested by Contact to Policy 2.2.4 are accepted.

Submitter Name / Submitter Number	Submission Number	Relevant Provision / Submission Point	Support / Oppose	Reasons	Relief Sought By Pioneer
				<p>will assist in making the policy clearer.</p> <p>Finally, it is unclear what 'other values' is intended to cover, within Policy 2.2.4b), as such, Pioneer considers it appropriate to delete this specific provision.</p>	
Trustpower Limited	85	<p>Policy 2.2.6 Trustpower Limited ('Trustpower') has requested that Policy 2.2.6 be deleted and rewritten to focus on the 'maintenance' of special amenity landscapes, as opposed to the protection or enhancement of the same.</p>	Support	<p>The reason's for Pioneer's support include:</p> <p>Pioneer considers Policy 2.2.6 to be overly restrictive. As proposed, the policy seeks to 'protect' amenity landscapes and highly valued natural features. Pioneer considers it more appropriate to 'maintain' such landscapes and features, given they are not deemed to be 'outstanding'.</p> <p>Further, as currently worded, Policy 2.2.6a) requires the 'avoidance' of significant adverse effects on those values that contribute to the special amenity of the landscape or high value of the natural feature. Again, Pioneer considers this to be overly restrictive and inappropriate, noting that the provision should also provide for</p>	That the relief sought by Trustpower to Policy 2.2.6 be accepted.

Submitter Name / Submitter Number	Submission Number	Relevant Provision / Submission Point	Support / Oppose	Reasons	Relief Sought By Pioneer
				'remediation and mitigation'.	
Trustpower	85	<p>Policy 3.4.1</p> <p>Trustpower has requested that an additional clause (new clause e)) be added to Policy 3.4.1 as follows:</p> <p><i>"Ensuring that land use and development does not result in adverse effects on the operation, use and development of infrastructure".</i></p>	Support	<p>The reason's for Pioneer's support include:</p> <p>Pioneer considers that it is important to ensure that land use development does not adversely impact upon the operation, use and development of existing infrastructure within the region. As such, Pioneer is concerned to ensure that the reverse sensitivity effects associated with new land use and development are taken into account.</p>	That the relief sought by Trustpower to include new clause e) within Policy 3.4.1 be accepted.
Trustpower	85	<p>Policy 3.4.2</p> <p>Trustpower has requested that Policy 3.4.2 be amended to seek to provide for the development of infrastructure where it appropriately manages adverse effects on the environment, and where the development will give rise to benefits on a local, regional or national basis.</p>	Support	<p>The reasons for Pioneer's support include:</p> <p>Pioneer supports Trustpower's suggested relief to Policy 3.4.2. As proposed, the policy seeks to manage infrastructure activities, rather than the effects that such activities may have on the environment. Pioneer considers that the management of infrastructure can be driven by imperatives outside of the context</p>	That the relief sought by Trustpower to Policy 3.4.2 be accepted.

Submitter Name / Submitter Number	Submission Number	Relevant Provision / Submission Point	Support / Oppose	Reasons	Relief Sought By Pioneer
				of the Resource Management Act. Pioneer, therefore, considers that it is appropriate that the Policy refer to the management of an activity's effects as opposed to the activity itself. This is particularly the case where the development will give rise to benefits on a local, regional or national basis.	
Trustpower	85	<p>Objective 3.5 Trustpower has requested that Objective 3.5 be redrafted as follows: <u><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></u></p>	Support	<p>The reasons for Pioneer's support include:</p> <p>As noted in response to Trustpower's submission on Policy 3.4.2, the management of infrastructure can be driven by imperatives outside of the context of the Resource Management Act. This includes commercial and economic imperatives. As such, Pioneer considers that the wording requested by Trustpower is appropriate and more consistent with both Part 2 of the Resource Management Act and both the Objective and Policy A of the National Policy Statement for Renewable Electricity Generation 2011.</p>	That the relief sought by Trustpower to Objective 3.5 be accepted.

Submitter Name / Submitter Number	Submission Number	Relevant Provision / Submission Point	Support / Oppose	Reasons	Relief Sought By Pioneer
Contact	74	<p>Policy 3.5.1</p> <p>Contact has noted that they support the intent of Policy 3.5.1, however they have requested minor amendment to Policy 3.5.1a) as follows:</p> <p><i>“Renewable electricity generation activities facilities where they supply the national electricity grid and/or local distribution network”.</i></p>	Support	<p>The reasons for Pioneer’s support include:</p> <p>The changes suggested by Contact are in keeping with the National Policy Statement for Renewable Electricity Generation 2011. In particular the ‘Interpretation’ provided within the same, which refers to renewable electricity generation ‘activities’ rather than ‘facilities’, and notes that electricity generated by such activities may be supplied to either the national grid, the local distribution network, or both.</p>	That the relief sought by Contact to Policy 3.5.1a) be accepted.
Trustpower	85	<p>Policy 4.5.2</p> <p>Trustpower has requested that Policy 4.5.2, which provides for an adaptive management approach to be applied, be retained as notified.</p>	Support	<p>The reasons for Pioneer’s support include:</p> <p>Pioneer considers that it is appropriate to recognise and enable the use of adaptive management regimes in dealing with adverse effects from particular activities.</p> <p>Pioneer notes that using an adaptive management approach can be particularly useful for large</p>	That the relief sought by Trustpower to retain Policy 4.5.2 as notified be accepted.

Submitter Name / Submitter Number	Submission Number	Relevant Provision / Submission Point	Support / Oppose	Reasons	Relief Sought By Pioneer
				<p>and complex projects such as hydroelectric power generation scheme proposals, which often require extensive baseline data to confirm the effects of the proposal and how these might be avoided, remedied or mitigated. An adaptive management regime provides a way of managing effects, where the nature and extent of those effects is uncertain and the outcome of methods to avoid, remedy or mitigate the same is also uncertain. It allows a resource consent to be granted without waiting on the science (to confirm effects, subject to appropriate monitoring provisions and management plans that seek to manage the effects of the activity in a flexible and responsive manner.</p>	

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Opus International
Consultants Ltd
Dunedin Office
Opus House, 197 Rattray Street
Private Bag 1913, Dunedin 9054
New Zealand

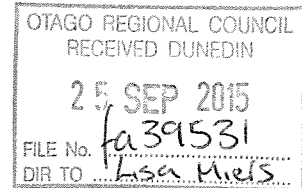
t: +64 3 471 5500
f: +64 3 474 8995
w: www.opus.co.nz

25 September 2015

Otago Regional Council
Private Bag 1913
DUNEDIN 1913

Attention: Ralph Henderson

6-CM326.00



Dear Ralph

**FURTHER SUBMISSION ON THE PROPOSED REGIONAL POLICY
STATEMENT FOR OTAGO 2015 - AIRWAYS CORPORATION OF NEW
ZEALAND LIMITED**

Please find enclosed a further submission from Airways Corporation of New Zealand Limited on the Proposed Regional Policy Statement for Otago 2015.

I would appreciate it if you could acknowledge receipt of this submission by email to shane.roberts@opus.co.nz.

Regards

Shane L Roberts
Work Group Leader - Property and Resource Management

Copy:

*Queenstown Airport Corporation
C/- Mitchell Partnerships
PO Box 489
Dunedin
Attention: Kirsty O'Sullivan*



FURTHER SUBMISSION ON THE PROPOSED REGIONAL POLICY STATEMENT FOR OTAGO

To: Otago Regional Council
Private Bag 1954
DUNEDIN 9054

From: Airways Corporation of New Zealand Limited
PO Box 294
WELLINGTON 6140

(Please note the different address for service)

Airways Corporation of New Zealand Limited (Airways) hereby makes a further submission on the Proposed Regional Policy Statement for Otago in accordance with Clause 8 of Schedule 1 of the Resource Management Act 1991.

The Role of Airways

Airways has principal responsibility for facilitating the safe movement of air traffic through New Zealand airspace. It is responsible for managing all domestic and international air traffic for one of the largest areas of airspace in the world – 34 million square kilometres. To perform this function Airways maintains an extensive air navigation network made up of a number of different navigation systems and facilities.

As such Airways:

- Represents a relevant aspect of the public interest, that being aircraft safety; and
- Has an interest in the proposed policy statement greater than the interest the general public having principal responsibility for facilitating the safe movement of air traffic through New Zealand airspace.

Further Submission in Support:

Airways further submission is set out in the table on the following page:

Name of Submitter	Provision	Submission Ref	Support or Oppose	Reasons
Queenstown Airport Corporation	Policy suite 2.1 – The values of natural resources are recognised, maintained or enhanced	30	Support	Airways agrees that current policies are insufficient to achieve Objective 2.1 as they only address natural values and not physical values.
Queenstown Airport Corporation	Policy 2.1.4 – Managing for Air Quality Values	34	Support (in part)	Airways agrees that the policy should recognise that visibility is an issue with respect to operations in and around an airport and that air discharges should be considered/ restricted in light of this.
Queenstown Airport Corporation	Policy 2.2.2 – Managing significant indigenous vegetation and significant habitats of indigenous fauna	44	Support	Airways agrees it is necessary to recognise and provide for circumstances where enhancing significant habitats of indigenous fauna (especially birdlife) may adversely impact on the safety of aircraft and passengers.
Queenstown Airport Corporation	Policy 2.2.4 – Managing outstanding natural features, landscapes and seascapes	46	Support	<p>Airways agrees that Clause (a) goes further than Part 2 of the Act. It leaves no room to provide for important physical resources such as infrastructure or other activities common in areas of outstanding value.</p> <p>Airways also agrees that the installation of obstacle lighting (or other navigation infrastructure for that matter) may be required in areas of outstanding natural landscape in response to changes in Civil Aviation requirements. Case law on meaning of "avoid" would potentially prohibit such activities.</p>
Queenstown Airport Corporation	Policy 2.3.5 - Applying an integrated management approach for airsheds	64	Support	Airways agrees that 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.
Queenstown Airport Corporation	Objective 3.4 - Good quality infrastructure and services meet community needs	96	Support	Airways agrees it is necessary to recognise specifically that certain infrastructure might be required in order to support the wider needs of New Zealand, rather than the needs of Otago as a region or local area only. Airways network of navigation installations is an example of this.

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

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



Signed..... Date..... 25 SEPTEMBER 2011.

Shane L Roberts
Consultant to:
Airways New Zealand Ltd

Address for Service:
Airways New Zealand
C/- Opus International Consultants
Private Bag 1913
DUNEDIN

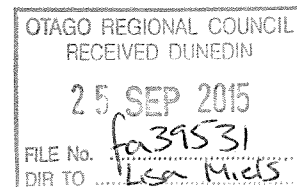
Attention: Shane L Roberts
Phone: 03 471 5565
Fax: 03 474 8995
Email: shane.roberts@opus.co.nz

1020

**FURTHER SUBMISSION ON THE PROPOSED OTAGO REGIONAL POLICY STATEMENT
UNDER CLAUSE EIGHT OF THE FIRST SCHEDULE TO
THE RESOURCE MANAGEMENT ACT 1991**

To: rps@orc.govt.nz

Otago Regional Council
Private Bag 1954
DUNEDIN 9054



Submitter: Darby Planning LP
C/- Boffa Miskell Ltd
PO Box 110
CHRISTCHURCH

Attention: Chris Ferguson, Planner
Phone: (03) 353 7568
Mobile: 021 907 773
Email: Chris.Ferguson@boffamiskell.co.nz

Darby Planning LP ("DPL") makes further submissions on the Proposed Otago Regional Policy Statement as set out in the **attached** document.

DPL confirms it is a person who is representing a relevant aspect of the public interest, and has an interest in the proposal that is greater than the interest the general public has (it is affected by the content of a submission).

DPL would like to be heard in support of its further submission.

If other persons make a similar further submission then DPL would consider presenting joint evidence at the time of the hearing.

A copy of this further submission has been served on the original submitters to which this further submission relates.

A handwritten signature in black ink, appearing to read "Chris Ferguson". The signature is written over a horizontal line.

Chris Ferguson

For and behalf of Darby Planning LP

25nd day of September 2015

0501

FURTHER SUBMISSIONS

The submission supported or opposed is:	The particular parts of the submissions supported or opposed are:	Support or Oppose	The reasons for support or opposition are:
Environmental Defence Society Incorporated (Submitter 127) PO Box 91736 Victoria Street West Auckland 1042.	Chapter B2 – General request for a new chapter focused on Outstanding Natural Features and Landscapes.	Oppose	<p>The RPS purpose is to provide an overview of the issues, policies, and methods to achieve integrated management for the whole region. The proposed provisions of the Proposed RPS provide an appropriate basis for management of Outstanding Natural Features and Landscapes (ONFL's) (subject to DPL's submissions on these provisions). A chapter focussed ONFL's is unnecessary. Further, the submission lacks sufficient particulars to understand the nature of the changes sought in response to this submission point.</p> <p>Identification of the specific activities which must be managed in ONFL's is more appropriately addressed in District Plans, than in the RPS.</p>
	Objective 2.2 Otago's significant and highly valued natural resources are identified, and protected or enhanced to maintain their distinctiveness	Oppose	This submissions seeks to develop specific objectives relating to ONFL's but fails to specify the wording and content of those proposed new objectives. The submission provides no clear relief to understand the impact of this change and is considered <i>ultra vires</i> .
	Policy 2.2.6 Managing special amenity landscapes and highly valued natural features	Oppose	The submitter seeks to include additional policies identifying what activities need to be managed in special amenity landscapes using examples from the Auckland Unitary Plan. Because the submission does not specify with any certainty how those examples would be applied it is impossible to determine its impact and meaning. This relief is considered <i>ultra vires</i> .
	Policy 4.5.8 Offsetting for indigenous biodiversity and new definition of "biodiversity offset"	Oppose	<p>DPL oppose the relief sought by this submitter to add "<i>additional; criteria to encapsulate all best practise offsetting principles.</i>" Without elaborating on what those principles are or how they are proposed to amend the policy, the outcomes sought from this submission are too vague and for this reason is considered <i>ultra vires</i>. In addition the reasons are suggesting changes that are also too narrow to maximise the benefits of offsetting.</p> <p>DPL are neutral in terms of the proposed new definition of "biodiversity offset" and are unclear how it will be applied to the proposed policies.</p>

The submission supported or opposed is:	The particular parts of the submissions supported or opposed are:	Support or Oppose	The reasons for support of opposition are:
Director-General of Conservation (Submitter 117) RMA Shared Services Department of Conservation Private Bag 4715 Christchurch Mail Centre 8140	Objective 3.2 Risk that natural hazards pose to Otago's communities are minimised	Oppose	DPL opposes changes to the objective sought by this submitter to reduce and not increase risk of natural hazards. The goal of minimising risk is considered a more appropriate basis to promote the purpose of the Act.
	Policy 3.2.6 Avoiding increased natural hazard risk	Oppose	DPL opposes the changes sought to this policy by the submitter to delete "significantly" from clause a). The effect of the change would be to avoid activities that increase risk. Given the interpretation by the Courts of the word avoid, this outcome is considered unnecessary measure to implement the objective of minimising natural hazard risk to Otago's communities.
	Policy 3.5.2 Managing adverse effects of infrastructure that has national or regional significance	Oppose	DPL oppose the changes sought by this submitter to Policy 3.5.2 e), requiring the use of offsetting. Biodiversity offsetting should be an optional tool to achieve sustainable management and should not be a prescribed method of promoting the purpose of the Act.
	Objective 4.5 Adverse effects of using and enjoying Otago's natural and built environment are minimised	Oppose	DPL oppose the proposed change to this policy to introduce "avoid" adverse effects. The impact of this does not sit well with the existing approach to "minimise" adverse effects and retaining both creates an inconsistency within the objective.
	Policy 4.5.7 and 4.5.8 and new Schedule XX - offsetting of indigenous biodiversity	Oppose	DPL oppose the changes sought to these provisions seeking to "require" biodiversity offsetting. Biodiversity offsetting should be an optional tool to achieve sustainable management and should not be a prescribed method of promoting the purpose of the Act.
Forest and Bird NZ (Submitter 98) PO Box 6230 DUNEDIN	Policy 2.1.2 – add new Policy	Oppose	DPL oppose the wording of the new policy suggested by the submitter to "Protect recreational use and access to the margins of Otago's water bodies". The proposed wording exceeds the statutory direction under s.6(d) for the maintenance and enhancement of public access.
	Policy 2.1.6 Managing for ecosystem and indigenous biodiversity values	Oppose	The proposed amendment to the introductory text to this policy establish a protection based framework that does not enable a balanced approach to be taken to the management of the effects of activities on ecosystems and indigenous biodiversity.

The submission supported or opposed is:	The particular parts of the submissions supported or opposed are:	Support or Oppose	The reasons for support of opposition are:
	New Policy – Fragmentation of indigenous ecosystems	Oppose	DPL oppose this new policy proposed by the submitter on that basis that it establishes a very high benchmark by seeking to avoid fragmentation. A balanced approach is considered more appropriate to “manage” or to “avoid, remedy or mitigate” fragmentation of indigenous ecosystems.
	New Policy – Biodiversity	Oppose	DPL oppose the introduction of the new policy suggested by the submitter commencing with “ <i>avoiding significant adverse effects, avoiding remedying or mitigating other effects and offsetting any residual adverse effects that is more than minor ...</i> ”. Without the full wording the meaning of the changes are unclear.
	New Policy – Pests	Oppose	The submitter seeks to add a new policy to “ <i>avoid the adverse effects of pest species prevent their introduction and their spread</i> ”. DPL oppose the wording of the policy, particular “to avoid”, which following the courts findings on King Salmon means to “not allow” or “prevent the occurrence of”. DPL support measures to prevent the introduction of pest species, but consider prevention of the spread of pest species a policy outcome which is unattainable, excessively expensive and inequitable for landowners subject to the spread of pest species from other land.
	Policy 4.5.5 Controlling the introduction and spread of pest plants and animals	Oppose	DPL oppose the amendments to this policy seeking to prevent the introduction and spread of pest plants and animals for the reasons expressed in relation to the policy above. Preventing spread of plant pests is an inappropriate policy outcome that does not achieve s.5 of the Act.
Ministry of Education (submitter 79) C/- Opus International Consultants Private Bag 1913 DUNEDIN Attn: Shane Roberts	Policy suite 2.1 Add policies to ensure the importance of the built environment as a physical resource is recognised.	Support	DPL supports the widening of focus to recognising the built environment.
	Policy 3.8.2 Controlling growth where there are identified urban growth boundaries or future urban development areas	Oppose	DPL opposes the relief sought by this submitter to introduce further matters to be consider under Policy 3.8.2 “ <i>before releasing new land for development</i> ”. DPL considers this policy should be deleted for the reasons expressed within its original submissions, including that Policy 3.8.1 appropriately deals with the issues relating to urban growth. Given the fundamental issues with the

The submission supported or opposed is:	The particular parts of the submissions supported or opposed are:	Support or Oppose	The reasons for support of opposition are:
			absence of urban growth boundaries in Schedule 8, the relief sought in this submission is not an appropriate or effective method to achieve the relevant objectives of the Plan.
Save The Otago Peninsula (STOP) Incorporated Society (Submitter 88) PO Box 23 Portobello DUNEDIN 9048	Policy 3.8.3 - Managing fragmentation of rural land	Oppose	DPL opposes the proposed addition to this policy as sought by this submitter. The value of the landscape resource is recognised and provided for more appropriately within Objective 2.2 and related policies.